

Simon Batchelor
Higher Education Directorate
Department for Business, Innovation and Skills
2 St Pauls Place
125 Norfolk Street
Sheffield
S1 2FJ

23rd January 2013

Dear Simon

RE: Applying Student Number Controls to Alternative Providers with Designated Courses consultation

Firstly, thank you for the opportunity to respond to what is a clear and thorough consultation document and we welcome the opportunity to add our feedback to the consultation. This response is sent on behalf of Mountview Academy of Theatre Arts.

It might help you to understand our response to you if I begin by contextualising our operation. We are a leading UK drama school providing education and training for nearly 400 post 18 year olds leading to UK degrees validated by the University of East Anglia and Middlesex University and Diplomas validated by Trinity London. The school is constituted as a charity and company limited by guarantee. We are currently regulated by 6 separate bodies and these proposals would take us to 7. That said, we welcome the proposals but I'm sure you'll understand that in the final analysis there may very well be a simpler, more cost effective and ultimately more efficient means of achieving our objectives and those of government. We would welcome the opportunity to discuss this further as a result of this consultation.

Quality Assurance Requirements

At present we have to satisfy QAA oversight as a validated partner of both University of East Anglia and Middlesex University via partnership review and statutory reporting carried out through our partners. In terms of the five bullet points listed at 1.3.10 we are already inspected on each of these including assessment against the UK Quality Code for Higher Education by the University of East Anglia partnerships office and Middlesex University. By adding direct QAA inspection another layer of duplicated inspection would be placed on us.

Due to the haphazard way in which funding for some drama students has developed over the years we also have to satisfy Quality Assurance oversight for both Ofsted and Trinity College London. Additionally the Education Funding Agency (EFA) reviews our quality assurance annually and again tri-annually when we tender for further Dance & Drama Awards (DaDAs).

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We are also subject to Drama UK (formerly National Council for Drama Training) accreditation which covers teaching quality issues as well as student satisfaction, employment destinations and employability statistics.

Annually we are subjected to at least one major inspection and in academic year 2012/13 this is likely to be three major inspections in the form of revalidations. For a small organisation of less than 400 students we are, I suspect already inspected more frequently than just about any other educational provider in the UK. Adding Quality Assurance Agency oversight would simply be adding to the pile of inspections that are already independent, external and thorough.

Financial sustainability, management and governance requirements

As with Quality Assurance processes we are already subject to review of FSMG by our validating partners UEA & Middlesex University as well as the Education Funding Agency as part of our contract as a DaDA provider as well as in part through the Ofsted inspection regime. Further compliance as set out in the consultation paper will add to and duplicate rather than minimise bureaucracy

Possible Methods of Applying Student Number Controls

Of the two methods proposed, Method 1 is the only one which is sustainable for us. It would be very helpful if in recognition of our adjusting to this system of allocation that some consideration be given to transition before settling upon student number controls as our culture is as you can see complex. We ask that at this time of significant change we be offered the best opportunities possible to support students in accessing their education and training.

Timing

2013/14 seems ambitious but if this is to be achieved then we would appreciate that discussions start at the earliest opportunity and that support, guidance and flexibility in a transition year is offered.

Information on student population at alternative providers

Mountview collects data on students for statutory reporting purposes for the Education Funding Agency, Drama UK as well as our validating universities. The proposed move to HESA reporting would require investment and some changes in our practices. It would be expected that there be some flexibility and support, both financial and training as well as a phasing in of the move to full HESA reporting.

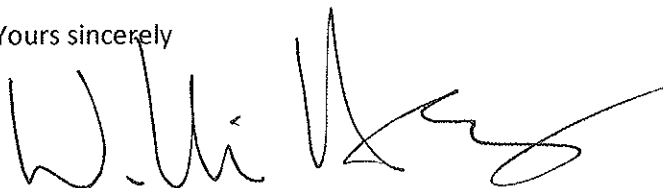
Summary

While Mountview Academy of Theatre Arts welcomes the opportunity for dialogue on the question of future funding for students, it is important that the Department for Business, Innovation and Skills recognise that we are facing a substantial increase in bureaucratic reporting to government and supervisory bodies which is in stark contrast to the wish expressed in the introduction to this paper, and by government in general that bureaucracy be minimised. We are overly and burdensomely regulated already and while we acknowledge the need for transparency, accountability and qualitative review in order to protect public funds and importantly students, the addition of another layer of regulation will not improve accountability one jot. The answer to each and every review has been further regulation. With these proposed changes there is an opportunity for us in partnership with BIS to review and streamline the levels of student access to funding and the accountability that is required in order to satisfy the key objectives of such accountability.

Ultimately, as BIS moves all Higher Education providers towards a more level playing field, it becomes difficult to distinguish between those of us who are designated Alternative Providers and those of us who are classified as Publicly-funded providers. It might very well be that the simplest and most efficient way forward, both financially and in terms of bureaucracy, would be for organisations like us to opt to transfer to Hefce recurrent funding rather than the complex funding model that has through no fault of anyone grown up over the last twenty years for providers such as ourselves.

Please do not hesitate to contact me if you wish to clarify anything expressed here.

Yours sincerely

A handwritten signature in black ink, appearing to read 'William Harris', with a stylized flourish at the end.

William Harris

Deputy Principal and Academic Registrar