

# UNIVERSITIES UK RESPONSE TO THE REVIEW OF POST-18 EDUCATION AND FUNDING CALL FOR EVIDENCE

## THE IMPORTANCE OF THE POST-18 EDUCATION SYSTEM

The post-18 education system in England transforms the lives of all those living in the UK. It is integral to the UK's creativity, cultural heritage and civil society. It creates the knowledge and skills that individuals will use over their lifetimes both at work and outside of work. It affects the earning power of individuals and how prosperity is shared across the localities and regional economies of the UK. It drives innovation and economic growth, is key to sustaining the UK's ability to compete globally, and underpins policy-making and the delivery of public services.<sup>1</sup>

The post-18 education system in England must:

1. Support productivity growth by providing a sufficient supply of higher-level skills to meet employer demand. Employers enhance their competitiveness through their highly skilled employees, who need both academic and technical knowledge.<sup>2</sup>
2. Improve social mobility by supporting learners from all backgrounds to reach their maximum potential across their lifetimes. All individuals must be able to access the learning that best supports their needs and progress to higher levels should they have the ability and desire to.<sup>3</sup>
3. Allow the UK to respond to future unanticipated challenges (technological, political) by providing a skills base with sufficient breadth and depth. A dynamic and diverse skills base with subject coverage across science, technology, engineering and mathematics (STEM) and the arts, humanities and social sciences is needed. Individuals must also apply their knowledge with maximum effect through their critical thinking, problem solving and leadership skills.<sup>4</sup>
4. Work in tandem with equivalent education systems in Scotland, Wales and Northern Ireland. Although higher education is substantially devolved to the Scottish Government, and the Welsh and Northern Irish Assemblies, policy and funding changes to higher education in one nation have both direct and

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<sup>1</sup> Universities UK (2017) *The economic impact of universities in 2014–15*. The report shows that UK universities and their students contributed £52.9 billion gross value added to the UK's economy, and supported nearly 950,000 jobs.

<sup>2</sup> Department for Business, Innovation and Skills (2015) *UK skills and productivity in an international context*

<sup>3</sup> The Robbins report (1963) Higher Education Report of the Committee appointed by the Prime Minister under the Chairmanship of Lord Robbins

<sup>4</sup> See skills section in Universities UK (2017) *Response to 'Building our industrial strategy: green paper'*

indirect consequences for the rest of the UK. This is particularly the case for changes to the English system, given its scale relative to its neighbours.

The current post-18 system makes a significant contribution to these main goals.

*The post-18 system has been very successful in growing the supply of higher level skills*

Between 2009–10 and 2016–17 the number of higher education qualifications awarded each year increased by 6%, or 43,000. Around 41% of courses in higher education develop specific, technical skills in preparation for a particular profession.<sup>5</sup> The vast majority of employers report high levels of satisfaction with graduate skills and find graduates well prepared for work.<sup>6</sup> Many employers collaborate with higher education providers, including in the delivery of higher-level and degree apprenticeships, sandwich degrees, the co-design of collaborative programmes, and meeting local skills requirements.<sup>7</sup>

The UK's success in the growth of higher-level skills can be attributed to sustained and stable funding. The government's long-term commitment to investment in human capital is a significant strength of the current system. The funding system in England has allowed the cap on undergraduate numbers in to be lifted since 2015–16 and growth to meet future employer needs. Student mobility around the UK is high – just under 50,000 students from England choose to study their undergraduate higher education in Wales, Scotland and Northern Ireland each year, and over 38,000 students from the devolved nations study in England.<sup>8</sup> Therefore the English funding system is closely interconnected with funding systems in the devolved nations.

While the growth in higher-level skills has been strong, there is a current shortage which is projected to continue. The demand from employers for higher-level skills will continue to increase, and 61% of employers are not confident about accessing highly-skilled employees in the future.<sup>9</sup>

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<sup>5</sup> Including careers in medicine, dentistry, law, engineering, IT and teaching.

<sup>6</sup> Additional details and references for growth in higher education qualifications, the technical element and employer satisfaction are contained in a forthcoming Universities UK publication on the supply and demand for higher-level skills.

<sup>7</sup> Just under 100 universities are now on the register of apprenticeship providers. For examples of employer collaborations please see Universities UK (2017) *Response to 'Building our industrial strategy: green paper'* [Annexe 2.B](#).

<sup>8</sup> Higher Education Statistics Agency student record, 2016-17. Further details are given in the letter to the Chair of the Panel from Universities Scotland, Universities Wales, Queens University Belfast and Ulster University.

<sup>9</sup> Additional details and references for the shortage of higher-level skills and employer views are contained in a forthcoming Universities UK publication on the supply and demand for higher-level skills.

### *The post-18 system has improved social mobility among young people*

The current system in England has been very successful in supporting growth in the number of talented young people from disadvantaged backgrounds entering full-time university study, with disadvantaged 18-year-olds 82% more likely to enter university in 2017 than in 2006.<sup>10</sup> The 2012 reforms to student funding, including an increase in fees, have not deterred young people from pursuing full-time study.

A very diverse range of institutions provide higher education, giving learners from different backgrounds a wide range of choices on how and where they study. Higher education institutions partner with further education colleges and schools, and have collaborative delivery models with employers (for example on degree apprenticeships). This helps learners choose the pathway that best suits their needs, and to progress to higher levels of study should they wish to.<sup>11</sup>

The success of the post-18 system in supporting social mobility can be attributed to the features of the student funding system – including how the system does not restrict undergraduate numbers in England, the structure of loans, and the requirement for access agreements.<sup>12</sup> The removal of the cap on student numbers in 2015–16 (and partial relaxation from 2012–13 onwards) has helped more qualified people enter higher education. The income-contingent loan system is highly progressive, with no upfront payments, and the total amount repaid is based on a graduate's ability to pay over their working lives. The current system captures the beneficial aspects of a graduate tax, with an additional benefit of the loan being forgiven after the maximum period.

The requirement for higher education providers who charge more than a basic level of fee to have an access agreement has led to sustained investment in measures to widen access and participation and to ensure that students succeed in their studies. Providers spent £725 million in 2015–16 (up from £564 million in 2012–13), representing 27% of income from fees above the basic level. This comprised £120 million on outreach (including working with schools and pupils), £448 million on financial support for underrepresented groups, £117 million on measures supporting students to complete their course successfully, and £41 million on progression activities to support disadvantaged students.<sup>13</sup>

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<sup>10</sup> UCAS (2017) *End of cycle report 2017: Patterns by applicant characteristics*. The 82% increase relates to 18-year-olds from the most disadvantaged backgrounds.

<sup>11</sup> Universities UK will be publishing a report in 2018 on how higher education institutions and further education colleges collaborate to provide pathways to higher-level skills. See footnote 7 for evidence of collaborations with employers.

<sup>12</sup> From 2019–20, Access Agreements will be superseded by Access and Participation Plans, which the Office for Students will need to approve if an institution wants to charge fees above the basic level.

<sup>13</sup> Office for Fair Access (2017) *Fair access to higher education in England: key facts*

While the post-18 system has made substantial progress, disparities remain between how likely a young person from a disadvantaged background is to go to university and their likelihood of dropping out, compared with their more advantaged peers.<sup>14</sup> There is also significant evidence that the post-18 system is not supporting the full diversity of learners from all backgrounds to reach their maximum potential across their lifetimes.

### *The post-18 system prepares the UK well to respond to future challenges*

Global technological and political changes (such as Brexit) cannot always be anticipated. The supply of skills cannot change as quickly as the needs of employers – learners need time to respond to changes in employer demands and time to study. Therefore, the UK needs a broad skills base that is flexible enough to meet unpredictable challenges.

The current post-18 system has been successful in supporting a wide range of subject provision in the UK, with 46% in STEM and 54% in the arts, humanities and social sciences. Although since the 2012 reforms there has been 6% growth in STEM subjects in universities,<sup>15</sup> there is a need for future growth across all subjects. The combination of STEM with creative skills is necessary for productivity growth, and the contribution of the arts, humanities and social sciences is crucial to understanding human behaviour, the design of effective public policies, and the UK's global position in the cultural and creative sectors. The UK's world-class creative industries are growing at twice the rate of the economy as a whole.<sup>16</sup> Languages are also of strategic importance to the UK, providing the communication skills required to enable UK businesses to participate in the global market, as well as diplomacy and trade.<sup>17</sup>

Skills beyond subject knowledge are also important. Critical thinking and practical problem solving (such as those skills acquired through research-led learning), communication, enterprise, management and leadership skills are all necessary for employers to be as competitive as possible.<sup>18</sup> While there are examples of many excellent partnerships between universities and employers, there is scope for even greater collaboration.

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<sup>14</sup> See UCAS (2017) *End of cycle report 2017: Patterns by applicant characteristics* and HESA (2018) *Non-continuation: UK Performance Indicators 2016–17*, Table T3

<sup>15</sup> Universities UK (Forthcoming) *Supply and demand for higher-level skills*

<sup>16</sup> Department for Business, Energy and Industrial Strategy (2017) *Industrial strategy: building a Britain fit for the future*

<sup>17</sup> British Academy (2017) *The Right Skills: Celebrating Skills in the Arts, Humanities and Social Sciences*

<sup>18</sup> Bloom et al (2017) 'What drives differences in management?' NBER working paper No. 23300

## HOW COULD THE POST-18 SYSTEM BE IMPROVED?

Universities UK believes that the student funding system in England should achieve five key aims:

1. All those who are qualified and wish to enter higher education should be able to do so (there should not be a cap on student numbers).
2. The system should be as fair, accessible and progressive as possible.
3. Sufficient support should be provided to cover both living and tuition costs.
4. The system should be easy to understand and transparent.
5. The system should be stable and sustainable, with the costs shared between taxpayers and graduates.

While the current post-18 system has many strengths, it is not delivering to its maximum potential:

- It needs to ensure it is meeting the needs of all learners – across diverse backgrounds and across their lifetimes. Potential demand from students is not being met, preventing further progress on social mobility.
- It must deliver greater numbers of higher-level skills to meet the needs of employers, both now and in the future. However, there is a lack of confidence in the value for money of the higher education system. This stems from financial concerns of students and graduates, uncertainty on the costs and benefits of higher education, and a need for greater transparency on how the higher education market works.<sup>19</sup> A lack of confidence may lead to future skills shortages and hold back the UK's productivity.

### Greater support should be given to support individuals studying flexibly over their lifetimes

There are two groups of individuals who are missing out on learning opportunities:

- Those who wish to study more flexibly, and for whom full-time study is not the preferred option. For example, mature learners seeking to study later in life or retrain, or young learners who prefer to earn while they study.
- Those who wish to study pre-degree qualifications and progress on to higher levels in the future.

Over the past five years, many higher education providers have made changes to meet the demand from employers and learners, including developing higher and degree apprenticeship provision with employers, increasing the number of online programmes, and developing shorter programmes (such as two-year degrees). At the same time, the average age of undergraduate students across the UK has decreased

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<sup>19</sup> Department for Education (2018) *Influence of finance on higher education decision-making*

by four years between 2007–08 and 2016–17, with the number of mature learners falling by 21% over the same period. This is related to the fall in part-time undergraduate study in England, where entrants have decreased by 59% since 2011–12, compared to a 19% fall in Scotland and a 30% fall in Wales.<sup>20</sup>

The government has focussed on more intensive provision as a solution (such as two-year degrees), but this may actually be the opposite of what flexible learners need: those wishing to retrain after a period out of the workforce, and those wishing to balance study with work, may need additional time and support to best fulfil their learning potential, and have different needs to those who study full-time.

Some learners may wish to study pre-degree qualifications, progressing to higher levels in future. There is a broad area of crossover between academic and technical education – this must work better for learners, who may not be aware of all the available options. Greater support from the funding system is needed for more streamlined pathways into higher-level skills, and more long-lasting collaborations between higher and further education.

Universities UK is undertaking a project in partnership with the Confederation of British Industry (CBI) on the economic case for flexible learning, covering all forms of provision outside of the three-year full-time degree from level 4 up to postgraduate taught. Recommendations will be made in summer 2018 to enhance flexible learning opportunities, and we will feed this into the panel’s work.<sup>21</sup>

### *The financial concerns of students while studying need alleviating*

While the costs of higher education have not deterred young people from entering higher education, students are significantly concerned about meeting their living costs while studying.<sup>22</sup> Recent survey results show that prospective students and non-students rated living costs as more of a concern than tuition costs.<sup>23</sup>

The government’s switch from maintenance grants to loans had a more significant impact on students from disadvantaged backgrounds, who need to take out higher

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<sup>20</sup> The number of part-time students in Wales did not decline at the same rate as in England. Provision of moderated fees have meant that part-time study is not dis-incentivised by prohibitive fee costs.

<sup>21</sup> We envisage that the project will cover questions in the call for evidence on how people make choices on what to study (Q2 and 3), including further study, the diversity of provision (Q4), barriers to further diversity (Q6) and how can the government encourage more flexible provision and reduce barriers (Q7 and 8).

<sup>22</sup> Student Funding Panel (2015) *An analysis of the design, impact and options for reform of the student fees and loans system in England* and Independent review panel (2017) *Review of higher education funding and student finance arrangements in Wales*

<sup>23</sup> Universities UK and the National Education Opportunities Network (NEON) (Forthcoming) *Financial concerns of students*

loans to cover living costs, resulting in higher lifetime loan repayments.<sup>24</sup> This financial barrier compounds the academic barriers that already exist for disadvantaged pupils from early years education onwards; on average, school pupils from disadvantaged backgrounds achieve lower levels of attainment than their more affluent peers.<sup>25</sup>

Higher education institutions provide direct financial support to students but since 2014–15, there has been a trend for this support to be retargeted towards initiatives to achieve greater impact in widening access and supporting retention and course choice.<sup>26</sup> Greater government support, rather than support that varies by institution, would help to alleviate student concerns and prevent distortionary effects on student choice.

**Universities UK recommends reinstating government maintenance grants, funded by new money, targeted to those students who need them the most.** This has already been achieved in Wales, where a new package of student support has been implemented, following the recommendations of the Diamond review.<sup>27</sup>

#### *Fears of debt after graduation need addressing*

Although the income-contingent loan system operates much the same as a time-limited graduate tax –with payments collected through the tax system – student loans are widely regarded as the same as conventional debt. Recent survey results<sup>28</sup> show that:

- three quarters of undergraduate students and over 70% of prospective students are worried about the total amount of debt arising from student loans
- 78% of undergraduate students and 69% of prospective students are concerned about taking out a mortgage or a business loan on top of their student loan

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<sup>24</sup> Institute for Fiscal Studies (2017) *Options for reducing the interest rate on student loans and reintroducing maintenance grants*

<sup>25</sup> In 2016, the attainment gap by the end of secondary school between disadvantaged pupils and their peers was 19.3 months nationally, ranging from 29 months in the Isle of Wight, but no identifiable gap in Newham (see Education Policy Institute (2017) *Closing the gap? Trends in educational attainment and disadvantage*). In addition, information, advice and guidance available in state schools is often patchy, which can reinforce disadvantage.

<sup>26</sup> See for example, OFFA and HEFCE (2014) *National strategy for access and student success in higher education*

<sup>27</sup> The Diamond Review received wide support from the sector and students as well as cross-party support. The new package provides targeted support to students in the form of maintenance grants and loans with a £1,000 annual non-means-tested maintenance grant for all students, and income-related maintenance grant to cover full living costs of students from the lowest income households, with a top rate of £8,100, and a loan for those not eligible for the maximum grant.

<sup>28</sup> Universities UK and NEON (Forthcoming) *Financial concerns of students*

Evidence from the Diamond review in Wales found that the ‘fear of debt’ is a key element influencing the decision to study and there is a disproportionate effect on those from lower-income families or areas.

These significant levels of concern indicate that taking out a loan may affect the future financial decisions and life choices of graduates. The government should make a much stronger distinction between student loans and conventional debt to the wider public – in terms of it being a time-limited forgivable debt, graduates only paying what they can afford (like a tax), and the remaining balance of repayments not impacting on lenders’ decisions in the future. This distinction could be furthered by removing the need for interest payments.

**Universities UK recommends that the government should not apply interest to a student loan during the course of study – and consider further options on the interest rate.** The government should also examine whether it is possible, working in partnership with the sector, to provide **more targeted financial advice to prospective students, undergraduate students and graduates** on the implications of taking out an income-contingent loan.

*There is a lack of clarity on the costs and benefits of higher education*

A student or graduate’s perception of the value for money of higher education will depend on their prior expectations of the costs and benefits of higher education, as well as their experiences during and after studying.

Recent survey<sup>29</sup> results showed:

- a majority of prospective and undergraduate students (54%) agree that students should make some contribution to the cost of their education<sup>30</sup>
- general agreement that going to university would help a graduate to earn more money in the longer term (64% of prospective students and 77% of undergraduate students agreed)
- significant proportions of students feel they have insufficient information:
  - o on the full long-term financial benefits to them of studying at university (19% of prospective and 22% of undergraduate students)
  - o on which courses and universities offered good value for money (24% of prospective and 35% of undergraduate students)

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<sup>29</sup> Universities UK and NEON (Forthcoming) *Financial concerns of students*

<sup>30</sup> 54% of individuals with no experience of higher education or intention to apply also agreed that students should make some contribution to the cost of their education.

- on the full long-term cost to them of studying at university (22% of prospective and 30% of undergraduate students)<sup>31</sup>

While students understand the general long-term financial benefit of entering higher education, they are much less certain on how this translates into benefits that relate to them personally, and how benefits vary according to choices they make.<sup>32</sup> Students also did not feel prepared for the realities of the costs of studying at university. Current information on benefits and costs of higher education needs to be better tailored to individual needs – and should include information on the wider impacts on wellbeing, as well as the financial benefits.<sup>33</sup>

Universities UK recommends that **the government should** examine whether it is possible, working in partnership with the sector, to **provide clear and tailored information to prospective students on the costs and benefits of higher education**, to ensure they are fully informed of the implications of deciding whether or not to enter higher education. Information should be personalised and tailored according to the intended course of study, as well as the location of study.<sup>34</sup>

*Greater transparency on how higher education providers compete and cover their costs is needed*

The lack of differentiation in undergraduate fee level by institution and by course type has led to problems in how the market in higher education is perceived:

- students and graduates question why all courses are charged the same, when costs of provision vary<sup>35</sup>
- questions have been raised over whether the higher education market is as competitive, dynamic and efficient as it could be<sup>36</sup>

While some progress has been made by universities and the sector to explain how universities fund their course costs,<sup>37</sup> there is a need for greater transparency and information to be made available on the following questions:

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<sup>31</sup> This is similar to the recent finding by the Office for Students in their survey of students in England, where 24% of respondents said they were not informed or prepared for how much everything would cost as a student.

<sup>32</sup> This finding is consistent with recent research by the Office for Students which shows that as students get closer to joining the workplace, they become less confident about repaying their tuition fee and maintenance loans (49% of school students and 37% of higher education students think that they will repay their loan, compared to only 27% of recent graduates).

<sup>33</sup> As evidenced in Department for Business, Innovation and Skills (2013) *Wider benefits of higher education: literature review*

<sup>34</sup> Recent polling by Universities UK indicates that student forums, university open days and university websites were three of the most popular information sources used by prospective students. These sources could be improved and added to.

<sup>35</sup> Universities UK and NEON (Forthcoming) *Financial concerns of students*

<sup>36</sup> National Audit Office (2017) *The higher education market*

<sup>37</sup> Universities UK published *University funding explained* and *University spending explained* in 2016, and individual institutions have been increasingly including information on their websites to explain how fee income is spent to students.

- How do universities make their pricing decisions on undergraduate courses and fund the student experience?
- How do universities compete with each other?

*There is little variation in undergraduate fee levels as universities price to cover losses incurred in some subjects*

The average costs of providing undergraduate courses vary from £7,500 (humanities and social studies) up to £22,000 (veterinary science).<sup>38</sup> There are also additional costs in providing a world-renowned student experience and catering for the needs of a diverse range of students. These include, but are not limited to, support services for those in need of financial help, disabled students and for counselling and health services. Institutions fund these costs through fee income (up to a maximum of £9,250) and government grants for higher cost subjects. Even with government grants, on average, institutions make a loss of £2,000 or more on some higher cost subjects, and fees cannot rise on these subjects to recover the loss. To break even institutions charge more than the cost for lower cost subjects. Small and specialist institutions have differing cost bases and face their own specific issues.<sup>39</sup>

Institutions also make a loss on the costs associated with undertaking research, and income received from other sources (such as international students, postgraduate students) is used to plug this gap – although a significant deficit remains.<sup>40</sup>

Individual institutions could provide greater context to their own pricing decisions to students and government. This could be backed by information being made available on their cost base and how they fund the student experience, based on their income flows. Students would like to see more information on how their university spends its fee income, a breakdown of income and expenditure, and to compare costs incurred on their course to other courses both within their university and with other universities.<sup>41</sup>

**Universities UK recommends that institutions develop their value for money statements required by the Office for Students to be accessible to students as the primary audience and explain:**

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<sup>38</sup> Note that these figures are averages and costs vary across institutions. Universities UK calculations based on subject costs from HEFCE (2012) ‘High cost subjects analysis using TRAC(T) data: detailed commentary’ updated to 2018–19 prices using March 2018 OBR figures for RPI trends.

<sup>39</sup> See submission from Chairs of the Specialist Institutions Forum and Conservatoires UK to the post-18 review’s call for evidence.

<sup>40</sup> HEFCE (2017) TRAC data 2015–16: sector analysis. The 2012 reforms to higher education increased average university funding per student by 25% between 2011–12 and 2012–13 – but this figure has two important qualifications. It does not include cuts to teaching capital grants, and also significant cuts had already been made to teaching grant funding prior to 2011–12. Between 2006–07 and 2016–17 average real terms funding per student increased by 2.7%, and actually decreased by 1.6% if reductions to teaching capital are factored in.

<sup>41</sup> Office for Students (2018) *Value for money – the student perspective*

- how pricing decisions for undergraduate courses were arrived at
- the cost base of the institution and how it varies across different subjects
- how the institution uses fee income, and other sources of income, to fund the student experience
- how the institution uses sources of income to fund other activities such as research and knowledge exchange

Mechanisms can be used to induce greater variation in fee levels (for example by cost of subject or by level of graduate earnings). This poses many practical difficulties and risks:

- The system could become more difficult to understand and distort the decision making of prospective students. Students from more disadvantaged backgrounds or those concerned about future debt levels may choose cheaper courses of study to the detriment of achieving their potential. In Australia, the share of males from a low socioeconomic background declined by 38% in the most expensive courses following the introduction of differential charges.<sup>42</sup>
- Linking fee levels to course costs would require significant increases in either fees or government grant funding for higher cost subjects, or it would not be financially viable for institutions to continue providing these subjects in the numbers needed to meet student and employer demand.
- Linking fee levels to graduate earnings would not be a significant improvement on the current system, which already links graduate earnings to the total amount of loan repayments. It could also have the added disadvantage of increasing demand for areas with lower fees and lower salary outcomes, with knock-on effects for the UK's supply of skills.

Some careers and professions have sustained skills shortages which hold back the UK's ability to increase productivity and deliver public services. Where there is evidence of a prolonged skills shortage – set to continue over the medium term – there could be scope to incentivise graduates to pursue these professions or careers to mitigate skills shortages. This could be achieved by introducing more favourable repayment terms for graduates pursuing these careers.<sup>43</sup> The government is undertaking a pilot of a student loan reimbursement scheme for teachers to increase recruitment and retention in areas of greatest need. **Universities UK recommends that a pilot of a student loan reimbursement scheme be**

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<sup>42</sup> Research, Analysis and Evaluation Group (2002) *HECS and opportunities in higher education: A paper investigating the impact of the Higher Education Contributions Scheme (HECS) on the higher education system*. The report notes that this directly affected a small number, around 100 persons, in comparison with the size of the overall domestic student population. A separate [report](#) concludes that HECS did not discourage university participation among individuals from low wealth groups.

<sup>43</sup> There could be a link with the Migration Advisory Committee shortage occupation list. Qualifying graduates could have their loans could be written off more quickly, the rate of repayment could be lower, and/or the interest rate would not apply.

**launched to encompass a range of careers and professions where there is evidence of a prolonged skills shortage.**

There is an added need to **better match graduate skills with employer demand at the local level.**<sup>44</sup> The Skills Advisory Panels currently under development could aid this, through government support for networks of local universities, employers and stakeholders to encourage employer demand for graduate employment and work experience, match the best possible candidates to the opportunities, and ensure opportunities are more widely available than currently.

*It is not financially viable for universities to compete on price, but they compete in many other ways*

In their assessment of the higher education sector in 2014, the Office for Fair Trading saw no evidence of explicit or tacit collusion between higher education institutions with respect to fee setting.<sup>45</sup> Higher education institutions compete with alternative providers, who have different cost models and may charge lower fees. Competition will increase following the passage of the higher education and research act and the expected substantial increase in the number of higher education institutions.<sup>46</sup> However the general lack of price differentiation has led to a lack of confidence in the extent of competition in the higher education market.

There are a wide range of ways that competition takes place in the domestic higher education market other than on price. It is in an institution's best interest to make cost and efficiency savings. Universities across the UK reported making £1.4 billion of efficiencies in 2015, with more than £1 billion delivered in England over the previous three years.<sup>47</sup> Institutions compete for students through developing their own unique course offerings, high-quality teaching and learning facilities, and investing in career services to achieve high employability outcomes for graduates. Initial evidence collected by Universities UK's flexible learning project shows that over the past five years, there have been significant changes to the course offerings of institutions – including more online courses, greater tailoring of courses to employer needs, and shifts to shorter, and more intensive, courses.

The Office for Students (OfS) has a statutory duty to encourage competition between English higher education providers in the interests of students and employers. It will be necessary for the OfS to focus on encouraging competition between institutions on the basis of the quality of the teaching and learning experience – not just on the basis

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<sup>44</sup> Universities UK (2017) *Graduate retention: meeting local skills needs*

<sup>45</sup> Office for Fair Trading (2014) *Higher education in England: an OFT call for information*

<sup>46</sup> Department for Business, Innovation and Skills (2016) *Impact assessment: higher education and research bill*

<sup>47</sup> Universities UK (2015) *Efficiency, effectiveness and value for money*

of price. The OfS will need to assess value for money to students so that it encompasses the full benefits of higher education.<sup>48</sup>

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<sup>48</sup> Research by the OfS shows that quality of teaching, fair assessment and helpful feedback and learning resources are the factors which most demonstrate value for money for students. OfS (2018) *Value for money: the student perspective*