

# Consultation on recurrent funding for 2021-22

## Introduction

We would like to collect your name and email address so that we can contact you in the event that we need to clarify any of your responses. This information will not be published. Please note that, if you choose to provide us with personal information as part of your consultation response, you will need to consent to us processing your data in line with the privacy notice outlined above.

I consent to the OfS processing my personal data in line with the privacy notice outlined above.

## Contact details.

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## In what capacity are you responding to the survey?

To provide an official response on behalf of a higher education provider, organisation or representative group

## Information about your organisation

Name of higher education provider or representative group

University and College Union

Unless you indicate that you would prefer your response to be confidential, we may quote sections of your response when we publish a summary of responses to this consultation on the OfS website (and in alternative formats on request). This may include a list of the providers and organisations that respond, but will not include personal data such as individual names, email addresses or other contact details. Individuals and organisations will not be identifiable in our consultation response. We will not publish individual responses. Are you happy for passages from your responses to be published on the OfS website?

Yes, I am happy for my responses to be published.

## Funding for high-cost subjects

Question 1: To what extent do you agree with the proposal to distribute a greater proportion of the OfS recurrent grant through the main high-cost subject funding method? (See paragraphs 15 to 36.)

Tend to disagree

**Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

UCU recognises the value of the high-cost subject funding method as a mechanism to support courses which are more expensive for providers to run. It has a crucial role to play in enhancing student choice by ensuring that courses in all subjects remain viable and accessible.

While the overall aim of maintaining or enhancing high-cost subject funding is therefore welcome, UCU is deeply concerned by the proposal to create a two-tier system whereby high-cost funding for medicine and STEM subjects is increased while high-cost funding for performing arts, creative arts, media studies and archaeology is cut by 50%. The government may not deem the latter to be strategic priorities but this belies the cultural and economic importance of these subjects. They should continue to be funded at the same rate as other high-cost subjects.

Sustainable government funding is absolutely crucial for the success of the higher education sector; it is therefore deeply troubling to note the drop of almost 20% in average unit funding for providers as outlined in Table 4. The government needs to recognise the value of higher education as a whole and reverse this damaging trend in order that all subjects can be adequately and securely funded.

Question 2: To what extent do you agree with the proposal to split price group C1 in order to implement a reduction of 50 per cent to the high-cost subject funding allocated to subjects in the performing arts; creative arts; media studies and archaeology? (See paragraphs 15 to 26.)

Strongly disagree

**Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

UCU is deeply concerned by the impact which proposed changes to the C1 price group will have on subjects in performing arts, creative arts, media studies and archaeology. We are disappointed that the government announced its intention to deprioritise these areas without consulting the staff, students and institutions that will be negatively impacted.

Cuts to funding in these areas risks undermining the viability of courses, reducing subject choice for students and threatening the job security of academic and support staff who deliver these important subjects.

As the consultation document recognises, these subjects are not only socially, economically and culturally important, they play a crucial role in widening access and participation in higher education. In particular, the role of these subjects in enhancing access for disabled students is noted. A full equality impact assessment should therefore be conducted ahead of any changes to funding to ensure that funding decisions do not have a detrimental impact on any groups with protected characteristics.

While the OfS proposes to prioritise funding for small and specialist institutions which cater for many students in the creative and performing arts, it is important to recognise that not all students can or wish to leave home in order to study. If courses in these subjects become the preserve of a few institutions it will lead to geographical cold spots which will seriously disadvantage students in many parts of the country - particularly those with caring responsibilities or specific needs which means they wish to study locally. Small and specialist institutions have an important role to play but this should not be at the expense of the wider sector.

UCU therefore believes that the OfS should reconsider the proposal to split the C1 group and create a differential in funding levels between different subjects currently eligible for high-cost subject funding.

Question 3: Notwithstanding your answer to question 2, if we were to split price group C1 as proposed, to what extent do you agree with our approach to implementing this? (See paragraphs 27 to 28 and Annex B.)

Don't know / prefer not to say

Question 4: To what extent do you agree with our approach to counting students from the Crown Dependencies in our funding allocations for 2021-22? (See paragraphs 34 and 35.)

Tend to agree

**Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

Stability of funding to higher education providers should be a central concern for the government and the OfS, so it is right that this change be made in order to avoid any reduction in income as a result of the reclassification of students from the Crown Dependencies.

## London weighting

Question 5: To what extent do you agree with the proposed approach to remove the targeted allocation for students attending courses in London? (See paragraphs 37 to 48.)

Strongly disagree

**Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

London is the UK's most expensive city to live, study and work in and as such London weighting is not additional money but a way to bridge the gap and ensure high quality education can be delivered to an often more diverse community than in the rest of the country.

To cut funding for universities that are working hard to widen access and participation across London will hit students and staff from some of the most diverse, and often disadvantaged communities. It is not fair to hit them harder, purely because they live in London. In particular, UCU rejects the divisive rationale outlined in paragraph 48 of the consultation which suggests that it is justifiable to reduce the equality of opportunity for Black and minority ethnic students in London in order to promote equality of opportunity elsewhere - citing the underrepresentation of white students in receipt of free school meals. Access to higher education should not be a zero sum game.

More generally, UCU is entirely unconvinced by the government's suggestion that additional funding for London institutions is incompatible with the levelling up agenda. London institutions have a particular appeal to international students in particular and this brings significant economic benefit to the UK as a whole. Cuts to funding for students at these institutions therefore risk not only disadvantaging local students in London but also the global appeal of the London higher education sector.

Universities across the country are already struggling financially due to the current pandemic and many, including a number in London, are proposing to cut jobs. We are gravely concerned that cuts to funding during this pandemic could result in institutions looking to make further cuts to staff and courses.

We are also disappointed that the government announced this decision without consulting the staff, students and institutions that will be negatively impacted.

Question 6: To what extent do you agree with the proposed approach to remove London weighting from the formula-based student premium allocations? (See paragraphs 37 to 48.)

Strongly disagree

**Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

See answer to Question 5

## Funding to widen access and support successful student outcomes

Question 7: To what extent do you agree with the proposal to provide £40 million to support Uni Connect activities in 2021-22? (See paragraphs 59 to 63.)

Tend to disagree

**Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

Effective outreach is absolutely crucial in widening access and participation in higher education. The Uni Connect programme provides valuable support in bringing together different parts of the education system and should therefore continue to be funded at the current level.

Question 8: To what extent do you agree with the proposal to distribute an additional £5 million through the existing student premiums in the proportions show in paragraph 65, and to earmark this £5 million to be spent on student hardship?

Tend to agree

Question 9: To what extent do you agree with the proposals to distribute £15 million to address student transition and mental health, through a combination of competition and a new formula-based student premium? (See paragraphs 67 to 71.)

Tend to agree

**Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

UCU is deeply concerned by the rise in mental health issues amongst students and staff, which has been made more acute by the pandemic. It is clear that the current level of investment in mental health support in higher education is a drop in the ocean compared to what is required. Investing in student mental health should be a priority not only because of the direct benefits for students, but because it will help to address the additional pressure on HE staff associated with providing higher levels of pastoral support to students (something which is rarely properly accounted for in workload modelling, and in turn contributes to worsening mental health amongst staff). However, this shouldn't come at the expense of other areas of recurrent funding; it should be an urgent priority for additional investment from the government.

## Other recurrent budget proposals

Question 10: To what extent do you agree with the proposal to maintain in cash terms the rate of funding for the nursing, midwifery and allied health supplement, which will increase the total budget to £27 million? (See paragraphs 74 to 75.)

Strongly agree

Question 11: To what extent do you agree with the proposal to maintain in cash terms the rate of funding for overseas study programmes, but base the allocation on the higher of relevant student numbers in either 2019-20 or 2020-21? (See paragraphs 76 to 78.)

Tend to agree

**Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

International exchange is a hugely valuable aspect of the higher education system and brings huge benefits to students, particularly those studying modern languages for whom the chance to study abroad is vital. UCU has a number of concerns about the UK's withdrawal from Erasmus and the transition to the new Turing scheme but maintaining proper investment in this area will be vital in ensuring continued success.

Question 12: To what extent do you agree with the proposal to maintain in cash terms the budgets for other targeted allocations as proposed in paragraph 79?

Tend to disagree

**Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

UCU has raised a number of concerns about accelerated undergraduate degrees and believe this is an area where the OfS could reduce funding further in order to support other priorities.

## Modelling the impact on providers

Question 13: Do you have any comments about any unintended consequences of these proposals, for example, for particular types of provider or for particular types of students?

As outlined in response to earlier questions, UCU is particularly concerned that the proposals to cut funding for the performing arts, creative arts, media studies and archaeology, as well as proposals to cut London weighting funding, will have a detrimental impact on several different groups of students.

The proposed cuts to London weighting are likely to impact most heavily on London institutions which focus on local recruitment and therefore have a crucial role to play in widening access.

## Equalities impact assessment

Question 14: Do you have any comments about the potential impact of these proposals on individuals on the basis of their protected characteristics? Protected characteristics are defined in Part 11 of the Equality Act as: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation. See: [www.legislation.gov.uk/ukpga/2010/15/part/11/chapter/1](http://www.legislation.gov.uk/ukpga/2010/15/part/11/chapter/1).

Yes - in particular UCU is concerned about the impact on disabled and Black students. For details see responses to earlier questions.

## **Terms and conditions of grant for 2021-22**

Question 15: To what extent do you agree with the proposed changes to terms and conditions of grant for 2021-22? (See paragraph 97.)

Don't know / prefer not to say