The British Academy

British Academy response to the Department for Education's consultation on supplementary higher education reform options

6 May 2022

Background

This consultation is being conducted by the Department for Education, following the Government's response to the Review of English Post-18 Education and Funding the Department launched in 2018, and the independent panel chaired by Sir Philip Augar, which reported to the Review in 2019.

The British Academy submitted a response to the independent panel's call for evidence,[1] and responded to the publication of the independent panel's 2019 report,[2] emphasising the vital role of Social Sciences, Humanities and Arts for People and the Economy (SHAPE) disciplines to a thriving economy, vibrant culture, and cohesive society.

The Academy's response to this consultation builds on our previous engagement with the Review of Post-18 Education and Funding. As the National Academy for the humanities and social sciences, we are responding to the questions in the consultation that have a direct impact on the ongoing health and vibrancy of our constituent disciplines.

[1] British Academy (2018), Review of post-18 education and funding: call for evidence, A submission from the British Academy.
[2] British Academy (2019), The British Academy responds to the Augar Review of Post-18 Education and Funding.

Response

Student number controls (SNCs)

Question 1: 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? Please explain your answer and give evidence where possible. If you consider there are alternative interventions which could achieve the same objective more effectively or efficiently, please detail these below.

The Academy is concerned by the potential consequences the use of SNCs could have on access to, and the health of, Social Sciences, Humanities and Arts for People and the Economy (SHAPE) disciplines, despite the good outcomes the vast majority of currently provided courses offer. We wish to raise specific concerns about the statements made in the consultation document regarding what constitutes 'best outcomes' and the statement that "higher-cost courses [often being] better investments for students, society, and the economy."

The skills and learning gained by SHAPE graduates are essential to the strength, success and resilience of the UK. SHAPE graduates underpin key sectors of the economy, with eight of the ten fastest growing sectors and five of the top six R&D performing industries employing more SHAPE graduates than graduates from other disciplines.[3] In addition, 61% of leaders of FTSE 100 companies have backgrounds in SHAPE, in subjects ranging from business and management to languages and history. SHAPE graduates are also essential to the innovation and entrepreneurship which is shaping the future UK economy. SHAPE graduates have founded over half of the UK's leading start-ups to great success; as many of the UK's most successful start-ups are founded by history graduates as by engineering graduates, and languages graduates have founded more successful start-ups in the UK than math graduates.[4]

For individual students, SHAPE degrees offer diverse and rewarding careers; employability rates are the same across SHAPE as they are across STEM.[5] Out of the top ten subjects with the highest average annual wage growth rates, seven of these are SHAPE disciplines, including law, communication, English, history and philosophy, business, psychology and creative arts and design.[6] SHAPE degrees also offer greater flexibility in career paths, offering resilience to changes in the economy.[7] This is in part due to the broad skills developed by studying SHAPE disciplines, such as communication, collaboration, and critical thinking, which open students up to a range of roles that provide value to society and the economy in sectors as diverse as trade, education, manufacturing, and healthcare.[8]

These skills reflect the motivations of students who pursue degrees in higher education. While many are motivated to pursue higher education as it "provides a bridge to a stable future", they are also driven by their interest and passion in a specific subject, the ability to become more independent through the experience provided by higher education, the ambition to make a positive difference, and an intellectual curiosity about different societies and perspectives.[9] For these students therefore, it is wholly incorrect to assume that a good outcome is purely dependent on their salary post-graduation.[10]

[3] Guthrie, S. et al. (2022), Understanding R&D in the social sciences, arts and humanities (SHAPE). RAND Europe (forthcoming).
[4] Analysis of undergraduate degrees of 100 FTSE CEOs and undergraduate degrees of 204 start-up founders (2021). Analysis undertaken by Tom Hunter, LSE.
[5] The employment rates of graduates in the UK workforce - 88% for graduates of arts, humanities and social sciences, and 89% for science, technology, engineering and maths. British Academy (2020), Qualified for the Future: Quantifying demand for arts, humanities and social science skills.
[6] British Academy (2020), Qualified for the Future: Quantifying demand for arts, humanities and social science skills.
[7] British Academy (2017), The Right Skills: Celebrating Skills in the Arts, Humanities and Social Sciences and British Academy (2020), Qualified for the Future: Quantifying demand for arts, humanities and social science skills.
[8] British Academy (2017), The Right Skills: Celebrating Skills in the Arts, Humanities and Social Sciences.
[9] Unite Students, in partnership with the Higher Education Policy Institute (2019), The New Realists and British Academy (2022), SHAPE Skills at Work: Case studies from SHAPE graduates (forthcoming).
[10] The Academy's recent responses to the Office for Students' (OfS) consultations on regulating student outcomes, and constructing student outcome and experience indicators, further elaborate on our concerns related to how outcomes are defined as 'poor', and the need to understand context alongside these outcomes, given their complexity.

While we agree that higher education study should lead to positive outcomes for students, the economy and society, the ways in which the quantifiable outcomes of higher education are defined in the consultation do not fully capture the complete story of a student's journey into and through higher education, and on to the labour market. Prioritising provision based on a restrictive definition of positive outcomes risks increasingly negative consequences for students, society and the economy, as the UK misses out on equipping future generations with the strategically important, valuable, higher-quality provision they need. The Academy would therefore urge the Department to reconsider its understanding of positive outcomes and their relationship to the concept of 'value', which the consultation document uses in relation to value for money.[11] Instead, the Academy would urge the use and understanding of a broader concept which considers the value – including more subjective value-added - of higher education for students, the economy and society. By doing so any metrics and conclusions are better able to recognise that student outcomes are the product of several factors including, but not limited to, institutional reputation and location; the sex, ethnicity, and socio-economic background of the student; and government policy and the performance of the economy at the time of study and graduation.[12]

Question 2: 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.

As noted in our response to question 1, the Academy does not support the use of SNCs due to the consequences this could have across the higher education sector, for SHAPE disciplines, and for student choice. Our response to this question further elaborates on how SNCs could have an impact at the sector level, and for specific subjects.

This diversity of student background, interest and motivation will be reflected in the growing number of 18-year-olds expected over the next decade, as referenced in the consultation document.[13] According to UCAS projections, there will be one million applicants to UK higher education by 2026 – 40% of which will be attributed to the growing number of 18-year-olds.[14] This increased demand for higher education provision will undoubtedly include the SHAPE disciplines, which currently account for over 60% of higher education student enrolments in England as of 2020-21.[15] The Academy urges the Department to ensure that the aspirations of students are not impacted by a restriction of provision.

Any such restriction could be worst felt by students from lower socio-economic backgrounds. This is due to structural inequalities in the quality and experience of compulsory education,[16] which could make it more difficult for disadvantaged students to meet entry requirements on courses which may become increasingly competitive, should demand outpace supply. In addition, it is imperative that the breadth and diversity of provision should be embedded throughout the regions of England in order to ensure students can access the course they aspire to complete and acquire the skills they need to succeed. Students from low socio-economic backgrounds tend to display

[11] Department for Education (2022), Higher Education Policy Statement and Reform Consultation.
[12] Belfield et al (2018), The relative labour market returns to different degrees. Institute for Fiscal Studies.
[13] Department for Education (2022), Higher education policy statement & reform consultation, Consultation document, page 33.
[14] UCAS (2022), Call for evidence to Public Accounts Committee: Financial sustainability of the higher education sector in England.
[15] HESA (2022), Figure 13: HE student enrolments by CAH level 1 subject and sex, academic years 2019-20 to 2020-21.
[16] Social Mobility Commission (2017), Low income pupils' progress at secondary school.

lower levels of geographical mobility into university, as do care-leavers and those with caring responsibilities, leaving them reliant on few or single providers for their desired subject. SHAPE subjects such as design, creative and performing arts, and media, journalism and communications would be particularly impacted by any subject level controls, as they have high numbers of students from low socio-economic backgrounds and the highest proportion of students with a reported disability, including cognitive disabilities.[17] A student number cap based on subjects could therefore undermine government priorities pertaining to levelling up and widening participation.

Rather than considering a reduction in size of the university sector, a well-supported post-18 education system, across higher education, further education, and other forms of provision, will help ensure universities, colleges and other providers can continue to provide value to society through their teaching, research and knowledge exchange activities.[18] In terms of alternative interventions, we would encourage the Government to further consider how information, advice and guidance – informed by national need as well as by the benefits to individual learners –could play a greater role in supporting informed student choice that bolsters their aspirations all while leading to positive outcomes. Such an approach would align with the OfS' 2022-25 strategy which recognises the role of "effective information, advice and guidance [...] in driving high quality outcomes".[19]

Question 3: 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.

We appreciate the broad categories of quantifiable and non-quantifiable outcomes outlined in the consultation document, which include the benefits of higher education to society. As outlined in our response to question 1, a broad approach to determining higher education outcomes allows for a more comprehensive understanding of how higher education widely benefits individuals, the economy and society.

The Academy believes that SHAPE disciplines should also be included under the 'strategically important' category outlined in the consultation document. The insights that SHAPE disciplines yield are among the UK's greatest strengths and are crucial to tackling the most significant challenges our world faces, from climate change, to meeting the needs of an ageing society, and tackling poverty.[20] In addition, SHAPE disciplines are vital in current efforts to maintain internal excellence in research and innovation. The researchers of the future will need to be able to apply knowledge from across the discipline range as the challenges they look to solve become increasingly complex.[21] In order to deliver a truly Global Britain we must build strong and productive networks which seek to understand the nature of global problems and deliver solutions. Mutual understanding across different countries, languages and jurisdictions is fundamental to its success.[22] Languages and language learning are strategically vital in the context of Global Britain, as we look to recover from the COVID-19 pandemic and strengthen our commercial, soft power, defence, security, cultural, and research relationships across the world.[23] It has been estimated that our language skills deficit could cost the UK economy up to 3.5% of GDP per annum.[24]

[17] British Academy (2021), British Academy response to the Office for Students' consultation on recurrent funding, 2021-22.
[18] Vignoles, A. (2022), Shrinking UK universities to boost vocational skills is short-sighted, *Financial Times*.
[19] Office for Students (2022), Office for Students Strategy 2022 to 2025.
[20] Morgan Jones, M., Abrams, D. and Lahiri, A. (2020), Shape the Future: how the social sciences, humanities and the arts can SHAPE a positive, post-pandemic future for peoples, economies and environments, Journal of the British Academy, 8, 167-266.
[21] British Academy (2021), Submission to the Spending Review and British Academy, Association of School and College Leaders and the All-Party Parliamentary Group on Modern Languages (2021), The future of languages in the UK – Submission to the Comprehensive Spending Review.
[22] British Academy, Arts and Humanities Research Council, Association of School and College Leaders, British Council and Universities UK (2020), Towards a National Languages Strategy: Education and Skills.
[23] British Academy, Academy of Medical Sciences, Royal Academy of Engineering and Royal Society (2019), Languages in the UK: a call for action.
[24] Foreman-Peck, J. and Wang, Y. (2014). The Costs to the UK of Language Deficiencies as a Barrier to UK Engagement in Exporting: A Report to UK Trade & Investment and Ayres-Bennett, W. et al. (2022), The economic value to the UK of speaking other languages, RAND Europe and the University of Cambridge.

Sustaining the pipeline of skilled arts, humanities and social science graduates will also help fuel the largest and fastest growing sectors of the economy as it continues its recovery following the COVID-19 pandemic.[25] SHAPE graduates hold strategically important roles in service industries, which accounted for 81% of total UK economic output in 2018 and 83% of workforce jobs in June 2019. The valuable skills SHAPE graduates have, and that employers value, such as communication, collaboration, research and analysis, independence, creativity, and adaptability, along with the ability of SHAPE graduates to build flexible careers across sectors and roles, mean that SHAPE disciplines – and the role they play in helping individuals and organisations understand and navigate our rapidly changing world – are essential to the UK's current and future prosperity.[26]

Minimum eligibility requirements (MERs)

Question 5: 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? Yes or No. Please explain your answer and give evidence where possible.

The Academy does not support the introduction of minimum eligibility requirements. Setting minimum eligibility requirements makes several assumptions that could have unintended consequences on access to – and participation in – higher education.

The first is that a student's achievement at Level 2 and/or 3 is a pure reflection of their academic potential. We know that there are many conflating factors, including student characteristics, structural inequalities, education provision and assessment methods, that mean results are not necessarily a fair reflection of this potential.[27] This has been clearly highlighted and demonstrated during the COVID-19 pandemic when the disruptions to the delivery of compulsory education compounded existing inequalities long observed across socio-economic background, race and ethnicity, gender and educational need.[28] While the precise impact of these inequalities is not yet fully known, data from previous instances of education absence suggests that the disruptions associated with the pandemic will have serious long-term consequences on the progression of students from lower socio-economic backgrounds. This will ultimately impact these students' labour market prospects and have a negative impact on intergenerational mobility.[29] Another key point here with respect to inequality of access is that a MER will not prevent access for those who have the means to self-fund their studies. The impact of the policy in terms of those entering higher education will also be uneven because it only effects those who are reliant on the public subsidy built into the loan system. This could have a negative net impact on access and participation across higher education, including within high-return subjects such as business and computer science, as evidenced by the Institute for Fiscal Studies. [30] This research also highlighted a possible impact on access to the creative arts and design and communications disciplines which currently account for the highest proportion in any broad subject group of students to have reported a disability, including cognitive or learning disability, and mental health conditions.[31]

The second assumption is that the point at which eligibility requirements would be assessed as met – either Level 2 (GCSE equivalent) or Level 3 (A level equivalent) – is a fair and equal playing field. As highlighted above, the structural inequalities in the quality of compulsory education may make it more difficult for less-advantaged students to meet entry requirements into higher education.

[25] British Academy (2021), Submission to the Spending Review.
[26] British Academy (2020), Qualified for the Future: Quantifying demand for arts, humanities and social science skills.
[27] Office for Students (2022), Insight brief: Schools, attainment and the role of higher education and Gorard, S. and Siddiqui, N. (2019), How trajectories of disadvantage help explain school attainment, SAGE Open.
[28] British Academy (2021), The COVID Decade: understanding the long-term societal impacts of COVID-19.
[29] British Academy (2021), The COVID Decade: understanding the long-term societal impacts of COVID-19.
[30] Drayton, E. and van der Erve, L. (2022), The impact of student loan minimum eligibility requirements, Institute for Fiscal Studies.
[31] British Academy (2021), Consultation on Recurrent Funding 2021-2022, Office for Students.

This is also subject specific, as changes to the curriculum and severe assessment of some subjects has contributed to falling numbers at Level 2 and Level 3, which have been compounded by reduced availability of teachers and provision.[32] There are clear trends in many languages subjects, for example, that despite the Government's welcome ambition for virtually all learners to study a language to age 16 as part of core education, in practice access is increasingly related to the wealth and performance of the school, risking the creation of "elite subjects" and unfair access.[33] It is critical, then, that the social mobility provided by higher education be evaluated by the wide-ranging economic and social value-add it provides to diverse student cohorts pursuing a range of objectives through study, including gaining specific skills and expanding their knowledge. As "prior attainment does not always capture future potential," contextual admissions tools can play an important role in providing students with the opportunity to enter higher education and still gain the human capital during their studies to make it worthwhile both individually and for society. [34]

Entry qualifications also vary by subject, and this would likely have a disproportionate effect on some subjects and how students transition to study beyond Level 3. The use of MERs could undermine the so-called 'Robbins principle' that first emanated from the 1963 Robbins Report, which states that "courses of higher education should be available for all those who are qualified by ability and attainment to pursue them and who wish to do so."[35] This principle has been successful in ensuring healthy levels of enrolment in key subjects and supporting student aspirations, all while supporting the diversity and autonomy of the higher education sector. The MERs being proposed in this consultation supposes a one-size-fits-all approach to determining who can benefit from higher education. This may be short sighted with respect to the SHAPE disciplines, blocking aspiration that could lead to good outcomes. For example, minimum grades in core subjects such as GCSE maths might not be the best reflection of a student's capacity to succeed on certain SHAPE courses at undergraduate level. It is therefore questionable whether a minimum entry qualification for this qualification should prevent a student from studying SHAPE subjects, including those of strategic value, such as languages.[36]

Alongside these considerations, the Academy does recognise, as outlined by the Government in the consultation document, the importance of ensuring students are well equipped for post-18 study that will allow them to succeed. Should the Government choose to proceed with the introduction of MERs, these requirements will need to be aligned with the standards and contextual tools used by providers in assessing students' suitability to study a Level 6 qualification, and the mechanisms in place to ensure quality of provision. There should also be a greater focus on continued equipment of all students throughout their education and working life in core skills such as maths and quantitative analysis, as well as strategically valuable focus on languages. The British Academy continues to call for the adoption of structures that will allow for quantitative skills to flourish at all levels, to support a long-term culture change across education and employment where people are as comfortable with words as they are with numbers, and where people are pursuing studies in subjects they are passionate about, all while acquiring a wider range of skills needed for the labour market.[37] The Academy's joint statement with the Royal Society on Core Maths also articulates the importance of ensuring that students have more options to gain a mathematics qualification beyond the age of 16 that will provide them with the quantitative skills needed to succeed in future studies and employment.[38]

An MER would act as a control on the supply side of the higher education system, by restricting those who have access to the student loan book. But it is also important to consider demand for higher education in England (meaning level 4 and above). The intended growth in provision at

[32] British Academy (2021), New British Academy President welcomes increased take-up of SHAPE subjects but cautions more work needed to reverse the five-year decline.
[33] British Academy, Association of School and College Leaders and the All-Party Parliamentary Group on Modern Languages (2021), The future of languages in the UK – Submission to the Comprehensive Spending Review.
[34] The Sutton Trust (2021), Universities and Social Mobility: Summary Report.
[35] Committee on Higher Education (1963), Report of the Committee appointed by the Prime Minister under the Chairmanship of Lord Robbins.
[36] British Academy, Arts and Humanities Research Council, Association of School and College Leaders, British Council and Universities UK (2020). Towards a National Languages Strategy: Education and Skills and Ayres-Bennett, W. et al. (2022), The economic value to the UK of speaking other languages, RAND Europe and the University of Cambridge.
[37] British Academy (2015), Count Us In: Quantitative Skills for a New Generation and British Academy (2022), Measuring our Progress: A report on Count Us In (forthcoming).
[38] British Academy and Royal Society (2022). Joint statement on Core Maths qualifications.

Levels 4 and 5, which the government addresses as part of this consultation, must also be considered when assessing the potential implications of introducing minimum eligibility requirements as demand for higher education continues to increase. To provide students with as many pathways as possible to access the benefits associated with higher education, provision at Levels 4 and 5 may need to mature before any considerations pertaining to the introduction of minimum eligibility requirements be taken forward. This would allow for further understanding of the uptake and demand of provision at these levels, and how it aligns with the principles that support the health and diversity of the sector. Moreover, there is also a warning from history when considering demand for all higher education in England; the historical development of the higher education sector over recent decades is a story of demand driving supply, not the other way around.[39] Previous attempts by government to control or limit supply have often succumbed to social and political pressures for more higher education over time. This should be borne in mind in the development of any such policy.

[39] Mandler, P. (2020) "The Crisis of Meritocracy: Britain's transition to mass education since the Second World War" Oxford University Press.