

Creative UK Response to DfE's 'Higher Education policy statement and reform consultation' 6th May 2022

About Creative UK

Creative UK supports, invests in, connects, and champions the Creative Industries and their ability to catalyse social and economic change. We fuel creativity by investing in people and businesses, empowering innovators and entrepreneurs by connecting them with each other, and with finance, business development, and skills training, to enable them to reach their full potential – without compromising their ideas. wearecreative.uk

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1. 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? 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 below.

While Creative UK supports government's intention to address poor quality provision at HE level, we do not agree that Student Number Controls ('SNCs') are an appropriate intervention to achieve this.

We support the notion that participation in HE should lead to positive graduate outcomes for 'students, society and the economy'. We welcome Government's acknowledgment in the consultation document that positive graduate outcomes should not be based solely on graduate earnings, but rather a combination of factors that take into account societal benefit, skills shortages, and work with a 'forward focus'. These broader definitions and metrics for quality have been something we have long been calling for through prior OfS consultation responses and in our dialogue with Government.

Prior to the pandemic, the creative industries were growing at four times the rate of the UK economy as a whole and experienced strong growth in all parts of the country. They created jobs at three times the rate of the UK average, employing 2 million people across all nations and regions, and contributed £116bn in GVA in 2019 – a greater GVA contribution than the aerospace, automotive, life sciences and oil and gas sectors combined. The sector was incredibly hard hit by the global pandemic, however despite this, recent modelling shows that, with the right investment, the sector can create 300,000 new jobs and £132bn in GVA by 2025.

We are therefore encouraged to see the creative industries recognised as a subject of strategic importance within the consultation document, in line with government's own *Plan for Growth*.

Several of our creative sectors are primed to continue to grow; IT, software, computer services and video games are projected to create over 146,000 new jobs by 2025.¹ 68 per cent of respondents to TIGA's (The Independent Game Developers' Association) recent Business Opinion Survey planned to

¹ UKCI report, 2021, Creative UK

increase employment over the next year²; it is clear that we will continue to need highly qualified creative graduates for the foreseeable future, not less.

However, to deliver on the potential for the creative industries, we must ensure that the talent pipeline is strong, diverse, and ready to meet future skills needs. The UK's world-leading higher education providers and the diverse range of courses they deliver are a crucial part of securing this strong pipeline of workers with creative skills, both within and beyond the creative industries. In fact, 71% of the UK's creative workforce holds a qualification to degree level or higher compared with 44% for the whole economy.³ A strong diverse talent pipeline will be essential to the sector's ability to build back better post-pandemic and play a leading role as the UK seeks rapid and equitable growth.

We do welcome the opportunity these reforms present within the wider skills context, in potentially opening new routes into our industries by strengthening Further Education pathways and removing the financial barriers to further studies, and the LLE proposals. However, it is crucial that students themselves remain at the heart of this, and all opportunities for further and higher education are equal and available to all, in the most transparent and informed way as is feasible. Introducing reforms that jeopardise this is potentially damaging to our creative talent pipeline.

We believe that the introduction of SNCs, particularly at sector level, would result in these unintended damaging consequences. SNCs could limit the crucial creative talent pool when demand itself is rising. Particularly in considering how Government intends to assess quality graduate outcomes in line with the regulator. For example, given OFS current methodology for determining course quality hinges on graduate earnings 15 months post degree completion. Within the consultation document itself, government acknowledges that individuals do not realise their earning potential until in their 50s. The existing metrics do not capture the full picture of career progression in future-facing industries, such as the creative workforce, meaning that high quality courses *could be* inadvertently penalised. Whilst we understand the majority of HE providers perform well in the aforementioned metrics in their creative degree provision, it would still be unnecessarily risky and regressive to impose sweeping controls as suggested.

We are also concerned that the imposition of SNCs would encourage providers to become more risk-averse in their course offering, resulting in an innovation freeze at HE level with alarming knock-on consequences. To push the boundaries of future economic potential there is a need for innovative course provision. For example, future facing undergraduate courses combining STEM and creative skills together^{4 5 6}

The demand for creative skills is already high. Creative roles make up a significant proportion of government's Shortage Occupation List, as recognised in this consultation, and include many of the jobs cited as being very likely to grow as a share of the workforce by 2030.⁷ These shortages are also expected to increase given the impacts of Brexit.⁸ The demand for creative skills is set to grow. Creativity is as important across other industries as it is across the arts. In a study across 35 million

² TIGA, TIGA Research Shows UK Video Games Industry on Track for Growth In 2022, January 2022

³ <https://www.pec.ac.uk/discussion-papers/creative-skills-monitor>

⁴ <https://www.kent.ac.uk/courses/undergraduate/4410/digital-design>

⁵ <https://www.falmouth.ac.uk/study/undergraduate/computing-for-games>

⁶ <https://www.gold.ac.uk/ug/bmus-bsc-electronic-music-computing/>

⁷ [Creative Industries Policy & Evidence Centre \(pec.ac.uk\)](https://www.pec.ac.uk/creative-industries-policy-evidence-centre)

⁸ [Creative Industries Policy & Evidence Centre \(pec.ac.uk\)](https://www.pec.ac.uk/creative-industries-policy-evidence-centre)

UK job adverts over a four-year period, research by the PEC found that creative skills are a key requirement in jobs that are particularly likely to grow in importance in the future workforce.⁹ There is a substantial amount of research to corroborate this, including the Kingston University Future Skills League Table 2021, which cites creativity as one of the top 10 future skills as chosen by business (cross sector.)¹⁰ It is therefore vital that interventions which prevent students from studying courses of their choice, could inadvertently disincentivise innovation and/or stunt the talent pool of future-facing industries are not introduced.

Regarding alternative interventions to ‘restrict the supply of provision which offers poorer outcomes.’ This is of course the right thing to address, for the taxpayer, for society, for the broader economy, the UK’s soft power and for the student themselves. But regulating this provision needs to be nuanced and with more distinct definitions of ‘quality’ and ‘good, graduate outcomes’ based on subject area and the industries they are designed to feed qualified talent, including entrepreneurs, into. Where this is clear, providers should be responsible for delivering this, and held to account by the regulator accordingly. Universities UK’s recent ‘Framework for programme reviews: ensuring the value of courses’¹¹ is an excellent framework of how this nuance can potentially start to be applied.

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?

No.

While we understand that the logic underpinning the proposed MERs is not to deter students from Level 6 study, we are extremely concerned that the intervention would significantly disadvantage some students that can succeed on these courses. HE is a critical tool to bridge gaps and are fundamental to levelling up the UK. For example, those from lower socio-economic backgrounds are statistically less likely to do well at GCSE and A-level, however this is not necessarily indicative of the individual’s future potential. The MERs could therefore exacerbate existing inequalities, including regions where social mobility is already limited such as in the North East of England. However, the attainment gap at GCSE level does not automatically constitute less success at HE level, with 73% of students from the poorest areas achieving a first or 2:1 degree certification.¹²

There is a risk that introducing MER’s may inadvertently benefit those who have already been most advantaged through family background or prior schooling; and sending a message that those from less advantaged backgrounds should be directed to less prestigious qualifications.

We are concerned about the unintended impact the MERs could have on students who are often successful in creative HE and careers, such as neurodiverse individuals, and are surprised to not see more consideration of these students in the exemptions laid out later in the consultation.

Furthermore, The UK Creative Industries are missing more than 250,000 working class voices: a deficit almost equal to the increase in jobs in the sector over the past five years¹³ And while it is right and crucial for industry itself to address this urgently, it cannot be the case that introducing

⁹ [Creative Industries Policy & Evidence Centre \(pec.ac.uk\)](https://pec.ac.uk)

¹⁰ <https://d68b3152cf5d08c2f050-97c828cc9502c69ac5af7576c62d48d6.ssl.cf3.rackcdn.com/documents/user-upload/kingston-university-0b628deedf7-future-skills-2021.pdf>

¹¹ <https://www.universitiesuk.ac.uk/what-we-do/policy-and-research/publications/framework-programme-reviews-ensuring>

¹² [Denying loans to students with weaker A-levels will ‘penalise poor families’ | Education | The Guardian](#)

¹³ Social Mobility in the Creative Economy, PEC, 2021

minimum eligibility requirements may potentially compound this issue further, particularly as our industry is committed to driving government's levelling-up agenda.

We strongly believe that, where entry criteria are fundamental to a student's ability to do well at Level 6 study, they are already enforced by individual providers at a course level. A top-down, one-size-fits-all approach does not account for the differing skills requirements and profiles of successful students. For example, many architecture courses impose strict entry requirements for attainment levels in Maths and Art. Equally, our world-renowned conservatoires based across the UK have rigorous audition processes for students which take precedence over academic qualifications on paper, as you would expect for the professions these students aspire to enter. The audition processes are based not just on ability but on the potential to succeed and progress to viable careers. Our world class conservatoires do not wish to reject students who could excel through the audition process due to exam results. Moreover, many potential students have already prioritised their instruments at an early age, which can be reflected in their exam history.

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?

No.

Whilst we recognise the importance of numeracy and literacy, attainment of these grades is not a pre-requisite for a successful creative career off the back of further and higher education. Where maths and English is important in pursuing any specific course of study successfully and to completion, providers should already have established eligibility requirements in place, as has been mentioned.

Level 2 English and maths do not provide a comprehensive enough indicator of academic ability that would be required for this proposal to go ahead. Research has shown that GCSE "low attainers" missing either English or maths typically had an average of eight GCSE passes overall, just one fewer than the non-low attainer average.¹⁴

There are creative subject areas that would (and do) look for students with more relevant foundational knowledge and qualifications in Art, Design, Music etc. Although this is made increasingly challenging given the current decline of creative and arts subjects at GCSE and A-Level; take up of arts subjects is in significant decline with 37% fewer entries for arts-based GCSE entries in 2020 compared to 2010 (Ofqual 2020). Other indicators of this decline since the EBacc (which does not include any arts-based subjects) was introduced in 2010 are evident in the number of teachers for drama and music, which has dropped by 420 whilst the number of teachers for subjects included in the EBacc has increased by 4,561. Correspondingly, there is a drop in the number of teaching hours devoted to arts vs EBacc with arts-based subjects seeing a decline of 7,181 teaching hours in a school year versus an increase of 89,728 hours for EBacc subjects (DfE 2016).¹⁵

Although that is not in the scope of this consultation, our point that focusing solely on maths and English from the breadth of qualifications, as a pre-requisite for success in higher education, and

¹⁴ https://www.nuffieldfoundation.org/wp-content/uploads/2021/02/Post16-transitions-for-lower-attainers_summary.pdf

¹⁵ Creativity and the curriculum: educational apartheid in 21st Century England, a European outlier? Ashton & Ashton, 2022

ultimately a creative course and then career, will merely represent another potentially unnecessary barrier for creative talent and potential to be realised.

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?

No.

Whilst we can understand the rationale in this proposal, we still believe it is too constricting. We would also point out that there is a wide range of Level 3 options available, particularly in creative, vocational qualifications. There is an implication with a focus on A–Levels that there is one ideal, academic route into higher education; a myth we should be challenging to achieve levelling up.