

UCU briefing on the Post-16 Education and Skills White Paper

Overview	1
Section 1: Further education and skills	2
Skills.....	2
Funding	3
Information, Advice and Guidance	7
FE workforce	7
Adult Education	9
Section 2: Higher education	9
Specialisation and collaboration in teaching and research	9
Funding and efficiency.....	10
Fair access and widening participation.....	11
Governance and academic freedom	14
Section 3: Data and Artificial Intelligence	14
Delivery and curriculum.....	14
Skills development	15
System management.....	15
Curriculum design.....	15

Overview

The University and College Union (UCU) is the largest trade union and professional association for academics, lecturers, trainers, researchers and academic-related staff working in further and higher education throughout the UK.

The [Post-16 Education and Skills White Paper](#) was published on 20 October. While the primary focus of the White Paper is on England, several of the proposals, particularly in relation to research funding and international students, have UK-wide implications.

In essence, the White Paper seeks to encourage greater collaboration, specialisation and flexibility in the post-16 education system.

We support the ambition for stronger collaboration between universities, FE providers, and local government and welcome the White Paper's recognition that 'Our higher education sector is one of the country's most valuable strategic assets' (p.45). However, these objectives and statements will remain aspirational without reform to the current competitive, market-driven funding model.

We are concerned that proposals for further specialisation, for example, through greater concentration of research funding, targeted subjects for maintenance grants and the creation of Technical Excellence Colleges, will lead to further contraction in university provision and reduced provision offered by accessible, generalist FE colleges.

While the White Paper echoes key UCU concerns around 'ongoing workforce challenges' (p.7), the recommendations fail to tackle the recruitment and retention crisis in FE or rising job insecurity in HE. Many of the ambitious proposals in the white paper, including the new target of two-thirds of young people participating in higher level learning by age 25, will not be delivered without major investment in staff pay and conditions.

The White Paper identifies 'financially unsustainable operating models (p.7) as one of the challenges facing colleges and universities. However, the government has doubled down on the disastrous tuition fee model in higher education and has failed to adequately address the funding shortfall in FE.

Moreover, the narrow focus on economic utility and industrial strategy sidelines the civic, democratic, and critical role of our colleges and universities. This represents a fundamental narrowing of what further and higher education is for.

As part of our campaign, UCU will continue to make the case for further and higher education as an essential public good and the centrality of staff to high-quality learning, teaching and research.

This briefing paper is divided into two main sections: firstly, the key recommendations for further education and secondly, the main ones for higher education.

Section 1: Further education and skills

Skills

A central tenet of the Post-16 Education White Paper is skills for economic growth. This was a central tenet of the previous government, going back to the 'Skills for Jobs' White Paper in 2021 and related papers. This current White Paper carries forward that agenda with the objective of creating a more 'joined-up' skills and employment system.

UCU's response: Local Skills Improvement Plans (LSIPs) have been in existence since the introduction of the Skills and Post-16 Education Act 2022, and with educators excluded from the LSIP process, we are uncertain what evidence there is of the LSIPs' output and successes.

In relation to green skills, the paper makes reference to clean energy engineering courses and to the plan to expand the Technical Excellence Colleges' programme to the clean energy sector; however, given that green skills are the driving force to deliver the government's net zero commitments, and that green skills are potentially the largest source of jobs between now and 2025, we are disappointed about the lack of emphasis on green skills in the post-16 white paper. UCU's own research identifies significant challenges across the skills system, particularly within the further education sector, and concludes that the UK is not currently on track to meet its green skills targets. Our [report with SOS-UK](#) highlights how further education colleges are central to vocational and technical training in the UK but many report severe instructor shortages, especially in energy and construction-related fields.

Opportunity for FE / Adult Education: we do see 'opportunities' for FE colleges and therefore FE and ACE teachers/members – opportunities in terms of a continued flow of work (if not increased expectations on the 16-19 education sector). However, these may not translate into opportunities for *all*, as the trajectory of the courses being offered focuses on subjects such as digital skills, construction, engineering, social care, and childcare.

Funding

'Additional' money

The White Paper states that the government will provide £1.2 billion of 'additional' investment per year in skills by 2028-29. A few points are worth noticing in relation to this commitment:

This 'additional' money is to cover the additional expected learners per year over the next few years and therefore arguably, not all 'additional' money in the sense that there will be additional money per student. The paper does say that this 'additional' money "*will enable the recruitment and retention of expert teachers in high value subject areas, and interventions to retain top teaching talent*"; however, some of the financial detail is absent and largely aspirational, given that the starting salary of FE teachers will be significantly lower than that of schoolteachers, let alone industry.

UCU comment: Whilst the White Paper itself does not address the issue of FE pay, we believe that the increased industry/growth expectations placed on FE colleges in the White Paper make it difficult for the DfE/Treasury to avoid the issue of parity of pay closer to the next General Election.

We do not believe that the paper makes it clear that all of this investment will go to 16-19 education, only that a "significant" amount will be invested in this sector. The other point to be aware of, when distributing funds between the 16-19 sector, is that not all of it will go to FE colleges – some of it will go to private providers.

The paper talks about the amount of investment in 16-19-year-old education and training, e.g. that the government has already increased investment in 16-19 education by £400 million in the 2025-26 financial year, and from the Spending Review, nearly £800m extra will be invested in

2026-27. However, it is questionable how useful those sorts of statistics are in the absence of context.

In the absence of the provision of the granular detail and context, the starting point for an analysis of the funding promises is the analysis by the [Institute of Fiscal Studies \(IFS\)](#), which finds that the increase is, indeed, an increase in real terms, of 3% per student. However, the IFS analysis informs us that despite this per student funding uplift, it is still lower in real terms than in the early 2010s by 4% (and 18% in school sixth forms). IFS analysis informs us that in the financial year 2011-12, per student funding was just under £9,000, whereas that figure dropped to just over £7,000 in 2024-25. The uplift promised for 2026-27 is approximately £8,000 per student, around what it was in 2012-13. The paper does reiterate that this money will “*support colleges and other providers to recruit and retain the high-quality teachers they need*”; however, as the IFS say in their analysis, there are new expectations on FE colleges, including delivering new qualifications and strengthening the FE workforce, all of which puts additional pressures on college resources. Also, we have to remember that we have been here several times before, when governments have announced increased funding to an already depleted sector, and the issue of staff pay, left to individual colleges, remains unresolved.

UCU comment: with the *combination* of tangible support that UCU and the FE sector have in our armoury for parity of pay, UCU believes that parity of pay for the FE sector must rise up the political agenda. That tangible support includes the recommendations in the [House of Commons’ report](#) to the FE and Skills Inquiry earlier this year, which recommends that the DfE should establish a statutory pay review body for colleges, similar to the School Teachers’ Review Body, and that colleges should be exempt from paying VAT on expenditure. Also, the government’s need for growth, and its implications for skills and skills training, cannot be underestimated in the call for parity of pay for FE with schools. That said, the [government’s recent response](#) to the House of Commons’ Education Committee FE and Skills Inquiry, which reported after the publication of the Post-16 Education White Paper, rejects both of those tools – a pay review body for colleges and VAT exemptions for colleges. Whilst disappointing, the importance of those recommendations in the first place are not to be underestimated.

Formula funding: the paper goes on to say that the DfE will undertake a 16-19 funding formula review to maximise the impact of the funding; however, before anyone becomes too optimistic about that, the indications are that this will be targeted at the “high-value” courses in “critical subjects areas” linked to “priority sectors”. These include digital skills, construction and engineering.

We note that there is no indication that any formula review will lead to ‘increased’ funding, as such, but rather, a tweaking of the formula, suggesting that there will be winners and losers. We expect the ‘winners’ to be those ‘high-value’ courses in ‘priority’ sectors. The focus is on growing the economy, not growing all individuals.

One passage in the White Paper (2.1.2), appears to confirm our suspicions in relation to the £1.2bn investment when it says: “*This... investment [of £1.2bn] will ensure there is increased funding to... **maintain** [emphasis added] real terms per-student funding in the next academic year to respond to the demographic increase in 16-19-year-olds*”. It then goes on to say that: “*This will enable the recruitment and retention of expert teachers in high value subject areas, and interventions to retain top teaching talent*”. The problem with this statement is that maintaining

current per-student funding is not necessarily going to enable colleges to increase teachers' salaries, due to increases in annual inflation.

Capital investment and Technical Excellence Colleges: one interesting point that we note in the paper is the way in which it addresses capital investment for estates and facilities – something that is not new, in itself, in recent years, but in the White Paper, labelled as the 'Skills Mission Fund' – once again focused on “addressing skills shortage in priority sectors”. This includes expanding Technical Excellence Colleges.

UCU comment: one matter we will have to monitor is whether the Technical Excellence Colleges will be given financial priority over other FE colleges. The concern is that that could lead to a different level of unfairness and inequality than already exists within the post-16 education sector, whereby high-level technical skills may be given priority over developing lower-level skills.

The White Paper promises to “explore measures to allow FE colleges to secure loans from local or strategic authorities to improve estate condition, foster innovation in facilities and services, drive the delivery of national and local skills priorities...”. The potential for increased commercialisation of the FE sector is something that we need to be mindful of and monitor. With such financial depletion in the FE sector over the last decade and a half, and with investment required to 'level-up' the sector to the standards of our European counterparts, we have to be mindful that this 'exploration' may expand beyond local and strategic authorities to commercial entities. If that happens, we believe that what we could be looking at is a model of corporate sponsorship or partnership, where that particular 'partner' or 'sponsor' may have an influential voice in the running of the college. It is important to emphasise that these ideas are not in the White Paper; however, they are not new ideas and it is prudent for us to be mindful that they may re-surface at some stage in the future.

Qualifications

The White Paper proposes reform of study pathways so that there will be '*high-quality pathways and qualifications at all skill levels*'. The new offer includes:

- new pathways at level 2
- new maths and English qualifications at Level 1
- a reformed vocational Level 3
- '*simplified*' regulatory system for higher level study
- a commitment to develop new Higher Technical Qualification awarding powers as part of the Office for Student's review of degree awarding powers.

V Levels

The paper announces that government will replace the range of vocational technical qualifications at Level 3 with 'V Levels', which will sit alongside A Levels and T Levels as the only pathways of vocational qualifications at level 3 for 16-19 year olds.

It is proposed that V Levels will be offered in a range of vocational subjects covering key employment sectors, based on nationally set content. The content will be linked to occupational standards set by Skills England, in collaboration with employers. It is anticipated that V Levels will be similar in size to an A level so that they can be combined with other V Levels or A levels. Government has launched a [consultation](#) to explore this further.

Level 2 and English and maths

In response to the [Curriculum and Assessment Review](#), the White Paper announces that it will work to develop two post-16 pathways at level 2. Each pathway will include a relevant qualification and English and maths where needed.

- The Occupational pathway will include employability skills and enrichment activity to prepare students to progress directly into level 2 occupations;
- The Further Study pathway, will develop independent study skills alongside exposure to level 3 teaching and assignments to enable progression to level 3 study.

In addition, government will:

- introduce a new 16-19 'preparation for GCSE Level 1' English and maths qualification for students with grade 2 or below at GCSE. This will be sat before students can take a GCSE resit.
- maintain that Grade 3 (GCSE English and maths) prior attainers will continue to work towards the grade 4 GCSE. For these students, the English and maths funding rate will increase by over 11% in academic year 2025 to 2026, and disadvantage payments will increase by nearly 7%.
- revise the 16 to 18 English and maths Progress Measure and Qualification Achievement Rates, and '*ensure providers are recognised for the progress their students make towards a level 2*'.

UCU response

The sector has undergone much change and churn in relation to qualifications and so we urge time, caution, consultation and piloting in relation to any curriculum and qualification changes. Under the last government we saw far too many reforms that went against the will and expertise of the sector. The rapid introduction of T Levels was the latest example. This, alongside high workloads and levels of stress amongst staff must be factored into timelines.

Our principal concern in relation to the Curriculum and Assessment Review was a call for the end of compulsory GCSE retakes in English and maths for students with qualifications below grade 4. Our concerns relate to student disengagement due to forced study. Sadly, these reforms effectively increase the number of exams students will undertake and exacerbate

recruitment concerns. UCU will make a submission to the Post-16 Level 3 and below pathways [consultation](#).

Information, Advice and Guidance

The White Paper offers a small level of detail on information, advice and guidance. A new Jobs and Careers Service with an *‘enhanced’* focus on skills and careers across Great Britain is proposed albeit without a launch date. The aim of the service will be to *‘align employment more closely with skills and careers advice’*. The UK government says that it will work closely with the devolved governments in Scotland and Wales to ensure the service works well. In the meantime, the National Careers Service will continue to provide support for young people over the age of 13 and adults in England.

The government will provide ‘data-led’ information to propose ‘maps to success’ and study pathways for different occupations alongside salary suggestions. Further information is put forward in the Curriculum and Assessment Review.

UCU response

We note that no funding proposals were put forward in relation to the proposed Jobs and Career Service and therefore repeat [our calls](#) for government to fully fund a face-to-face and professionalised career service.

UCU has grave concerns about the move to data-led information as this drives a solely instrumental view of education and career development as primarily salary led. Such a view risks narrowing the rich educational outcomes students want from their study; and suggests that past experience is a measure of future performance thereby ignoring the risk of shocks such as recession, technological change and structural barriers such as discrimination and bias.

Reduced funding, fragmentation and marketisation of the careers service have led to a lack of coherence and huge variation in the offer, particularly for young people. These variations manifest locally, regionally and indeed across the devolved administrations. Our work on designing a post-qualification application process for higher education admissions put forward a series of [proposals](#) to boost information, advice and guidance for school aged pupils including a minimum of 30 hours of information.

FE workforce

The paper makes it clear that the role of FE colleges (and independent training providers) is key to deliver growth across the Industrial Strategy sectors – and it recognises the role of high-quality teaching in that context. It also recognises the ongoing workforce challenges, including a poor retention rate and high vacancy rates, especially in ‘high-priority’ subjects, and importantly, a visible professional development offer (in contrast to their colleagues in schools). What professional development support is available, is locally created and inconsistent across the

country. Consequently, the paper says, a greater understanding is needed of how best to deliver technical and vocational education, so that FE staff can teach as effectively as possible. It also recognises that up-to-date industry knowledge is crucial for good quality education and training, which is why it wants to scale up partnerships between FE colleges and industry.

The paper makes a commitment to the training and professional development of teachers in a number of ways, including:

Establishing a coherent, career-long professional development pathway for teachers in FE, from initial training through to leadership, and it recognises that many teachers may move in and out of industry.

UCU comment: it would be good to see opportunities for industry experts in education and vice versa; however, thus far, we question whether these aspirations have been fully thought through.

Reforming Initial Teacher Education in FE – the paper says to “raise quality standards”. The paper promises to publish statutory guidance to ensure consistency and quality in Initial Teacher Education content and delivery. It also says that it will work with the sector to review how professional status for FE teachers is achieved, awarded and maintained– and the DfE’s current [call for evidence into FE teacher training and development](#), that UCU will be responding to, is part of that review.

Strengthening the early career experience of new FE teachers – this includes mentoring and structured guidance, to ensure that new FE teachers are supported to foster professional growth and retention.

UCU comment: once again, no reference to parity of pay in the context of retention. There is also no recognition that national collective bargaining (in England) does not function. The current system has failed to meet the aspirations and demands of FE members and needs fundamental change. As part of the [New Deal for FE campaign](#), UCU continues to call for the introduction of binding national bargaining.

A refocus on National Professional Qualifications – to strengthen teaching expertise and leadership across the FE sector.

UCU comment: it is becoming increasingly difficult for government to deny FE teachers parity of pay with schoolteachers; however, we suspect that they are postponing that time as far as possible and one ‘tactic’ to ‘justify’ that is to suggest that FE teachers need to have some sort of standard national professional education qualification first, in the same way that schoolteachers do.

The introduction of new, in-service professional development courses and wider support to strengthen professional development pathways for FE teachers. These are expected to be shorter and more flexible courses to sit alongside National Professional Qualifications in ‘priority’ areas in FE.

Embed industry exchange into in-service professional development

Teachers will be supported to maximise the benefits of digital, data and Artificial Intelligence.

Overall, the White Paper places a great emphasis on skills training post-16 - and a commensurate effort is made to focus on staff training and development too. However, we cannot help but think that some of the intentions in relation to workforce development are ‘aspirational’, or at least long-term, especially given that the £1.2 bn funding appears to be to maintain real-terms per student funding in the next academic year in the context of the demographic increase in 16-19-year-olds. We cannot see how that sort of increase is going to achieve parity of pay for the FE workforce with schoolteachers. Even with the IFS analysis finding that the funding will result in a real terms 3% increase, it still remains short of the increase needed to give the FE workforce parity of pay with schoolteachers.

Adult Education

For those who have lived through at least two periods of Adult and Community Education (ACE) history - the enriching offers in the 1980s and 90s, and the cuts that have followed since, particularly since the introduction of the austerity measures in 2010 - we have become accustomed to ACE being squeezed to the margins. The White Paper does not propose to reverse those cuts; however, there is a different ‘vision’ for adult education in education policy – which was introduced by the last government and instead of reversing that policy, the current government has decided to carry on the baton. This is what we see in this White Paper.

‘Community’ education is not mentioned. Adult education is mentioned once – and addressed in one paragraph. Part of the context, that was introduced by the previous government, is the Lifelong Learning Entitlement – offering not exactly what it says on the ‘tin’, as it were, as it relates to higher education.

UCU comment: we continue to work with organisations such as [Right 2 Learn](#) and Citizens UK on ACE campaigns – and indeed, take leading parts in some of these partnerships. These campaigns relate to ‘traditional’ ACE provision. We also continue to work with DfE to ensure that we have a voice in the ‘new wave’ [our term] of adult education provision, to bring some influence into its direction as much as possible. In summary, we maintain a strong voice in both of these ‘camps’ ([UCU - Save Adult Education](#)).

Section 2: Higher education

Specialisation and collaboration in teaching and research

One of the key themes in the White Paper is the need for higher education institutions to ‘consider how they could specialise in areas of strength and collaborate with others for the benefit of students and the economy’ (p.49). For example, the government seeks to encourage alternative business models, including federated models and partnerships with further education colleges.

In terms of research funding, it talks about a more strategic distribution of research activity across the sector which may mean ‘a more focused volume of research... and stronger alignment to short- and long-term national priorities’ (p.50).

In terms of the workforce, HEIs should ensure that ‘staff pay and performance assessments for academics rewards teaching excellence in the same way that of rewards research excellence’ (p.50). It also claims that greater institutional collaboration over research may bring ‘improved job security through enhanced institutional sustainability’ (p.50).

The White Paper also references the ‘strategic decisions’ by institutions ‘to manage their financial sustainability, including changing their business models by cutting courses or restructuring’ and highlights the government’s support for institutions ‘implementing necessary changes to future proof their business models and operate more efficiently and innovatively’ (p.51).

UCU response

We support the ambition for stronger collaboration between universities, FE providers, and local government, especially to ensure that there is a diversity of subjects, qualifications and modes of study within a local area. However, this will remain purely aspirational without overhauling the current competitive, market-driven funding model.

Under the current market-driven system, we have seen the rapid expansion and contraction of HEIs, adversely affecting staff, students and overall provision. For example, there has been under-recruitment in some universities resulting in course closures, job losses, and a lack of choice for students, while over-recruitment in other universities results in overcrowded learning environments, a stretch on resources and overworked staff. Given this situation, we are disappointed that the White Paper fails to consider moving towards a managed system of student distribution across the sector.

We are concerned that a renewed policy of increasing the concentration of funding in a small number of ‘leading’ institutions risks undermining the health and dynamism of the research base as whole, and reducing the capacity of some regions to undertake necessary research

UCU has long argued for better career pathways and conditions for both teaching-focused and [research-focused academics](#). However, calls to value teaching in academic reward structures or promote institutional research collaboration ring hollow when persistent issues of pay erosion, precarity, and unsustainable workloads are left unaddressed. Finally, we reject the suggestion that course cuts and restructures are the way to ‘future proof’ the sector.

Funding and efficiency

Another theme in the HE section is providing sustainable funding and driving efficiency (section 3.3).

The key proposal is the decision to increase undergraduate tuition fee caps for all HEIs in line with inflation in the 2026/27 and 2027/28 academic years. These future fee uplifts, however, will be conditional on HEIs achieving a higher quality threshold through the OfS’ quality regime.

On research, the key proposals revolve around improving research grant cost recovery and reforming the Research Excellence Framework (REF).

Finally, the report says that the government seeks ‘to better understand concerns within the post-1992 higher education sector about pension provision’, while noting that ‘defined benefit pensions are an important and valued part of staff remuneration’ (p.53).

UCU response

UCU is opposed to placing greater financial burdens on students to fund the overall system. For us, the only way to a sustainable, fair and democratic future for the higher education sector is via a fundamental shift to a publicly funded model of higher education.

At the same time, it will be essential to reverse the reputational and financial damage caused by the introduction of a new [international student levy](#) and the immigration reforms set out in the ‘Restoring control over the immigration system’ white paper.

UCU will continue to advocate for urgent government intervention to prevent institutional insolvency and emergency funding: the government must provide immediate financial support to universities facing acute financial distress, similar to interventions made during the COVID-19 pandemic.

On research, we remain opposed to the Research Excellence Framework and continue to call for it to be scrapped.

Finally, UCU is campaigning hard against detrimental changes to post-92 pension provision, for example at [Southampton Solent](#) and [Northumbria](#), and we have written the UK government expressing our concerns about these recent changes and the need to protect defined benefit pension schemes.

Fair access and widening participation

The White Paper includes a number of announcements designed to forward the ministerial aim of ensuring that ‘*no one will be shut out*’ from study pathways and qualifications.

Funding

- Announces the introduction of means-tested maintenance grants funded by a new International Student Levy. It is proposed that the levy would be introduced by the end of this Parliament for students undertaking courses at Level 4 to 6 that support government ‘*missions and Industrial Strategy*’.
- Replaces the student finance system with the Lifelong Learning Entitlement within academic year 2026 to 2027. Students will have access to tuition fee loans for four years’ worth of education and training with some access to modular funding in certain subject groups.
- Defines the parameters for the funding of education and training.
 - Government responsibility: universal education to the age of 18, and adult learners who are disadvantaged in the labour market and who have low, or no, qualifications.
 - Government and business responsibility: training to increase skills in strategic areas or where there is market failure.
 - Individual responsibility: ‘*own upskilling and progression*’ underpinned by the Lifelong Learning Entitlement (Levels 4-6).

- A youth guarantee, as announced in the Get Britain Working white paper which includes automatic allocation of a place in a college of further education provider for young people leaving school without a post-16 study plan; and investment of £45 million in Youth Guarantee trailblazers.

Improving access and participation

The paper sets out the government intention to improve student experience including drafting a statement of expectations in relation to the supply and demand of student accommodation, extending the Higher Education Mental Health Implementation Taskforce for a further year, endorsing the Office for Students requirement that all registered providers must tackle harassment including antisemitic abuse in relation to training, reporting mechanisms, support and communication, and supporting. In addition, the paper announces the following projects:

- changes the terms and conditions of UK Research and Innovation's postgraduate researcher grants to increase available medical and parental leave and requires all UKRI partner research organisations to have policy on the provision of reasonable adjustments for disabled students.
- Government will consult on making student support for level 6 degrees conditional on the inclusion of break points in degree programmes so that students can gain a Level 4 qualification after year one, a Level 5 qualification after year two and continue to a Level 6 qualification in the final academic year of study.
- reforms the regulation of Access and Participation Plans, moving towards a risk-based approach.
- consultation on the inclusion of break points in degree programmes '*to create a more flexible learning offer*'.
- development of options to address cold spot in underserved regions including setting up a Task and Finish group on how the sector can best widen access for those from disadvantaged backgrounds.
- an exploration of the challenges that lead to disparities in access to PhD programmes.
- Funding for the UK Council for Graduate Education to create an online resources hub for universities to improve access and participation for postgraduate students.
- creates a new market monitoring function, drawing together key datasets to provide a single picture of higher education supply and demand.

UCU Response

We have grave concerns about the fairness of a system that calls on international students to fund maintenance grants for domestic students from low-income backgrounds rather than core public funding. This policy represents an instrumental view of international students rather than one that acknowledges both the £265 billion they contribute to the economy and the educational enrichment that flows from greater international and multicultural diversity. UK international fees are already high and we fear a further increase in fees will make the UK less attractive to international students thereby impacting higher education revenue overall. At a time when UK universities are struggling financially, slicing off a portion of this vital income

stream will be another strain on already stretched resources. We will challenge these proposals via campaign work and our submission to the [government consultation](#)^[2].

UCU disagrees with the stipulation that students should only receive bursary support if they undertake courses that align with government strategy. This reinforces structural inequalities and risks a two tier education system whereby student's subject choices are stratified and constrained by socioeconomic status. If government wishes to maintain its stance that 'no one is shut out', this condition must be removed.

The post-16 sector is suffering a funding and recruitment crisis. The system requires greater investment and we will continue to campaign according to our [established policy and research](#)^[3]. Our [report](#)^[4] on student experiences paints a picture of a failing funding system that is leading to financial hardship as well as significant impacts on student wellbeing and mental health. It is mirrored in the recent Hepi publication, [Student Working Lives](#), which demonstrates the growing prevalence and impact of paid work among students. The proposals in this White Paper, in particular, the move from the student finance system to the Lifelong Learning Entitlement is effectively a name-change that does little to address the very real impact of poverty on students. We note that the White Paper is almost silent on part-time and mature students.

The modularisation proposals must be considered alongside workload, learning consolidation and accumulated learning processes.

The guaranteed place for all 16-year olds is an important development, however, key to this translating into education, employment or training outcomes must be funding to support teaching, the delivery of a broad and balanced curriculum, SEND, information, advice and guidance and mental health support. These cohorts may see higher attrition rates when compared with students who have actively selected a college and so institutions must not be punished, either financially or by the accountability system where matching proves unsuccessful in relation to attainment and/or drop out rates. For students with lower prior attainment, particularly in relation to GCSE English and maths, government must allow for a flexibility of delivery.

UCU has been involved in much [research](#) and campaign work^[5] to support fair access at student, [postgraduate researcher](#) and staff level. UCU welcomes the developments in relation to the rights of postgraduate researchers particularly as UCU has led much of the campaigning work in this regard. Our research exploring the experiences of postgraduate researchers who are [disabled](#)^[6] and who are [Black](#) shows some of the very real challenges here. UCU would welcome the opportunity to support the Task and Finish group on widening access for students from disadvantaged backgrounds. More detail will be required to support further comment on the impact of a move to a risk-based approach to Access and Participation plans and we await this with interest. Any moves must ensure the upward trajectory of the entire sector in this regard.

Governance and academic freedom

The White Paper hints at problems with current HE governance ('Governing bodies should not sign off unachievable plans' and that a responsible approach should include keeping an eye on 'executive pay' (p.53).

The main recommendations in the report are support for the Office for Students' strengthening of its management and governance conditions for registration and for the review led by the Committee of University Chairs into their HE code of governance (p.54).

On academic freedom, the white paper highlights the new duties of higher education institutions around freedom of speech and reaffirms the UK government's commitment to bring in a new complaints scheme at the Office for Students (OfS) for staff and external speakers. It also mentions the government's intention to give the OfS stronger regulatory powers in this area (p. 67).

UCU response

We believe that the governance reform proposals are too limited. The White Paper offers vague assurances of greater oversight yet fails to commit to improved staff and union representation in institutional decision-making. UCU is calling for a full and urgent review of HE governance arrangements and will continue to work with organisations such as the [Council for the Defence of British Universities](#) in this campaign.

In terms of free speech and academic freedom, UCU has major doubts about the government's decision to continue with key parts of the Freedom of Speech Act. We also have concerns about the suitability of the OfS to carry out its regulatory duties in this area (see for example, its handling of the investigation at the [University of Sussex](#)).

Throughout the document, there is no recognition of how policies like the tuition fee-based funding model or how issues like [casualisation](#) and [increased technological surveillance](#) are having a negative impact on academic freedom. Moreover, the emphasis in the White Paper on the need for higher education and research to align with 'priority sectors which support the Industrial Strategy and the Plan for Change' (p.103) risks further marginalising the arts, humanities, and social sciences.

Section 3: Data and Artificial Intelligence

The White Paper suggests the use of Artificial Intelligence in four key domains: skills development for the wider population; education delivery; system management; and curriculum design.

Delivery and curriculum

The paper states that '*harnessing the power of Artificial Intelligence*' will support excellent teaching and inspirational leadership. In Further Education, the government states that it wants staff to 'have the confidence to use technology *'wisely and well'* to deliver world-class teaching. It is proposed that data will be used to improve provider and policymaker insights into how the system is delivering and enable evidence-based decisions and links to pedagogy that drive

improvements in learning. There is also a stated ambition for government to work with the further education sector and internationally towards a shared approach on the safe and effective use of artificial intelligence in further education. The paper proposes working with Edtech companies to trial products.

Skills development

The White paper sets out a commitment to upskill 7.5 million UK workers with ‘essential’ artificial intelligence skills by 2030 via a digital and Artificial Intelligence skills package. In relation to education delivery, technology and Artificial Intelligence are identified as tools that *‘will not replace or automate teaching, but it can transform and improve it’*. It is stated that new tools can help to alleviate workload pressure, improve productivity and provide new insights into learners’ patterns and progress.

System management

The White Paper states that Skills England will *‘harness’* Artificial Intelligence and data analytics to enhance risk of NEET indicator tools to make it easier to identify young people with ‘NEET characteristics’ in each local area authority; and to ensure that employment and skills support is responsive to changing economic demands.

Curriculum design

Government will review the National Standards for Essential Digital Skills to ensure they remain relevant in the context of rapidly developing technology including artificial intelligence tools. The initial roll out of the Growth and Skills Levy will initially be rolled out in ‘priority areas’ such as Artificial Intelligence and digital skills.

UCU response

The White Paper calls for higher education institutions to remain a space for intellectual rigor as well as the development of ‘a specialist and prestigious further education sector so that everyone can access opportunities through high-quality training’ (p.29). These objectives must be protected and indeed enhanced in light of the rapid development of artificial intelligence. We believe any exploration the use of artificial intelligence for staff and students, government must work in social partnership with education trade unions from the beginning of the process by default and design rather than in consultation or in limited user trials at the end of the process.

We are clear that artificial intelligence alone cannot address the chronic underfunding in the sector alongside, the challenges we see in relation to pay and conditions, workload, curriculum and assessment and staff and student mental health. Nor can it mimic the integral importance of the staff-student relationship.

Our own research with [members](#) and [branches](#) has revealed that UCU members are interacting on daily basis with Artificial Intelligence systems in their working lives. Some members are choosing to use these systems, others are being forced to interact with them because of the actions of students or their employer. Our members are both keen users of AI systems and

severe sceptics, plus every position in between. It is clear from the survey that we need to ensure members better understand their data rights and that UCU continues its fight to ensure members can draw clear lines between work and home life through fighting for the right to disconnect. UCU is participating in the Education and AI project, a seven month action learning project supported by the TUC and Connected by Data to foster collaboration between education trade unions; establish clarity on key union issues on technology and AI in education; facilitate union led development of proactive bargaining strategy and advance education union influence on technology and education policy issues.