

Response ID ANON-J6XW-KY18-V

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:
Oliver Morris

2 What is your email address?

Email:
oliver.morris@ukmusic.org

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. :
UK Music

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.:

SNCs should not be implemented. It is a very blunt instrument to tackle a nuanced and complex issue. As we have discussed with Creative Industries partners in the CIC the imposition of controls would rely upon a robust and fair definition of 'good' graduate outcomes. In responding to Office for Students recent consultations on The Construction of Student Outcomes, industry members of the Creative Industries Council set out our concerns around the narrow way outcomes are measured. We have called for a broader, more balanced assessment using a wider basket of indicators. A briefing paper from the Creative Industries Policy and Evidence Centre (PEC) sets out the case in detail, and the CIC member's full summary can be seen in our collective response (with some further detail pulled out in following question responses below). The Government's logic on SNCs is fundamentally flawed for the following reasons. The Government's proposals around SNCs are underpinned by incorrect assumptions around the value of music, arts and creative industries to the UK economy. The proposed criteria for SNCs will disproportionately punish disadvantaged students. The proposals for SNCs fail to recognise that university student cohorts can vary widely across locations and institutions. Monitoring the quality of courses should be enough to ensure value for students and the taxpayer. Courses that are found to be poor should be improved – not scrapped. Also 'quality' can be a very nebulous term with many inter-related and sometimes competing factors at play. We feel positive links with industry demonstrate quality and this is why we established the Music Academic Partnership to nurture and develop the link between industry and education.

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.:

A complex issue with many damaging ways to go about it and unintended consequences that could result (see Q9). We disagree with SNCs however so would simply state that it would be best not to establish the SNCs in the first place.

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. :

Although the suggestion that the measurement of 'good' outcomes should consider quantifiable, societal and strategically important outcomes they would still capture a very narrow view of value.

As noted in CIC response societal value should be considered more widely than currently set out. Music for example has demonstrated time and again its social value. In our latest This is Music Report we showed that despite a tough year for industry due to Covid the value people placed on music in their lives and communities was raised - our survey found that:

75% of the public are proud of the UK music industry and its heritage

59% believe music improves the UK's reputation overseas

74% say music is important to their quality of life

UK listens to 60 billion hours of music a year - the equivalent of 7 million years

1 million people took up a music instrument during lockdown

Our most recent work with Music for Dementia on The Power of Music has highlighted:

In recent years there has been increasing evidence to show the power that music can have in supporting those with a variety of conditions including dementia, depression, autism and those in need of end-of-life support.

According to the BPI's All About The Music 2021, 94% said music helped lift their mood during lockdown and 73% said that they felt more able to manage their anxiety levels thanks to listening to music during the pandemic.

The Creative Health: The Arts for Health and Wellbeing report from the All-Party Parliamentary Group on Arts, Health and Wellbeing said that music therapy reduced agitation and the need for medication in 67% cent of people with dementia.

A study in 2017 by the American Journal of Hospice and Palliative Medicine revealed 96% of patients in a controlled study had positive responses to music therapy. Vocal and emotional interventions were two of the most effective means of improving symptoms which included pain, anxiety, depression, shortness of breath and mood.

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.:

An unintended consequence for music is that as we sit in the wider CAH 25 design, and creative and performing arts in the subset CAH25-02 performing arts - music is in danger of being unfairly penalised if SNCs are set at subject level.

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. :

No. If a student is accepted on to a course, they should be eligible for a student loan. It is the HE provider's responsibility to ensure that students are accepted onto appropriate courses.

There are also structural inequalities in the education system that unfortunately see young people from disadvantaged backgrounds facing more extensive challenges to achieve a place at university under current system and we oppose any further developments that would make the situation even more difficult. Two such examples highlighted below:

Firstly research undertaken by the social mobility charity Sutton Trust 'Making the Grade' found that under new GCSE system in England the grades for disadvantaged pupils fell slightly compared to their peers by just over a quarter of a grade across nine subjects and 'these pupils were also less likely to get a 9 grade - with 1% achieving this compared to 5% of wealthier children.' (Taken from BBC report online.)

Another academic study by Murphy & Wyness (2019) found that 'high-attaining, disadvantaged students are significantly more likely to receive pessimistic grade predictions' which has a direct impact upon university offers as these are based upon predicted not actual grades.

The DfE's own equality analysis for this consultation has identified the unequal impact of this policy: 'Students with certain protected characteristics, such as students from black and ethnic minority groups and those with Special Educational Needs, are likely to be disproportionately impacted as they are less likely to achieve certain levels of prior attainment than other students.'

In line with our fellow CIC members we support the Government's ambition to raise the profile, prestige and value of level 4 and 5 courses by encouraging people to study new Higher Technical Qualifications, but this shouldn't be achieved by limiting access to Level 6 courses through financial restrictions.

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. :

This question makes assumptions as to the necessity for having achieved an English and / or maths GCSE (or equivalent) to be able to successfully study at HE. Creative subjects especially offer alternative route of engagement and development for many who struggle with formal education and / or face additional challenges.

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. :

(See Q11)

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

Not Answered

Please explain your answer and give evidence where possible.:

Not responding a yes or no as we see flaw with MERs as solution in totality.

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

Not Answered

Please explain your answer and give evidence where possible. :

(See Q13)

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

Not Answered

Please explain your answer and give evidence where possible.:

(See Q13)

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?

Not Answered

Please explain your answer and give evidence where possible. :

(See Q13)

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?

Not Answered

Please explain your answer and give evidence where possible. :

(See Q13)

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 number of proposed exemptions - mature students, those studying part time, those with level 4 or 5 qualifications, those who have not met the minimum requirement at level 2 but go on to achieve at level 3 - point to the very significant proportion of prospective students who could be unfairly penalised by the adoption of this policy.

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. :

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. :

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. :

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. :

We support the Government's desire for progress in improving access and participation for under-represented and disadvantaged groups. The national scholarship scheme could be a very positive measure, but we are concerned it could be a sticking plaster when systemic reform is needed to increase access and participation in creative subjects throughout the education system – which is why we welcome (along with our CIC partners) the national plan for cultural education announced in the White Paper.

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.:

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.:

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.:

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:

Annex A - table of interventions and consultation questions

Consultation Questions

Annex B - Our legal basis for processing your personal data