

BIS Consultation: applying student number controls to alternative providers

Institutional response on behalf of City and Guilds of London Art School

Question1: Respondent Details:

- **Name of organisation:** City and Guilds of London Art School
- **What type of organisation is it?** Alternative Provider

Question 2: Do you have a preference for Method 1 (control based on eligible students) or Method 2 (control based on students accessing funding)? If so, why is this?

Our preference would be for method (1). Relative to other institutions the numbers graduating from the School's designated programmes would never be high, but to be able to maximise the number of beneficiaries among those who are eligible would be extremely helpful to our enterprise **overall**: since the school also offers non-designated programmes, it follows that a large proportion of our total student body will need to be self-financing or in receipt of bursaries from philanthropic sources which have to be nurtured and, by their nature, consistently re-negotiated. To us, the reliability of the loan scheme for at least part of our total cohort is very important.

Question 3: What is your view on submission of data to HESA? Do you think designated courses at alternative providers should participate in the Key Information Set and therefore complete the National Student survey and Destination of Leavers in Higher Education survey (if student numbers are large enough to permit this)?

The number of graduating students from our own designated programmes in any given year is comparatively small (c.25 – 30). Statistical evidence produced annually to reflect student feedback from so small a cohort is more likely to exaggerate the significance of both approval and criticism than it would be in the context of much larger numbers when the random and the thematic can be easily differentiated; ten per cent of a cohort of ten, evidently, will be a single individual, whose 'grievance' might be legitimate or otherwise but which does no real service either way for being publicised. If the provision of the feedback data to HESA was to become obligatory it might be more reliable in its implications if submissions were made at intervals of three years -i.e. the duration of a typical three year BA programme.

Question 4: Are there any other methods for controlling student numbers on designated courses at alternative providers that you would recommend instead of Method 1 or Method 2?

Except where an institution's numbers are very large, it seems unnecessary to complicate the matter of choice beyond the two alternatives already given; there is, anyway, indirect control of a kind available in the form of unrestricted access to the loan scheme for high-achievers at A-level.

Question 5: Do you agree that there should be an exemption from student number controls for alternative providers with small numbers of students accessing student support? If so, do you have suggestions as to how the Department should define ‘very small’?

We **do** feel that there is a case for exemption from student number controls for alternative ‘specialist’ providers which, like ourselves, are not committed to significant further expansion, but also for the reason given in response to question (2) – i.e. that reliable support for designated programmes, to some extent alleviates the pressure of needing always to raise the bursaries necessary to maintaining student numbers at optimum levels (both financial and academic) on non-designated programmes.

Question 6: Equality considerations: Do you think that the proposals for applying student number controls will have any equality implications (e.g. positive, negative or neutral) for people with protected characteristics (as set out in the Equality Act 2010), or people from low income groups? What impacts might there be and do you have any evidence of possible impacts?

The circumstances of low-income backgrounds **need** not, but often **will** impact negatively on secondary education performance, in which case the individuals concerned will be more frequently excluded from the same exemption clause that confers privilege on others.

Question 7: Do you have any other comments on the proposals within this consultation document?

No doubt unlikely, but a not unreasonable possibility? – might be that certain established, skill-based and **vocationally** orientated programmes such as our own Historic Carving Courseⁱ (and as with some conservatoires?), might be accorded special status, which is to say given access to the loan-scheme despite not being designated programmes. The learning experience they provide is a possibly unique combination of technical training and education, delivering craft-skills that are reliably employable and often said by informed interests (and paradoxically) to be both in demand and in decline. Applicants are frequently from less than privileged backgrounds, would mostly be unable to finance their studies independently and are therefore reliant on the school’s ability to access bursary funding on their behalf. We do not graduate excessive numbers of students but those that the School has produced over many years have delivered great service to the continuous refurbishment and enhancement of architectural heritage in the U.K. This proposal is, of course, mindful that alternative providers credited with Highly Trusted Status will, in future, be subject to regular monitoring by the QAA.

Tony Carter
Principal

ⁱ Website links: http://www.cityandguildsartschool.ac.uk/courses/courses1/diploma_in_architectural_stone_carving
http://www.cityandguildsartschool.ac.uk/courses/courses1/diploma_in_ornamental_wood_carving_and_gilding