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Submitted to Higher Education Reform
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Foreword from the Secretary of State and Minister of State for Higher and Further Education

Responding to the Independent Panel that reported to the Review of Post-18 Education and Funding on higher education

Executive Summary

Who this is for:

About you:

1 What is your name?

Name:
Angela Nartey and Rob Copeland

2 What is your email address?

Email:
anartey@ucu.org.uk

3 Are you responding as an individual or on behalf of an organisation?

Organisation

If you selected organisation, please provide the name of that organisation. :
UCU

4 Would you like us to keep your responses confidential?

No

Reason for confidentiality:

5 Do you consent to the data you provide being held in accordance with UK GDPR as covered in the Department for Education's personal information charter?

Yes

Part 1: Policy statement on higher education funding and finance

Part 2: Consultation on potential reform areas (Section A)

6 What are your views of SNCs as an intervention to prioritise provision with the best outcomes and to restrict the supply of provision which offers poorer outcomes? If you consider there are alternative interventions which could achieve the same objective more effectively or efficiently, please detail these.

Please explain your answer and give evidence where possible.:

The tuition loan system – in conjunction with the abolition of SNCs - has contributed to hyper competition between institutions for undergraduates. This has led to unequal consequences for institutions – for example, recruitment difficulties which have led to job losses in some institutions, particularly in widening participation institutions, while other universities have expanded rapidly and resulted in spiralling workloads and stress for staff. As the Augar report says, the funding model has also resulted in extensive marketing and other inducements for students to study at particular universities.

We believe that the fundamental problem lies with the highly marketised system of higher education that has been established over the past decade. An alternative way to ensure greater quality and equity is the abolition of student fees and the reintroduction of core public funding for teaching.

7 What are your views on how SNCs should be designed and set, including whether assessments of how many students providers can recruit should be made at: Sector level? Provider level? Subject level? Level of course? Mode of course?

Please explain your answer and give evidence where possible.:

In the context of a dysfunctional fees and loan system, we remain unconvinced of the benefits of SNCs as a policy lever to ensure greater quality and equity. Moreover, we are very concerned about the proposal to bring in SNCs at a subject level or at the level of course. The continued rhetoric around

'low value' courses with 'poor outcomes' for students is damaging to the higher education sector and its reputation internationally. In addition, the current approach is overly focused on courses which will guarantee graduate earnings in the short term. As the Council of Europe have suggested, the purposes of higher education are much broader than simply 'preparation for sustainable employment' but also involve 'personal development', 'preparation for life as active citizens in democratic societies' and also the 'development and maintenance, through teaching, learning and research, of a broad, advanced knowledge base.' We call on the DfE to abandon its current approach to 'low value' subjects and courses and to re-establish the principle of higher education as a public good.

8 The Government is considering which outcomes should be used if SNCs are introduced and has identified the three broad categories as quantifiable, societal, and/or strategically important. What are your views of the merits of these various approaches to consider outcomes and/or do you have any other suggestions?

Please explain your answer and give evidence where possible. :

If SNCs are to be used, we believe that there should be a greater focus on the societal outcomes of higher education (for example, in relation to education and teaching) rather than simply graduate earnings. In terms of strategically important areas, we encourage the DfE to develop mechanisms to encourage higher education institutions to provide courses that contribute to priorities around Net Zero and clean growth.

9 Do you have any observations on the delivery and implementation of SNCs, including issues that would need to be addressed or unintended consequences of the policy set out in this section?

Please give evidence where possible.:

10 Do you agree with the case for a minimum eligibility requirement to ensure that taxpayer-backed student finance is only available to students best equipped to enter HE?

No

Please explain your answer and give evidence where possible. :

There is a clear contradiction between the government's own rhetoric around the 'levelling up' agenda published on 2 February 2022 described as a 'moral, social and economic programme for the whole of government... [to] spread opportunity more equally across the UK' and these proposals, published on 24 February 2022, to limit access to education by imposing a financial barrier for students who do not have the means to fund themselves through higher education.

We disagree that this policy measure would mean that access to higher education would be for those 'best equipped to enter HE'. The proposal only applies to students from low-income backgrounds. As such access to higher education would remain open to those who have the means to fund themselves. This proposal thereby serves to nominally suppress aspiration and is effectively an attack on working class learners. We know that there is demand for higher education amongst these targeted groups and so these proposals risk leaving students open to financial exploitation if they seek alternative means of self-funding via nefarious actors such as payday loan organisations.

Recent research conducted by the Institute for Fiscal Studies (IFS) has shown that whilst undergraduates who do not meet the proposed GCSE or A-level requirements are just over 10 percentage points less likely to complete a degree than students meeting both thresholds, around 80% of these students do still graduate and thereby benefit from all of the well-established personal and societal benefits of higher education.

There are significant disparities in educational attainment and progression to higher education by socioeconomic-background and ethnicity. IFS research has modelled the shows two groups that would be disproportionately affected by these proposals. The GCSE-based policy proposals would disproportionately impact nearly 25% of undergraduates who were previously eligible for free school meals compared with just 9% of their non-free school meal eligible peers and just 5% of private school students. Higher rates of higher education participation amongst ethnic minority pupils would also see disproportionate impacts for these groups compared with their white peers. Whilst impacting 7% of undergraduates who are white, the same policy would impact 10% of students who are Chinese and Indian, 18% of students who are Bangladeshi and Indian and 23% of students who are black African and Black Caribbean.

It is unclear how these proposals could be successfully applied in Wales which has a socioeconomic duty) and Scotland, where the Fairer Scotland Duty applies (effectively a socio-economic duty on public bodies in Scotland). The sheer number of proposed exemptions posed via questions 8 – 12 are also indicative of the fact that this policy is likely to have a regressive impact.

Last, these proposals come at the end of a very difficult period for young people both educationally and personally. The covid-19 pandemic means that many young people might not see their GCSE or Level 3 performance aligned with their potential due to ill mental health, grieving, and/or lack of experience with formal assessment.

<https://www.gov.uk/government/publications/levelling-up-the-united-kingdom>

Drayton,E, van der Erve. L, (2022), The impact of student loan minimum eligibility, The Institute for Fiscal Studies <https://ifs.org.uk/publications/16039>

Department for Education, 2022c. Entry rates into higher education.

<https://www.ethnicity-factsfigures.service.gov.uk/education-skills-and-training/higher-education/entry-rates-into-highereducation/latest> and Department for Education, 2022d. GCSE English and maths results.

<https://www.ethnicity-factsfigures.service.gov.uk/education-skills-and-training/11-to-16-years-old/a-to-c-in-english-and-maths-gcseattainment-for-children-aged-14>

in Drayton,E, van der Erve. L, (2022), The impact of student loan minimum eligibility, The Institute for Fiscal Studies

<https://ifs.org.uk/uploads/IFSBN343-The-impact-of-student-loan-minimum-eligibility-requirements.pdf>

11 Do you think that a grade 4 in English and maths GCSE (or equivalent), is the appropriate threshold to set for evidence of skills required for success in HE degree (level 6) study, managed through their eligibility for student finance?

No

Please explain your answer and provide reference to any pedagogical or academic sources of evidence to explain your reasoning. :

These decisions have long been subject to institutional autonomy. We believe it is wrong for the government to intervene in this way by creating financial barriers that are not grounded in educational ideology. Indeed, these proposals are contradicted by the fact that they do not apply to mature students when they progress to higher education.

12 Do you think that two E grades at A-level (or equivalent) is the appropriate threshold to set for eligibility to student finance, to evidence the skills required for success in HE degree (level 6) study?

No

Please explain your answer and provide reference to any pedagogical or academic sources of evidence to explain your reasoning. :

Please see question 11.

13 Do you agree that there should there be an exemption from MERs for mature students aged 25 or above?

Yes

Please explain your answer and give evidence where possible.:

Though we do not believe that minimum entry requirements for access to student finance should apply to non-mature students either.

14 Do you think there should be an exemption from MERs for part-time students?

Yes

Please explain your answer and give evidence where possible. :

Though we do not believe that minimum entry requirements should apply for access to student finance either.

15 Do you agree that there should be an exemption to the proposed MERs for students with existing level 4 and 5 qualifications?

Yes

Please explain your answer and give evidence where possible.:

Though we do not believe that eligibility to student finance should be restricted by minimum entry requirements.

16 Do you agree that there should be an exemption from any level 2 eligibility requirement to level 6 study for students with good results at level 3?

Yes

Please explain your answer and give evidence where possible. :

Yes, though we do not believe that the minimum eligibility requirement should not be applied.

17 Do you agree that there should be an exemption to MERs for students who enter level 6 via an integrated foundation year, or who hold an Access to HE qualification?

Yes

Please explain your answer and give evidence where possible. :

Yes, though we do not believe that the minimum eligibility requirement should not be applied.

18 Are there any other exemptions to the minimum eligibility requirement that you think we should consider?

Not Answered

Please explain your answer and give evidence where possible. :

The minimum eligibility requirement should not be applied.

Part 2: Consultation on potential reform areas (Section B)

19 Do you agree with reducing the fee charged for foundation years in alignment with Access to HE fees?

Not Answered

Please explain your answer, providing evidence where possible. :

UCU has long been in favour of zero tuition fees for students, however, in the current context, we are concerned that any reduction in fee level without government subsidisation could lead to a reduction in the quality and or quantity of these courses as institutions grapple with reduced funding. Foundation years play an important role in fair access and widening participation. Given government targets for improvement in these areas, any reductions in funding could adversely impact progress.

20 What would the opportunities and challenges be of reducing the fee charged for most foundation years, and of alignment with Access to HE fees?

Please explain your answer, providing evidence where possible. :

The clear challenge here would be for government to supplement any loss in funding to enable that foundation year stay open.

21 Do you agree there is a case for allowing some foundation year provision to charge a higher fee than the rest? Or is there another way for government to support certain foundation years which offer particular benefits?

Please explain your answer. :

Differential fees are likely to unduly impact student decision making and risk creating unhelpful funding disparities both within and across institutions. It is important that any funding differentials be supported by replacement funding at government level.

22 If some foundation year provision were eligible to attract a higher fee, then should this eligibility be on the basis of: Particular subjects? Some other basis (for example by reference to supporting disadvantaged students to access highly selective degree-level education)?

Please explain your answer. :

23 What are your views on how the eligibility for a national scholarship scheme should be set?

Please explain your answer. :

Eligibility should of course be set as wide as possible to ensure that students from backgrounds that are included in the protected characteristics under the equalities act and students from low socioeconomic backgrounds are facilitated to be able to continue their education to the same extent as their peers.

Reintroducing the student bursary scheme, and greater provision of grants would be an alternative way of providing funding. There are well established eligibility parameters for these which have worked well in the past.

Part 2: Consultation on potential reform areas (Section C)

24 How can Government better support providers to grow high-quality level 4 and 5 courses? You may want to consider how grant funding is allocated, including between different qualifications or subject areas, in your response.

Please explain your answer and give evidence where possible.:

We need to take radical steps to improve access to education with full funding for fees restored along bursary, Educational Maintenance Allowance and grant funding for all regions and nations of the UK. We need to view education as a public good in itself and thus there should be no limitations on the courses, levels or modes that are eligible for funding.

There should be clear funding commitments to further and higher education provision over a 5-year period to provide stability and allow provision to be planned. Where we do examine outcomes, these should be broad and contextual and reflect the range of abilities, aspirations and motivations for learning.

There is increasing casualisation of the higher and further education workforce. These contracts have the pernicious effect of diminishing the value of academic teaching and, furthermore, the student experience. For students this means their lessons may not have enough staff, they may not know from term to term who is teaching them, and that it is impossible to build up proper educational relationships with a fast-changing workforce.

25 What drives price differences at level 4 and 5, where average fees in FE providers are significantly lower than in HEIs?

Please explain your answer and give evidence where possible. :

26 To what extent do the drivers of fees at levels 4 and 5 differ from those for level 6 (including between universities, further education colleges and independent providers)?

Please explain your answer and give evidence where possible.:

27 How can we best promote value for money in the level 4 and 5 market to avoid an indiscriminate rise in fees?

Please explain your answer and give evidence where possible.:

28 Which learner types are more or less price-sensitive and what drives this behaviour? As part of your response, you may want to specifically consider the learner cohorts described above and the equalities considerations set out in the level 4 and 5 section of the equality analysis document, published alongside this consultation.

Please explain your answer and give evidence where possible.:

In the UK, age, gender and gender identity, pregnancy or maternity leave, disability, ethnicity and sexual orientation can each serve to render these communities more socioeconomically disadvantaged. As such, it is reasonable to believe that this could lead to greater price-sensitivity amongst some of these learners.

In 2017, Callender and Mason published research to show that 'with tuition fees and growth in student loan debt between 2002 and 2015, debt averse attitudes increased among lower-class prospective students, the gap in attitudes between lower- and upper-class students widened, and fear of debt negatively contributed to lower-class students' anticipated higher education participation relative to other social classes.'

As such, any price rise could negatively impact participation in higher education.

Callender, Claire and Mason, G. (2017) Does student loan debt deter higher education participation? New evidence from England. The ANNALS of the American Academy of Political and Social Science 671 (1), pp. 20-48. ISSN 0002-7162.

29 What are your views on the current barriers, including non-financial barriers, that providers face in offering and marketing level 4 and 5 courses?

Please explain your answer and give evidence where possible.:

In 2015, UCU published 'Young people's perceptions of their post-18 education and training options'. This research showed the stark way in which socioeconomic background impacts receipt of careers education, information and guidance. For example, the research identified huge variation in the information, advice and guidance (IAG) received by socioeconomic background and type of education institution attended. Those attending state schools and colleges were much less likely to report that they had received each of the different forms of IAG. 16% of learners who attended state school say that they have received no information, advice or guidance. Just 5% of learners who attended a private school said the same.

There is a need for greater information, advice and guidance to support decision-making. Reversing the current trend will require coordination, greater accountability for delivery and crucially increased funding to facilitate improvement.

30 We want to ensure that under a flexible study model, learners studying HTQs still develop occupational competence. We also want the quality and labour market value of individual higher technical modules to be signalled. Which of the approaches below, which could be introduced separately or together, do you prefer for delivering these aims, and why?

Please explain your answer. :

31 How would these approaches align or conflict with OfS and/or university course approval requirements?

Please explain your answer and give evidence where possible.:

32 Are there any other approaches we should consider?

Please explain your answer and give evidence where possible.:

33 How should any of these approaches be applied to qualifications already approved as HTQs?

Please explain your answer and give evidence where possible.:

Additional Comments

34 Do you have any other comments?

Free Text:

The University and College Union (UCU) represents over 130,000 academics, lecturers, trainers, instructors, researchers, managers, administrators, computer staff, librarians and postgraduates in universities, colleges, prisons, adult education and training organisations across the UK. We are grateful for this opportunity to respond to this consultation.

Annex A - table of interventions and consultation questions

Consultation Questions

