



A RESPONSE FROM THE BRITISH ACADEMY TO THE HIGHER EDUCATION FUNDING COUNCIL FOR ENGLAND'S PROPOSALS FOR STUDENT NUMBER CONTROLS AND TEACHING FUNDING FOR 2013-14 AND BEYOND – MAY 2012

INTRODUCTION

1. The British Academy, the national academy for the humanities and the social sciences, welcomes the opportunity to respond to the HEFCE consultation on student number controls and teaching funding for 2013-14 and beyond. The British Academy previously responded to the HEFCE consultation that preceded this¹, as well as offering advice to the Council on strategically important and vulnerable subjects (SIVS) (in June 2011).² We also submitted a response to the government on its White Paper *Students at the Heart of the System* last year.³ Our comments here build on points made in those earlier submissions.
2. We have already expressed concern at the nature and speed of the government's reforms for higher education, particularly with regard to the impact on postgraduate education and vulnerable areas of provision such as languages (and related area studies) and quantitative skills. It is vital that HEFCE is vigilant about the consequences of the government's reforms in these areas, and places itself in a position to react, or to coordinate reaction, should risks and issues be identified.
3. Our response focuses on the proposals contained in Part 3 of the consultation document – on the funding for teaching from 2013-14. We have only two specific responses in relation to Parts 1 and 2 on student number controls. We believe that other organisations, namely higher education institutions, are better placed to offer more detailed comments in this area. We note that in its announcement about the 2012-13 number controls HEFCE⁴ excluded strategically important and vulnerable

¹ Available on our website at <http://www.britac.ac.uk/policy/listing.cfm>, date 1 September 2011

² Available on our website at <http://www.britac.ac.uk/policy/listing.cfm>, date 21 June 2011

³ Available on our website at <http://www.britac.ac.uk/policy/listing.cfm>, date 21 September 2011

⁴ [17 October 2011](#)

subjects (SIVS) from the reduction necessary to create a margin of places for reallocation. The most recent announcement⁵ came after this consultation was published, and was subject to Government agreement, so we understand why there is no detail about the size of the margin in the consultation proposals. However, we trust that in its decisions on the criteria for how the margin of 5000 additional places is created, the Funding Council will continue to exempt the current named SIVS from any reductions. Doing this will minimise any incentives for providers to move away from these subjects, and so remove any contradiction between the student number control policy and the policy on strategically important and vulnerable subjects.

4. Our other comment regards the suggestion in paragraph 149 on monitoring average course lengths. This needs to be approached with caution. From a disciplinary perspective, there may well be many reasons to shorten or extend the length of a course to improve quality, offer additional choice or remain internationally competitive. For example, four year undergraduate degrees providing students with an opportunity to exit with an honours degree after three years or continue to achieve a masters degree are common in some disciplines, but not in others. There is potential for this proposal to negatively impact on those institutions that wish to develop new provision.
5. The British Academy recently published a Position Statement, Valuing the Year Abroad⁶ calling on the government to recognise the strategic importance of the year abroad, and to minimise the financial disincentives involved in an extra year's study. Following the report from the Joint Steering Group on UK Outward Student Mobility⁷, the Government announced that tuition fees for students studying a year abroad will be subject to a lower cap, and that HEFCE grants will be available to institutions when their students participate in a year abroad. This means that institutions will receive up to 40% of the full fee when a student studies abroad. These developments came after HEFCE published these consultation proposals, but we trust that these arrangements become an established element of the new funding regime from 2013-14.

COMMENTS ON PART 3 – PROPOSALS FOR FUNDING TEACHING FROM 2013-14 ONWARDS

High cost subjects (question 7)

6. In light of the government's reforms of the tuition fee regime, which shifts the balance of contribution for higher education funding away from HEFCE and towards students,

⁵ [27 April 2012](#)

⁶ Available on our website at <http://www.britac.ac.uk/news/news.cfm/newsid/725>

⁷ Available at <http://www.international.ac.uk/policy/policy-positions-and-statements/mobility.aspx>

it is important that those institutions offering disciplines that cost more than the maximum fee allowable are not penalised. Therefore, we welcome HEFCE's proposals to continue to provide additional funding to support some of those subjects. On behalf of humanities and social science (HSS) disciplines we also welcome the decision to split price group C to enable support for some of the more expensive disciplines in this area – doing this ensures additional and necessary support for archaeology, which is covered by the new price group. We would expect HEFCE to continue to monitor costs in this price group to identify if any others should be moved into the new C1 price group – our particular focus in this regard would be on the other HSS disciplines in price group C.

Postgraduate provision (question 8)

7. We are pleased to see HEFCE acknowledge the value of postgraduate provision with the proposal to reinstate funding levels for subjects in price bands to 2011-12 rates. We share HEFCE's concerns that students entering undergraduate provision from 2012 (and so subject to a fee of up to £9000 pa) may be deterred from future postgraduate study (as stated in paragraph 193). This in turn may have a negative impact on the range, diversity and choice of provision at this level.
8. Such reduction of provision would indeed appear probable, if institutions' financial considerations lead them to retreat from postgraduate education. Given that one of the key difficulties for students progressing to postgraduate study is the absence of publicly funded tuition fee and maintenance loans, some course provision may be at risk should students with increased undergraduate tuition fee debt decide not to move on to postgraduate study. We believe that HEFCE should consider the case for support for subjects in price band D: although current average fee levels may cover the costs of provision in these subjects, it does not mean they are immune from students' decisions to avoid additional debt.
9. One of the major challenges in this area is the lack of suitable data and information about the postgraduate sector. We welcome HEFCE's decision, in paragraph 196, to increase its understanding of the taught postgraduate market. We would expect information obtained to be shared with relevant organisations. We do not believe, however, that HEFCE should wait until academic year 2015-16 (the point at which students subject to higher undergraduate fees are able to enter postgraduate education) to review its support for postgraduate provision. It should do so when the data suggests it necessary, which is likely to be before 2015-16.

Part-time undergraduate provision and alternative modes of study (questions 10 and 11)

10. The British Academy agrees that there should be support for flexible learning to enable a wider range of people to engage in academic study. Part time degrees and accelerated or intensive degrees are a key part of this approach and so we welcome

HEFCE's support in this area. We note, however, that HEFCE does not propose extending this support to all subjects – owing to its view that tuition fees for price band D subjects should be able to meet the costs of this provision. We would expect HEFCE to monitor carefully areas that it does not currently fund and review the situation as appropriate. The current level of change taking place in the undergraduate sector makes it difficult to predict the impact on disciplines.

Student opportunity (questions 13 and 14)

11. We believe that HEFCE is right to continue to support institutions in their work to increase access and widen participation to undergraduate education. We note, however, that there are no proposals with regard to this issue in postgraduate education, where the general level of understanding is weaker, but the challenges are at least as great. We would expect to see greater attention to this in future proposals.

SIVS (question 17)

12. In our advice to HEFCE last year on SIVS, we commented on:
 - The importance of collaboration between funders to safeguard SIVS given the limited public funds available
 - The complexities of deciding what subjects are, at any one time, vulnerable
 - The need to develop better monitoring mechanisms to identify emerging trends and threats to provision
 - The need to provide incentives to institutions to encourage collaboration to support vulnerable disciplines
 - The importance of sustainable, integrated, coordinated, long-term solutions rather than a series of disconnected initiatives
13. We believe the new approach to SIVS proposed by HEFCE will address some of our comments above – specifically the first three – but we see only quite general information in the proposals about incentivising collaboration and developing coordinated responses (in paragraph 331). This is certainly an aspiration shared by all organisations with an interest in supporting SIVS, but is likely to need careful management and planning to bring together multiple stakeholders to maximise the opportunities of working in partnership. We hope that the final proposals, refined following this consultation, will map out in more detail how HEFCE will encourage this approach. In particular, it would be useful for HEFCE to consider how the various elements of support it proposes in paragraphs 307 to 332 fit into an overarching strategic framework that ensures there is capacity for long-term coordinated collaboration.
14. We look forward to further opportunities to work with HEFCE to support vulnerable disciplines, in particular languages and related area studies and quantitative skills. We will continue to liaise with learned societies and subject associations to understand the

pressures and challenges in humanities and social sciences disciplines, and will offer further advice to HEFCE as appropriate. It is important that HEFCE's approach is sophisticated enough to understand some of the subtleties of vulnerable provision. For example, there may well be areas of study that, as they develop, shift the balance of provision to cover more modern periods (e.g. language and literature departments moving away from early periods of literature in favour of modern literature, art and film) thus leaving a dangerous gap in coverage of foundational aspects of national and international history and culture. This is an example of an issue that would not be identified through a straightforward collection and analysis of student applications or course availability data. For this reason, it is vital that HEFCE gathers as much intelligence from learned societies and subject associations as is possible.

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