



coalition of higher education students in Scotland

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Consultation on Cross Border Student Flows: Higher Education Tuition Fee Levels

Preamble

The Coalition of Higher Education Students in Scotland (CHESS) represents the interests and views of its member institutions; the students' representative bodies of the universities of Dundee, Edinburgh, Glasgow, St Andrews, Strathclyde and the Open University in Scotland.

Introduction

The institutions of CHESS have consistently opposed fees for participation in Higher Education, and further have consistently opposed any form of fee variability. The former acts as a deterrent to entry and a tax on ambition whilst the latter makes finance a determinant of career choice, and the content of this response in no way shows an acceptance of tuition fees or their variability, but does comment on pragmatic responses to what is a deeply undesirable funding situation in England.

Question 1 – Do you agree with the principles on which the general fee level be set?

CHESS believes it is unfortunate but necessary to charge fees for students domiciled elsewhere in the UK to protect places for Scottish students, but believes firmly that these should be a last resort, should be set at a flat-rate, should be set at the minimum level to maintain current cross-border flows, and should not be the only mechanism considered to regulate such flows. CHESS believes there are real dangers of over-detering students from elsewhere in the UK, particularly when considering the attractive bursary packages to be made available in England, and these concerns are particularly acute with regard to widening participation students, and in areas of under-recruitment such as science and engineering.

With specific reference to the five principles outlined in the consultation document:

Comparing fee levels with English universities

When comparing fee levels with institutions in England the Executive should use a broad comparison of different university types, rather than merely picking Russell Group comparators. Using comparisons with more 'elite' universities would ignore the breadth of HEIs in Scotland that English students do attend, albeit in varying numbers, and would appear to send the message that the Executive is happy to only expect non-Scottish students to attend institutions like St Andrews or Edinburgh, and that it is happy to only expect wealthier students to study in Scotland. Further, it would disadvantage institutions

that are more likely to be competing with others charging less than the maximum fee in England.

Another crucial consideration in any comparison - one that runs throughout our response to the consultation - is the need to include in calculations the often very considerable (and complex) bursary packages on offer to students studying in England. The real cost of attending university at many institutions in England cannot be found by comparing fee levels only, but can only be truly calculated by looking at the market in bursaries. CHES questions whether the Executive have considered this sufficiently in calculating that the total annual average cost of tuition would be between £2,200 and £2,500. Some institutions, particularly those with which the Executive wishes to make comparisons, will be offering very considerable bursaries – for example Cambridge and Durham are offering bursaries of up to £3000 per year, LSE up to £2500 and Manchester up to £5000, depending on circumstances. If the Executive wishes to compare fee levels at the top institutions, it must compare bursary provision at these institutions also.

The fee level influencing demand

CHES believes the fee level should preserve the status quo only and warns that setting the fee level too high without consideration of bursary comparisons or extra living costs for four-year courses may over-deter students, particularly in key areas.

Ensuring the fee level for a four-year course in Scotland is not more expensive than a three-year course in England

Translating the Quigley agreement in this way is both useful and necessary, but costs incurred by students are not merely from tuition fees, and the extra living costs for an extra year of study in Scotland will no doubt deter many, and may mean that the fee level need not to be exactly comparable.

Financing the support package for Scottish students going to English HEIs with revenue from cross-border fees

CHES supports the packages designed to ensure that students domiciled in Scotland are able to study anywhere in the UK, allowing greater educational choice for potential students, but believes that the fee levels set for non-Scottish students should be for the purposes of regulating cross-border flows only, and not a revenue raising tool. It is recognised that in reality there may not be a conflict if the fee level necessary to regulate flows creates enough surplus revenue to cover these costs, but the principle is not one that CHES would accept. If a situation arose whereby the fee level needed to regulate cross-border flows was lower than that needed to raise revenue, it would be undesirable to ask some groups of students to subsidise others, and it would have a negative impact on student welfare and recruitment if fee levels were set higher than necessary for such a purpose.

Avoiding a rise that risks any significant reduction in students coming to Scotland from the rest of the UK

CHES agrees with this principle and believes that unless living costs and bursary packages are taken into full account there is a real risk that a fee rise will be over-zealous and deter students from coming here, or at least ensure that the only students who do come here are affluent. Under-recruited areas like Science and Engineering could suffer most, as could universities competing with those charging less than £3000. There may be a need to investigate the promotion and co-ordination of strategic bursaries at a national level, to overcome shortfalls in certain key areas, ensure full recruitment, meet widening participation objectives and compete with provision in England.

In summary, the fee level should be based on a broad comparison of English institutions, should be maintain the status quo, should take into full account of enhanced student support in England and extra living costs in Scotland, should not seek to raise revenue for other projects, should be minimal, and should include extra provision (through bursaries or other means) to ensure widening participation and full recruitment.

Question 2 – at what level should general tuition fees be set?

Certainly given the extra factors mentioned above, the fee level should be at the lowest level on the scale adopted by Executive. The level should be in accordance with updated calculations based on a more thorough evaluation of bursary provision, living costs and recruitment objectives, which do not appear to have been fully accounted for in the consultation's calculations. The level this produces may turn out to be lower than the scale given by the Executive.

Question 3 – Should self-funded Scottish and non-UK EU domiciled students be protected from the increased level of tuition fee?

It is absolutely critical that *every* Scottish-domiciled student is protected from the fee increases. It would be unforgivable were students entering first year university after an HND, or those repeating more than one year, or any other such student, suffer because of changes in cross-border fees intended to apply only to non-Scottish students. The proposed policy change has nothing to do whatsoever with these groups of students and if they were caught up in these changes it would be because administrative mechanisms failed rather than because anybody wished them to. Systems must be made to adapt, and the IAG has suggested practical ways in which this could be done.

Students falling into this category are often those who the Executive should be helping – those progressing from FE to HE and those trying to access education again after previous difficulties – and rather than increasing their burden there is a very strong case to suggest that this group should be given much greater assistance than is currently available. Certainly articulation is an issue that needs to be addressed, but so does funding for those whose institutions do not allow them to articulate into later years.

Since EU law means that non-UK EU students would pay no fees in Scotland, but would pay top-up fees in England, CHES believes that the Executive should carefully monitor the application rates from EU students in case there is a significant rise in such applications from those who may see Scotland as an increasingly cheaper option as compared to England. If such a scenario does occur the Executive might need to manage such flows to protect Scottish-domiciled students.

Question 4 - Do you agree with the principle of using tuition fees to protect the interest of Scottish domiciled students by setting fee levels for medicine that are broadly comparable with those being set elsewhere in the UK?

CHES's principled and practical opposition to an increased fee for medicine is outlined in the response to a mini-consultation launched by the Fees Implementation Advisory Group, and is summarised in this section. Whilst sympathetic to recruitment needs of NHS Scotland and wholly supportive of efforts to widen participation in medical education, the response outlines CHES's opposition to the variability of fees, the undesirability of using fee levels as a tool for wider social, political or economic ends, and the range of alternatives available, including many outlined in the *Calman Report*, that must be considered *before* fees are brought in as an option. CHES believes that there need not be a conflict between NHS

recruitment and retention, places for Scottish students and a fees system without any element of variability.

In increasing (or at the very least maintaining) the number of Scottish students in medical education there is a role for creative government planning, improvement of Highers provision in many schools, alteration of university admissions procedures and requirements, and schemes to facilitate progression of widening participation students into medicine. Particularly, the Executive should:

- Provide more government-funded places for medical students and ensure students from St Andrews do not need to migrate to England for their clinical studies.
- Ensure all schools have the capacity to provide the necessary mix of Highers to enable students to enter medical education, and are actively encouraged to take them, ending the current system where some students simply do not have such an option.
- Ensure the requirements for admissions to medicine are neither onerous, nor disadvantageous to students with Highers as against students with A-Levels.
- Investigate ways in which admissions procedures might be developed to better facilitate the progression of Scottish students.
- Further promote schemes and initiatives such as 'Pathways to the Professions', foundation year courses and ring-fenced access routes, as well as programmes to raise aspirations amongst areas with lower participation rates.
- Provide financial incentives for Scottish students to enter medicine, alongside active recruitment and outreach programmes.

CHESS recognises that some of the above is being done to some extent, or has been called for in the *Calman Report*, but calls on the Executive to be bolder and more imaginative in many of these fields and believes that if carried out fully there would not be the same perceived need to introduce fee variability.

CHESS further believes that there are many alternatives available to ensure recruitment of doctors for NHS Scotland - the key stated reason for any fee variability - without using tuition fees and notes the opposition of the BMA to such fee variability. CHESS believes it is inappropriate to use tuition fees to resolve issues in the health service, particularly when other avenues have not been exhausted. In particular, the executive should:

- Improve working and living conditions in NHS Scotland to make Scotland a comparatively attractive place to seek employment.
- Introduce incentive packages, including 'golden hellos', both to help recruit those studying in Scotland who might otherwise migrate to England, and to attract medical graduates studying in England to practice in Scotland.
- Look at ways of improving links between the cities with medical schools and areas of the country with particular medical shortages.

CHESS firmly believes that all of the above measures relating to increasing numbers of Scottish-domiciled students studying medicine and recruiting and retaining doctors for Scotland must be applied boldly as a coherent package, and their impact monitored, before any consideration of fee variability. A great deal of scope to improve both these elements of the problem exist and should be exhausted first, with fees being very much a last, rather

than an easy, option. Tuition fees should not be used as a market force when the Executive are so aware of the externalities affecting the retention of medical practitioners.

CHESS holds further concerns that if the principle of variable fees were accepted by the Executive in the case of medicine then it would inevitably lead to similar 'special pleading' from other high-demand subject areas, which if accepted would lead to a differential and segmented market in Scottish Higher Education. Whilst welcome ministerial statements and amendments made to the Further and Higher Education (Scotland) Bill makes this less likely in the short-term, it remains a major concern of students in Scotland and the avoidance of a very dangerous precedent is necessary to allay these concerns.

CHESS opposes the introduction of a higher fee for non-Scottish medical students but if such a higher fee were to be introduced we would wish the Executive to make clear that medicine was genuinely an exceptional case that applied to no other subject. When setting the level it must also take into account the principles outlined in our responses to question 1. A £3000 fee, for example, which has been suggested by some bodies, could certainly not be justified given the generous bursary and support packages available in English medical schools, never mind the available alternatives already outlined. Thought should also be given to any extra revenue raised and there must be no incentive to recruit non-Scottish students because of funding mechanisms. A useful use of any revenue would be to fund access support for widening participation students.

Question 5 – Do you agree that the Executive should retain current tuition fee levels for HNs?

CHESS agrees that such fees should not be increased given the importance of Further Education in terms of widening participation and the much lower level of cross-border flows in the FE sector. If such fees were to be increased it would worsen FE-HE transition and damage access efforts.

Question 6 – Do you agree that gap-year students should be treated as having entered HE in 2005-6?

CHESS supports the proposal to ensure that students taking a 'gap-year' in 2005-2006 are treated as if they entered Higher Education during that year. Not doing so would mean that many less students would take gap years during this period, leading to increased pressure on places and more severe cross-border flows, causing difficulties both for universities managing applications, and students who might lose out on a place at the institution of their choice. Further, gap-years often provide valuable experiences to students, and can provide a time when they can save to help them through university.

Part-time students

CHESS believes that part-time students play a vital role in flexible learning and in widening participation and support the Executive's plan to protect these students from any changes.

Steve Cockburn
President Edinburgh University Students' Association
CHESS Secretary

