

Higher education policy statement & reform consultation

Response of the Association of School and College Leaders

A. Introduction

1. The Association of School and College Leaders (ASCL) represents over 21,500 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million children and young people across primary, secondary, post-16 and specialist education. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.
2. ASCL welcomes the opportunity to contribute to this consultation. In addition to the responses below we would urge the inquiry to consider ASCL's published works on '[The Forgotten Third](#)', particularly when considering the impact of minimum entry requirements (MERs) in GCSE English and maths at grade 4+. It seems incongruous that this policy is being advocated while we have a system of comparable outcomes in England which effectively means a third of all students will *not* achieve the MERs.
3. ASCL believes that there is an over-arching issue with the definition of the problem that this consultation is trying to address. Proposals to "improve outcomes and access for students" are often at odds with proposals for "value for money of investment in higher education by students and taxpayers". Separate consultations on these two aspects of HE reform would have been more useful.
4. There is also a glaring omission in the design of the questions in that there is no mention of the Applied General Qualification, and particularly the BTEC level 3. Over a quarter of a million students take one or more BTEC qualifications every year, and many of these students go on to HE. They often have very specific support needs when attending HE, particularly in their early months, and the consultation has missed an opportunity to reflect on this.
5. One of the two main proposals which have attracted response from ASCL members is around MERs. There are only a few thousand students who attend HE who are in this category – many of these are from ethnic minority backgrounds where English is not their first language or are SEND students. This means that the 'problem' is being unhelpfully exaggerated.
6. The second of the two main proposals which have attracted response from ASCL members is around the ability to access student finance. In our view this is not the key financial issue affecting HE students; access to maintenance grants and loans is a far more pressing issue. This should have been consulted on in this consultation rather than the issue of denying access to student loans.
7. The consultation seems to assume that taking STEM subjects in HE will automatically lead to a good career, and taking non-STEM subjects will automatically lead to a poor one. This is manifestly untrue, and some of the statistics used to evidence this assertion fail to mention that many STEM degree graduates need to take a further MSC in order for students to progress to their next destination.

B. Key points in answer to questions

Question 1: What are your views of SFCs 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 in your submission.

8. As stated in paragraph 7 above, there is an assumption in this consultation that STEM subjects equal a good career and non-STEM equal a poor one. But to try to force students to choose STEM subjects in HE by the use of SNCs is crass and crude. Encouragement for STEM subjects must start with younger students – at Key Stages 3, 4 or even younger. This must be a long-term strategy not a crude quick fix.
9. In addition, SNCs are not necessarily a means to restrict provision which offers poorer outcomes, not least because students choose provision for a variety of reasons, including local accessibility. SNCs will not address this.

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.

10. SNCs, if applied, are best applied at course level because this is where the quality of provision has the most impact on student experience and outcomes.

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.

11. We do not understand how SNCs can act as an effective influence on student outcomes. It seems to ASCL that SNCs are more a mechanism for impacting on financial factors around funding rather than related to student outcomes.

Question 4: 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.

12. As set out in our answer to Questions 2 and 3 above, SNCs could have unintended consequences if they are applied at a different level other than at course level.

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.

13. No. There are many examples where students have not met the minimum eligibility requirement in maths and English but have progressed to higher education programmes and been very successful.
14. MERs could decrease access for students, decrease the flexibility of universities in making their own assessments of student competence and decrease the use of contextual information in making an offer of a place.

15. MERs may also prevent students with certain disabilities from accessing university, such as some students on the autistic spectrum who may have difficulty in achieving GCSE English (which is a fairly common experience).
16. It also seems incongruous that the new T Levels qualifications have recently been amended so that students no longer need to have achieved English and maths as an exit requirement.
17. There are many degree pathways where maths, in particular, is not a necessary requirement in order to be successful.

Question 6: Do you think that a grade 4 in English and maths GCSE (or equivalent), is the appropriate threshold to set for eligibility to student finance, to evidence the skills required for success in HE degree (L6) study? Yes or No. Please explain your answer and provide reference to any pedagogical or academic sources of evidence to explain your reasoning.

18. No. This is a proposal which is based on financial rather than educational reasoning. It also favours individuals from affluent backgrounds who can afford to pay tuition fees without needing to take out a student loan. As referenced in Questions 3 and 4, there may be many reasons why a student is unable to gain a grade higher than four in maths and English, including many students with SEND – effectively discriminating against these students by denying them the opportunity to attend higher education.

Question 7: 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 (L6) study? Yes or No. Please explain your answer and provide reference to any pedagogical or academic sources of evidence to explain your reasoning.

19. No. Again this is a proposal which is based on financial rather than educational reasoning. As in our answer to Question 6, there may be many reasons why individuals are unable to gain more than two grade Es at A level but may still be able to progress and be successful at higher education level.

Question 9: Do you agree that there should there be an exemption from MERs for part-time students? Yes or No. Please explain your answer and give evidence where possible.

20. Yes. Part-time students may not have the minimum eligibility requirements but may have the experience, knowledge and/or other types of qualifications which allow them to do well in HE.

Question 10: Do you agree that there should be an exemption to the proposed MERs for students with existing level 4 and 5 qualifications? Yes or No. Please explain your answer and give evidence where possible.

21. Yes. As in our answer to Question 9, students with existing level 4 and 5 qualifications will already have gained the experience and knowledge needed to successfully complete qualifications at level 6.

Question 11: 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? Yes or No. Please explain your answer and give evidence where possible.

22. Yes. Those with strong results at level 3 have already proved that they have met the proposed eligibility requirements needed to progress onto a level 6 programme.

Question 12: 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? Yes or No. Please explain your answer and give evidence where possible.

23. Yes. As in our answers to Questions 10 and 11, students who enter level 6 via an integrated foundation year or who hold an 'Access to HE' qualification have shown that they have met the proposed eligibility requirements.

Question 13: Are there any other exemptions to the minimum eligibility requirement that you think we should consider? Yes or No. Please explain your answer and give evidence where possible

24. Yes. Higher education providers should be allowed to make their own judgements about who meets their minimum eligibility requirements, in addition to those referenced in Questions 12 and 13. This could include those who have already achieved good level 3 grades, achieved level 4 or 5 qualifications, gained an integrated foundation year, have an 'Access to HE' qualification or who are unable, for good reasons, to gain a good pass in maths or English.

Question 14: Do you agree with reducing the fee charged for foundation years in alignment with Access to HE fees?

25. Yes. This would make it easier for adult learners and those with disadvantages to be able to afford to take a degree. But this must go hand-in-hand with better access to maintenance grants/loans. Tuition fees are less of an issue to disadvantaged students than maintenance costs and the costs of living.

Question 15: 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.

26. The opportunity would be an encouragement for more people to study at level 6. The challenge would be ensuring that those who most needed a reduced fee had access to it.

Question 16: 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?

27. We cannot see a fair case for this proposal. The courses outlined in Question 17 already attract fewer people from disadvantaged groups.

Question 17: If some foundation year provision were eligible to attract a higher fee, then should this eligibility be based on: • particular subjects, such as medicine and dentistry; or • some other basis (for example by reference to supporting disadvantaged students to access highly selective degree-level education)? Please explain your answer.

28. See our answer to Question 16.

Question 18: What are your views on how the eligibility for a national scholarship scheme should be set?

29. A national scholarship scheme may be helpful to providers in growing levels 4 and 5 provision. In particular, a national scholarship scheme might help those who wish to study or gain an apprenticeship at this level but are not sponsored by employers.

Question 19: 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.

30. There are several ways in which the government might help providers to grow levels 4 and 5 provision, including increasing grant funding and capital funding for buildings improvement and more up-to-date equipment and facilities.

Question 20: What drives price differences at level 4 and 5, where average fees in FE providers are significantly lower than in HEIs?

31. The cost of delivering a course (staffing and equipment) will drive fees within FE. There should therefore be no educational reason as to why fees at FE and university should be different between FE and HEIs. It tends to be the superior sports and other facilities, along with student and/or employer expectation, that allows for the fee differential.

Question 21: 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)?

32. The same drivers of fees exist at levels 4, 5 and 6 between universities, FE and private providers.

22: How can we best promote value for money in the level 4 and 5 market to avoid an indiscriminate rise in fees?

33. Value for money is an important part of the market for levels 4 and 5 provision, but so too are employer and student expectations. The benefits of level 4 and 5 study to employment should be publicised more, as well as opportunities for adult upskilling through the use of level 4 and 5 qualifications.

Question 23: 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 document, published alongside this policy statement and reform consultation.

34. Level 4 and 5 qualifications tend to be price-sensitive, as do 'Access to HE' courses. However, students will take into consideration other costs of study such as travel and subsistence. Understandingly it is the most disadvantaged students who tend to be most price-sensitive – often coming from a background with an aversion to any levels of debt.

Question 24: What are your views on the current barriers, including non-financial barriers, that providers face in offering and marketing level 4 and 5 courses? Where possible please include evidence in your answer. In answering this question, you may wish to consider the steps we have taken to reform HTE to date, as set out in the following section.

35. The main barriers to marketing level 4 and level 5 programmes are financial, but there are also other issues such as recruiting the right staff to teach at this level and competition with employers for staff, in particular those with a technical background. For

learners, the main barriers are the lack of realisation of the value of level 4 and 5 courses in offering better employment and career opportunities. This requires better and more lifelong learning and improved careers information, advice and guidance.

Question 25: Which of the approaches below, which could be introduced separately or together, do you prefer for delivering these aims, and why?

• **Introducing requirements for each module to be individually assessed and/or for students to complete a summative assessment at the end of a qualification.**

36. This approach is preferable if there is a national credit accumulation and transfer system.

• **Awarding bodies submit qualifications with a modular structure and the Institute carry out an assessment of the quality of individual modules to provide assurance of their value to learners and employers.**

37. No view.

• **An Institute/employer-led process to develop a common modular structure for HTQs, to support credit transfer and labour market currency of modules.**

38. No view.

Question 26: How would these approaches align or conflict with OfS and/or university course approval requirements?

39. They would align if a national credit accumulation and transfer system were to be developed.

Question 27: Are there any other approaches we should consider?

40. No view.

Question 28: How should any of these approaches be applied to qualifications already approved as HTQs?

41. There could be a period of transition of three to five years where current courses are required to move to a modular scheme linked to a national credit accumulation and transfer system.

C. Conclusion

42. We hope that this response is of value to your consultation. ASCL is willing to be further consulted and is happy to assist in any way that we can.

Kevin Gilmartin and Anne Murdoch
Association of School and College Leaders
6 May 2022