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Dear Minister,

CCUE Response to Higher Education White Paper

I write on behalf of the Council for College and University English in response to your call for consultation on the recent White Paper, 'Higher Education: Students at the Heart of the System'. Whilst we accept that the new funding regime is now in place and will not be changed in the short term, some of the White Paper's suggestions for the next round of changes to the Higher Education sector are clearly still under negotiation and it is to these that we will pay most attention.

We would, however, begin by rejecting the implication of the White Paper's title, namely, that students are *not currently* at the heart of the HE system. The most recent NSS records overall satisfaction levels with HE running at over 80%, with fewer than 10% of students expressing any dissatisfaction with their provision. This is testimony to the close relationship between students and their teachers on campus, to the success of measures in which we already invest in order to improve students' experience, and to the extent to which teaching retains its importance within the sector, despite ever-increasing demands on staff time. The implicitly critical tone of the title is maintained throughout a Paper which is based on the supposition, but not on any hard evidence, that the HE sector is in need of a radical overhaul. In fact, research and teaching within this sector are constantly monitored and carefully evaluated, by peers, by students, and by government. The sector is also immensely attractive to, and cost-effective for, overseas students, who see British universities as world-leading. In the rest of this letter we will highlight those projected developments which, in our view, risk jeopardising rather than enhancing the excellence of Higher Education in England.

HE in England is a globally-recognised and highly successful part of the British financial and cultural economy, and we need to protect its status against the White Paper proposals that could harm it. We would draw your attention to the following issues in particular:

- the 'market' that will open up due to de-regulation will necessarily undermine some existing institutions' stability and hence the confidence of students in applying to them. This will impact badly on mid- and long-term planning and the quality of provision for students. We would ask how new HE providers will be regulated? How will their quality be safeguarded? Is it envisaged that existing universities will be involved in this process?;
- these plans to broaden the range of providers of HE will necessarily weaken the relationship between research and teaching at University level which is so crucial to the maintenance of excellent teaching, as new providers will not be able to replicate the research facilities, resources, and research experience of traditional providers. There will then at best be a two-tier provision of HE possibly divided by price and students' abilities to afford higher fees;

- the increased emphasis on student satisfaction in a market situation may fail adequately to recognise the criteria of an academically demanding degree course, and thus fail subsequently to stimulate the next generation of creative thinkers, academic researchers and innovators;
- the decrease in student mobility, and hence the availability of excellent students, may, despite the government's alleged intentions, result from the increase in the fees to be paid by students. We would ask whether adding an additional level of bureaucracy in OFFA, and increasing its resources four-fold, is really the best way to achieve increased student mobility? The current lack of students from disadvantaged backgrounds at selective universities needs to be addressed within a wider set of social and political factors. This has to be recognised within the broader education system as a whole, and not simply laid at the door of HE providers;
- changes to the admissions system need to be carefully thought through, modelled and trialled in order to minimise disruption to both students and universities;
- we fear that the increasingly significant dismantling of a UK-wide Higher Education system will impact on international perceptions of the sector as well as colleagues' mobility within UK universities; and
- more specifically in terms of English within Higher Education, visa changes, which are having a major impact on both UG and PG overseas recruitment, are much more acute in their effect (in terms of numbers recruited rather than income of any University) for Arts and Humanities subjects.

In general, the proposed changes do not present a compelling vision of an incentivised, competitive HE sector, and we remain to be convinced that these changes and the new funding regime will actually 'help address the large Budget deficit' that the country faces. We will not even see a properly free market, but rather one beset by distortions, unevenness and instability. In addition, increasing HE provision by FE sector, or by private Colleges (both at the lower ends of the fees ladder) risks distorting the market, rather than complementing provision in Universities, as with current franchise and Access arrangements.

The White Paper does not address postgraduate study and research, proposals on funding for which we believe to be imminent. We would enjoin you as Minister for Universities to bear in mind the great significance of maintaining a thriving postgraduate community within Universities. This is crucial for the future supply of top-quality scholars in the profession, and ultimately for the country. A properly funded postgraduate sector, accessible to everyone with appropriate qualifications, is essential in order for the country to meet the social, economic, and cultural challenges of the future.

Yours faithfully,

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