

*Distinction and Diversity  
in Higher Education*



# **GuildHE Response to HEFCE's Teaching Funding Consultation**

## Introduction

GuildHE is, with Universities UK, one of the two officially recognised representative bodies for UK Higher Education. Our members include universities, university colleges, further education colleges and specialist institutions from both the traditional and private (“for profit” and “not for profit”) sectors.

**Consultation question 1: To what extent do you agree that we should discontinue the widening access element of the funding we previously identified as the student opportunity allocation from 2017-18? (Note that if a widening access element is continued, funding for NCOP will be provided in full or in part from the total available for the student premium and this will be further concentrated to reflect the reduced funding available.)**

### Strongly Disagree

We do not agree that the Access element of funding should be discontinued to support the work of the NCOPs. Small institutions use this money to resource much of their access activities due to their small student numbers. Small institutions contribute greatly to widening access to HE and without the fund the infrastructure may not be in place to allow them to continue to engage in this agenda fully.

Small providers are also not usually a big player in the NCOP projects, as they have significantly less resources to contribute. By channelling the money solely to the NCOPs, small providers would lose out on the majority of their access funding.

The NCOP programme is only one way of looking at the problem of widening access to university. It focuses solely on 16-18 participation rather than looking at other barriers which may exist at an earlier age. Whilst we agree a short term plan would be to target those who have the qualifications but at present do not go to university, a longer term aim of access projects should be to raise aspirations and support students to make positive decisions about university at an earlier age. Institutions will be less able to do this if their activity is constrained by the NCOP funding.

Fundamentally we believe that WP should be about providing students with a choice of where and what to study. Cutting smaller/specialist institutions out of this funding will mean many prospective students may not find out about the diverse range of institutions in the sector and much of the outreach in our institutions would be compromised. With our small student numbers we have less OFFA attributed money to work with.

**Consultation question 2: To what extent do you agree with the proposal that the full-time student premium should include a supplement with a weighting based on the recruitment of students who are both at risk and from the most disadvantaged backgrounds?**

### Agree

We believe that money pertaining to retaining students should go to where the need is greatest and are generally supportive of this proposal. This does not necessarily mean that those with the most 'at risk' students (in terms of absolute numbers) should receive the most funding as economies of scale mean that institutions will be able to make their money go further. However in small institutions who recruit a high proportion of at 'risk' students for them (but their absolute numbers would still be considered low compared to a large university) the removal of this funding would mean they would be considerably affected and may have to reduce the support they offer.

We would therefore like to see this proposal worked up further to show how HEFCE propose the money would be distributed (either on a per head basis or as a proportion of total student numbers). We would like to see the money distributed as a proportion of total student numbers in order to not penalise small institutions who do well in recruiting non-traditional students.

**Consultation question 3: What source (or sources) of data do you consider should be used to determine the level of disabled students allocation to each institution?**

There is no easy way to measure the number of disabled students at an institution. The removal of DSA support for levels 1+2 will mean that many students do not officially inform the university of their learning disability. Institutions will have records of those who declare, but at present institutions have different ways of doing this and so would not be able to be audited. If HEFCE could develop a robust way of reporting this internal data through the HESA return then this would be a start, but it will not reflect the true proportion of disabled students at an institution.

A more complex way of redistributing future funding could be based on the known profile of students studying different courses (based on what we already know about the likelihood of students studying certain courses needing additional learning support). This measure would also be far from perfect but could help to mitigate against students not formally declaring their learning disability.

**Consultation question 4: Do you have any other comments or advice on our proposals for supporting widening access and successful student outcomes?**

Fundamentally we believe that the money should be focused on where it is needed most – however this is not always based on the number of students at an institution, but instead on varying factors including the ability for institutions to use their large student numbers to subsidise student outreach and student support activities. Cross subsidising is far harder in institution with small numbers and they really benefit from the additional funding they receive from HEFCE within the SO pot. Changing how this is calculated could significantly reduce the resources small institutions have to recruit and retain disadvantaged students so we would like HEFCE to model the impact these changes will have on the small and specialist sector.

**Consultation question 5: To what extent do you agree that we should discontinue the element of the taught postgraduate supplement for provision that is eligible for the master's loan? (We would retain the supplement for flexible short-cycle provision).**

### **Strongly Disagree**

The danger with removing the supplement at the start of the introduction to master's loans is that it is not yet known what the take up of the loans will be. The supplement at present is an incentive for institutions to keep their masters fee's affordable, and the removal of this supplement may lead to institutions increasing their tuition fees to the full loan amount. The amount of loan available was calculated on the basis of the average fee amount at present, plus some additional money for maintenance in order to incentivise WP students to study at this level. If the loan was used up solely in paying fees, this could have a negative impact on WP participation. Whilst it is not in the gift of HEFCE to force institutions to maintain their masters fee's at about the current level as there is no fee cap– this fund provides a rationale as to why there should not be a race to the top.

**Consultation question 6: If the taught postgraduate supplement for provision that is eligible for the masters loan is discontinued, to what extent do you agree the supplement should be attributable to activity across all subjects, not just clinical, high and intermediate cost subjects?**

### **Agree**

If HEFCE are able to create a formula to re-distribute the funding to support disadvantaged students who are undertaking masters level activity we would be broadly supportive of this proposal. This funding should not be ring-fenced to STEM – but to wherever these students decide to study.

**Consultation question 7: To what extent do you agree that funding should be provided according to the proportion of taught postgraduate students in each institution from the lowest participation areas or in receipt of Disabled Students' Allowance?**

We agree that if the supplement money is to be repurposed then it would be sensible to align it to how we are tackling inequalities in the UG community.

**Consultation question 8: Are there other ways in which you would suggest we should provide teaching funding to address barriers to taught postgraduate participation?**

By removing the postgraduate supplement during the early stages of funding transition you risk jeopardising the success of the master's loans in enabling WP students to access PG courses. As postgrad fees remain unregulated, the reduction of HEFCE funding will inevitably lead to an increase in fees, which may make learning unaffordable.

**Consultation question 9: Do you have any other comments or advice on our proposals for supporting progression to taught postgraduate study?**

In order to ensure that WP spans all levels of HE and not just at UG level, we hope that HEFCE can replicate the emphasis on inclusion at an UG level onto PG studies which is much

needed. Some of the projects and research HEFCE have undertaken to date on WP be could expanded so that the sector knows more about why WP student choose or do not choose PG study. We assume HEFCE will also draw on the evaluation of the Postgraduate Support Scheme.