

**Question 2: To what extent do you agree with the proposal to split price group C1 in order to implement a reduction of 50 per cent to the high-cost subject funding allocated to subjects in the performing arts; creative arts; media studies and archaeology? (See paragraphs 15 to 26)**

Strongly disagree

Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.

We have two fundamental concerns about this proposal. The first relates to the notion of 'strategic priority' and the interpretation that this should apply to all STEM subjects but to none of those in the subject areas for which we have particular concern. The second relates to the methodology for assigning funding to the relevant subject areas (see answer to q'n 3).

The notion of strategic priority starts with a highly limited concept of the value that accrues from the experience of higher education. It is highly problematic to associate the value of a subject with the earnings of graduates, as it assumes that the purpose of higher education is to contribute to GDP, and provide training for employment, rather than to improve the quality of life more generally in the UK and beyond. The consultation document (paras 23 and 24) notes that "Graduates in the proposed price group C1.2 subjects also play an important role in supporting important parts of the UK employment sectors, economy and cultural life... While, therefore, we recognise the particular importance of subjects in the proposed price group C1.2 and want provision in those subject areas to continue to be widely available, we believe they are nevertheless lower priority for OfS funding than other high-cost subjects". The value of the subject areas with which we are concerned is underlined by the widespread evidence of large and rapidly increasing employment in those sectors of the economy related to media, information, journalism and digital arts etc. The sector 'contributed about £112bn to the UK economy in 2018, a 43.2% increase in real terms since 2010' (in estimates calculated by Oxford Economics, 2020).

They are also (as well explained in the consultation document) of huge and increasing social significance. The central and growing importance of communications, the online world, and media generally in the lives of UK citizens makes it unthinkable that universities would not deliver rigorous, thorough, and properly resourced teaching of high quality in these areas. The value of higher education, especially in the fields of primary concern to us, should be measured, among other things, by the extent to which it educates rational and knowledgeable citizens able to understand the means by which images, arguments, and information in popular circulation are manufactured and affected. This might be especially evident in a pandemic environment where the enormous economic, social and political

consequences of misinformation and disinformation are abundantly clear . In describing the value of these programmes, para 24 of the consultation document suggests, for these reasons, they should “continue to be widely available”. We are extremely concerned that this will not be possible if recurrent funding, as proposed, is cut by 50%.

The document also, rightly, notes (para 22) that as well as “bringing huge benefit to society and our culture”, courses in these fields “make a particularly important contribution to access and participation.” Any threat to recurrent funding would damage this role. It overlooks the role of such courses in widening participation in higher education and thereby providing access for a large number of young people to graduate jobs and earning potential. Cuts to education in these areas will not only reduce participation but will be reflected in the future diversity of the workplace (and thereafter, representation in the materials provided). For a range of industries for whom, historically speaking, diversity and representation have always been a problem, limiting the choice of providers, or the locations in which programmes in all the fields embraced by the loose term ‘media studies’, are offered, will cause considerable difficulties, exacerbating existing regional as well as social inequities. Therefore, with limited representation and diversity of content, there will be less appeal for audiences, as well as a reduction in contribution to GDP.

**Question 3: Notwithstanding your answer to question 2, if we were to split price group C1 as proposed, to what extent do you agree with our approach to implementing this? (See paragraphs 27 to 28 and Annex B)**

Strongly disagree

Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.

The split into two groups of the previous price group C1 would be, in our view, fundamentally wrong in principle. However, we also have deep reservations about the means by which it would be calibrated if it is adopted. As Appendix B makes clear the elastic rubric of ‘media studies’ embraces no fewer than 4 CAH categories and 6 LDCS categories. The many programmes within these categories vary enormously in the extent to which they provide vocational and focused professional training, and to which they are rooted in social science, humanities, or technological forms and bases of teaching. They vary, too, in the extent to which they provide, and maintain, high-cost resourcing (for example of equipment, studio facilities and so on) in order to ensure the highest possible quality of analytical and practical teaching. For all these reasons, we see the proposed split of the price group as based on superficial labelling rather than serious consideration of actual and necessary provision. While we disagree with the underlying argument for creating the split at all, we also suggest the proposed methodology for implementing such a split is woefully inadequate and ill-informed. We note this is, in effect, acknowledged by the consultation document in conceding that “we will need to make assumptions about the proportion of price group C1 students attributable to the subjects that make up the new price groups C1.1 and C1.2.”. Our view is that such assumptions should be informed by comprehensive evidence, not politically driven presumptions. This requires detailed

examination, programme by programme, of the necessary costs of providing high quality teaching, rather than a blanket application of arbitrary and damaging reductions in funding for a diversity of programmes with similar labels.

**Question 13: Do you have any comments about any unintended consequences of these proposals, for example, for particular types of provider or for particular types of student?**

We believe the proposed cuts to funding in the fields of concern to us will have a major and damaging effect on the international reputation of these fields. Cultural, communications, and media studies in the UK, in their various guises, are internationally of very high repute, as evidenced by citation data, and by such exercises as the Research Excellence Framework. The UK is widely regarded as a major locus of expertise and innovation in these fields, and as a consequence is highly attractive to overseas students and research funders. A good deal of 'soft power' is generated by the prominence of UK work in these fields in the international arena. This would all be put at great risk by any cut to their financial underpinning.

The proposal to cut funding by 50% in some areas will primarily affect 'pre-92', non-Russell Group and newer universities. The proposal also represents a particular risk to local/specialist providers - especially those operating within the tertiary/FE sector to provide affordable Higher Education, or access to HE provision in these fields. It further threatens to remove support for community providers who form the backbone of the UK's pledge to widen participation. The Further Education sector has suffered year-on-year cuts of 25% or more as it currently stands.

For many learners with protected characteristics, reducing the choice of providers (to those within the City, or those with greater levels of income), limits their choice of institutions, and conceivably excludes those suffering from with anxiety, depression, or specific learning needs, in cases where studying away from home is simply not an option. The same can be said for those living within economically deprived areas who may have complex personal issues including childcare and a lack of access to basic information technology in the home. If the courses cease to be financially supported, they will not be viable to run.

It is also clear that any reduction of provision in these fields, as noted above, would have a disproportionate effect on students with disabilities, and on those from less privileged backgrounds. Data is incomplete but the distribution of these fields across HE institutions also strongly suggests a disproportionate and deleterious effect on the participation of students from ethnic minorities.

**Question 16: Do you have any other comments on the proposals in this document?**

We note that the letter of guidance received by ofstud from the Secretary of State is one of many things it should "have regard to" in making these decisions. The vague and misguided notion of 'strategic priorities' therefore should not, and we trust will not, determine the more nuanced and educationally sound proposals that we hope will emerge from this consultation.