



# The Comprehensive Spending Review

September 2020

## About GuildHE

*GuildHE is an officially recognised representative body for UK Higher Education. Our members include universities, university colleges, further education colleges and specialist institutions from both the traditional and private sectors. Member institutions include some major providers in professional subject areas including art, design and media, music and the performing arts; agriculture and food; education; law, business and finance; the built environment; health and sports.*

## Overview of our submission document

1. We welcome the opportunity to respond to the Comprehensive Spending Review (CSR) in order to demonstrate how smaller and specialist universities, colleges and other higher education providers (HEPs) found throughout the United Kingdom can make essential contributions to the government building back better and achieving its immediate and long-term objectives.
2. This document splits into three parts:
  - 2.1. A summary of our recommendations based upon government objectives
  - 2.2. Further policy ideas, detail and evidence grouped under each of the six CSR questions
  - 2.3. Some specific, detailed evidence is included in Annexes A&B.

## Summary of our recommendations

1	Strengthening the UK's economic recovery from COVID-19 by prioritising jobs and skills
	<i>Recommendations</i>
	<ol style="list-style-type: none"> <li>1. Introduce capital funding for digital technology innovation to teach the skills of tomorrow, including in continuing investment in national broadband connectivity</li> <li>2. Commit to a credit based funding approach to higher education (HE) that will encourage greater participation in technical and part-time study</li> <li>3. The apprenticeship levy should be more flexible and also fund other accredited HE qualifications and short courses with suitable industrial experience components</li> </ol>
2	Levelling up economic opportunity across all nations and regions of the country by investing in infrastructure, innovation and people – thus closing the gap with our competitors by spreading opportunity, maximising productivity and improving the value add of each hour worked
	<i>Recommendations</i>
	<ol style="list-style-type: none"> <li>1. Triple the size of the Higher Education Innovation Fund (HEIF) to £750m and reform it by removing the lower allocations threshold to support regional business recovery and growth</li> <li>2. Increase the funding allocated to Strength in Places to £500m and add mechanisms to enable less economically advanced parts of the UK to benefit from the Fund</li> <li>3. Introduce more flexible definitions of, and funding for, innovation to enable the best ideas to emerge and grow throughout the UK</li> </ol>

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3	Improving outcomes in public services, including supporting the NHS and taking steps to cut crime and ensure every young person receives a superb education
	<i>Recommendations</i>
	<ol style="list-style-type: none"> <li>1. Invest in teacher education to ensure that every young person receives a superb education</li> <li>2. Increase investment in the National Careers Service so that young people are more informed about post-16 options</li> <li>3. Ensure all students regardless of background continue to have access to higher education</li> <li>4. Review the level of maintenance loans and reintroduce maintenance grants for disadvantaged students to achieve strong outcomes for a diverse mix of students throughout the UK</li> <li>5. Meet the full cost of higher education teaching for high cost subjects in specialist institutions and for students with more complex needs to ensure choice and quality</li> <li>6. Recognise that higher education has a wider social value and impact on public services than individual economic returns</li> </ol>
4	Making the UK a scientific superpower, including leading in the development of technologies that will support the government's ambition to reach net zero carbon emissions by 2050
	<i>Recommendations</i>
	<ol style="list-style-type: none"> <li>1. Immediately double the amount of quality-related (QR) research funding and devolved equivalents, ensuring that all rise with at least inflation each year. At the same time, reform the distribution of QR funding to provide targeted support for smaller research organisations with potential for growth to increase scientific excellence across the UK</li> <li>2. Introduce a Research and Innovation Kickstarter Fund within expanded RED and E3 Funds</li> <li>3. Expand the eligible recipients for specialist institutions beyond its narrow definition and increase funding to £50m per year</li> </ol>
5	Strengthening the UK's place in the world
	<i>Recommendations</i>
	<ol style="list-style-type: none"> <li>1. Introduce stabilisation funding to ensure UK institutions maximise their export potential</li> <li>2. Introduce the UK Shared Prosperity Fund, ensuring it at least equals the amount of money received through previous EU structural development funding by investing in capacity and capability throughout all sectors of the economy and all regions and nations of the UK <ol style="list-style-type: none"> <li>a. This should include making universities and other HEPs part of the core infrastructure for levelling-up prosperity and driving overseas investment by allocating funding directly to them for these purposes</li> </ol> </li> <li>3. Invest in collaborations and networks through at least maintaining current levels of GCRF</li> </ol>
6	Improving the management and delivery of our commitments, ensuring that all departments have the appropriate structures and processes in place to deliver their outcomes and commitments on time and within budget
	<i>Recommendations</i>
	<ol style="list-style-type: none"> <li>1. Maintain regular engagement with stakeholders</li> <li>2. Encourage greater government cross-departmental working and collaboration including with devolved administrations and regions</li> <li>3. Value people by encouraging and inspiring civil servants to develop expertise and careers within their departments rather than having to move to progress</li> </ol>

# 1. Strengthening the UK's economic recovery from COVID-19 by prioritising jobs and skills

The higher education sector is well positioned to support the recovery and growth of all parts of the UK due to its diversity

- Professional, vocational and technical education and practical research are essential to drive local, regional and national social, cultural and economic growth. Specialist and smaller universities, colleges and other HEPs play fundamental, crucial roles in achieving this growth. They bring together higher, further and work-based learning within the same institution rooted in a long track-record of community engagement. They are well positioned to support the UK's economic recovery and future growth.
  - For example, regional, specialist, creative higher education providers help fulfill current skills gaps due to their close-to-industry courses and involve collaboration with businesses in many parts of the creative economy, whether that is with animation or cyber security<sup>1</sup>. 22% of creative arts and design students study at UKADIA institutions<sup>2</sup>.
  - GuildHE members support highly-skilled talent for key industries. For example, GuildHE institutions account for 41% of undergraduate and postgraduate students studying agriculture and related subjects in the UK<sup>3</sup>.
- We outline three recommendations that would enable specialist and smaller universities and colleges to support the skill and jobs recovery.

## 1. Introduce capital funding for digital technology innovation to teach the skills of tomorrow, including in continuing investment in national broadband connectivity

- HE providers rapidly adapted to providing teaching and learning online as a result of the pandemic. However, it has been harder to replicate large practical elements built into the curriculum, or where open dialogue is a key part of the pedagogical practice due to the lack of infrastructure to support such a style of learning.
- The delivery of innovative and award winning creative education<sup>4</sup>, necessarily involves high costs such as technical facilities, studios and specialist staff. This is also the case for other practical STEM disciplines where face-to-face technical learning is hard to replicate digitally without significant investment. Online learning is also prohibitively expensive for smaller institutions to run long term, and the current funding levels do not cover the necessary infrastructure costs to deliver this in many providers - unless it is a broad institutional initiative from a large provider (e.g. the Open University).
- GuildHE has been working with JISC to understand what would be needed in order to digitise this style of learning, and we believe **Capital Funding to improve the technological infrastructure is essential in order to deliver flexible**, accessible and valuable learning experiences to develop the graduate-level skills required by all parts of the economy.
- We are also mindful of the digital poverty felt by many of our students. We have been working hard to ensure that all of our students regardless of background have access to the internet and equipment to enable them to access the right digital content.

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<sup>1</sup> See <https://guildhe.ac.uk/practice-informed-learning-the-rise-of-the-dual-professional/>

<sup>2</sup> Based on GuildHE/ UKADIA analysis of HESA subject data 2018-19

<sup>3</sup> Based on GuildHE analysis of HESA subject data 2018-19

<sup>4</sup> Teaching Excellence Framework (TEF) results were above average for creative institutions. Of the 13 specialist institutions in UKADIA, 7 were gold, 5 silver and 1 bronze. 8 institutions received single or double positive flags for graduate outcomes.

- We therefore also urge the government to **continue to prioritise ensuring everyone in the UK has access to high speed broadband**.
  - Many of our members are situated in rural and coastal areas where the national infrastructure is not yet sufficient to provide stable access to a digital university experience.
  - This couples with the prohibitively expensive suppliers of broadband, creating an inequality in the educational experience which universities are not able to address. If the government wants more flexible provision, it must address the national infrastructure and expense to enable all of society to engage in higher-level learning.
  
- 2. **Commit to a credit based funding approach to higher education (HE) that will encourage greater participation in technical and part-time study**
  - We support the government push to encourage more students to undertake level 4-5 qualifications, but this must form part of a suite of activities which improves the educational attainment of all in society. We support the intention to improve the funding and support for further education (FE), but wish to reiterate that HE and FE often work in tandem to provide progression opportunities and coordinated technical training and should not be put in direct competition with each other.
  - **Credit based funding should be introduced** to enable the government to realise its vision for a flexible approach to gaining higher level qualifications.
  - Having a flexible approach to enable students to fund HE through the loan system will encourage greater part-time participation, a less complicated approach to accelerated degrees, and support the expansion of higher technical qualifications and level 4-5 delivery.
  - At present, the HE funding package discourages students from undertaking more flexible learning as it is more complex to understand. It also penalises students who wish to change provider or programme, or change career as they have to sacrifice a whole year's worth of Student Loan funding to do so.
    - The vast majority of HE providers structure their courses based on credit, and the National Framework for HE Qualifications<sup>5</sup> is also designed around the concept. Therefore it would not significantly disadvantage any HE provider if a credit-based system were to be implemented. This also works at postgraduate level, which is important as much of the industry CPD requests are at PG level.
  - **Part-time HE needs a different funding model of lower headline fees topped up with extra teaching grant.** This would reflect the generally lower cost to the public purse because most part-time students are working.
    - At higher qualification levels, part-time study allows students to bring their research into their professions and take it back into academia. This means that stronger practice is developed as well as theory, providing immediate benefits to employers as well as longer term benefits. However, there has also been a decline in part-time research study<sup>6</sup>.
  - Because student loan interest payments are calculated from the day the first amount is credited to the student, by the time a part-time student graduates, they could already have at least seven years worth of interest added onto their debt. This makes it more expensive for the student to study part-time. We recommend that government amend this calculation for part-time students.

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<sup>5</sup> <https://www.qaa.ac.uk/quality-code/qualifications-and-credit-frameworks>

<sup>6</sup> <https://www.hepi.ac.uk/wp-content/uploads/2020/05/Postgraduate-Education-in-the-UK.pdf>

- We also recommend that government actively funds more part-time research students as part of the solution to increase research capacity and business interactions to drive growth<sup>7</sup>.

### 3. The apprenticeship levy should be more flexible and also fund other accredited HE qualifications and short courses with suitable industrial experience components

- The apprenticeship levy must be more flexible because many employers simply do not have the capacity to take on a full-time apprentice but wish to be able to use their levy to upskill staff in other ways (often through bitesize CPD training with a HE or FE partner).
- At present similar qualifications (degrees and degree apprenticeships) have very different financial incentives and it distorts the choices made by students and employers. It is unsustainable to have two funding routes to the same qualification level where through one all the cost contribution falls on the graduate, and through the other, all the cost falls on the employer. The data has shown that this further entrenches unequal access to HE, with more affluent students far more likely to undertake a 'free' degree apprenticeship<sup>8</sup>.

#### Simplifying regulation and cutting bureaucracy

- Higher education has a long history of working in partnership with further education and industry, especially Professional and Statutory Regulatory Bodies (PSRBs). They are intertwined with the quality assurance infrastructure and we place a great emphasis on providing the very best standard of technical education.
- We, of course, recognise that the Government must be satisfied with the quality of Technical Education, however IfATE's route panel processes coupled with Ofsted's interventions for higher apprenticeships has made the delivery of these qualifications more bureaucratic and more costly.
- We have also seen IfATE go against the wishes of long-standing and reputable PSRBs in the decisions it has made on apprenticeship provision, evidenced by the slow rate of progress in agreeing new apprenticeship standards.
- We have additional concerns that the current trailblazer and route panel process is secretive and exclusive. This creates unnecessary barriers to other groups forming, or delivery providers planning for future delivery and actively discourages HE institutions to engage in the policy.
- Considering the recent statement from the Government on the promise of a reduction of bureaucracy in the sector<sup>9</sup>, we wish for there to be a review of the way in which HE providers can engage with the technical education policy reforms that span over multiple types of institution.
  - This could include being exempt from Ofsted inspections and data returns and instead use the robust HE regulatory processes through the OfS where these qualifications are already regulated in parallel.
  - To this end we reject the Augar recommendation that Ofsted should be responsible for quality assessing levels 6 and 7 as this would duplicate regulation and fundamentally misunderstand the relationship between theory and practice at levels 6/7. This will discourage many more HE providers from engaging in the L4/5 qualification reforms and apprenticeship delivery.

<sup>7</sup> GuildHE Research members have ability and experience in delivering part-time doctorates. Over 60% of our PGR students are part-time, compared to a sector average of 23%.

<sup>8</sup><https://www.officeforstudents.org.uk/media/c791216f-a1f1-4196-83c4-1449dbd013f0/insight-2-degree-apprenticeships.pdf>

<sup>9</sup><https://www.gov.uk/government/publications/reducing-bureaucratic-burdens-higher-education/reducing-bureaucratic-burdens-on-research-innovation-and-higher-education>

## 2. Levelling up economic opportunity across all nations and regions of the country by investing in infrastructure, innovation and people – thus closing the gap with our competitors by spreading opportunity, maximising productivity and improving the value add of each hour worked

### Levelling up means investing in the full spectrum of research and development

- Major national assets, especially the large, research intensive universities, are concentrated in the South East. Public investment and business investment is concentrated here which suggests that when you invest more public money, more private money follows<sup>10</sup>.
- The Nesta report, *The Missing £4 Billion*<sup>11</sup>, goes into much further depth and identifies several barriers. We believe that many of the recommendations made will support the economic, social and cultural recovery and growth of the UK.
- As part of the levelling up agenda, it is important to consider the attractiveness of place. The physical and cultural assets of places are often overlooked<sup>12</sup>. You need to develop places where people want to live and work otherwise big investments will result in commuter communities. You need to work with and for communities to work out what is important to them<sup>13</sup>.
- This means widening the focus from regional inequalities (although these remain stark and require immediate, sustained and significant focus) to recognise that localised inequalities can be masked by a broad geographic focus. There are other important lenses to examine inequalities such as considering coastal, rural and inner-city places as well other places where there may be small pockets of deprivation which are masked by the broader wealth of the area.<sup>14</sup>
- Within this context, smaller and specialist universities generate multiple positive impacts for their communities, their wider regions and the national economy and must be seen as important partners in order to reach levelling up and socioeconomic targets.
  - They are, for example, actively engaged in LEPs, with local authorities, with different communities and make measurable contributions to the places where they are based and industries and professions that they support.<sup>15</sup>
- We make three recommendations here and also highlight our response to “making the UK a scientific superpower” which is also relevant to this question:

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<https://industrialstrategycouncil.org/universities-and-colleges-and-industrial-strategy-exploring-data-knowledge-exchange-research-and>

<sup>11</sup> <https://www.nesta.org.uk/report/the-missing-4-billion/>

<sup>12</sup> <https://www.artscouncil.org.uk/sites/default/files/download-file/placemaking%20wavehill.pdf>

<sup>13</sup> <https://icstudies.org.uk/our-approach/safety-numbers>

<sup>14</sup> <https://civicuniversitynetwork.co.uk/>

<sup>15</sup> See the following for evidence and examples:

- Excellence in Diversity  
<https://www.guildhe.ac.uk/wp-content/uploads/2015/07/Excellence-in-diversity-Full-report-2-July-20151.pdf>
- Innovation systems and the role of small and specialist HEIs.  
[https://issuu.com/guildhecrest/docs/crest\\_innovation\\_systems\\_single\\_pa](https://issuu.com/guildhecrest/docs/crest_innovation_systems_single_pa)

## 1. Triple the size of the Higher Education Innovation Fund (HEIF) to £750m and reform it by removing the lower allocations threshold to support regional business recovery and growth

- HEIF is a highly effective funding method<sup>16</sup> and government has already committed to increase it to £250m<sup>17</sup>. Knowledge exchange is the key function that allows research and teaching to translate into economic, social and cultural growth. The full range of activities that KE entails must be funded so that more translation takes place to achieve the government's 2.4% GDP target.
- To enable the positive effects from HEIF to be realised across the UK it must be reformed by removing the lower threshold for distributions and adding a regional weighting<sup>18</sup>.
- Smaller and specialist universities are agile and can maximise impact from smaller investments due to simpler infrastructure and closer-to-market research. Amending the HEIF distribution would give them the potential to drive long term socioeconomic growth in a way that they previously have been hindered from doing in a sustainable way. Planned, annual, allocations would go a long way by providing certainty, not just for the universities, but also for the businesses and communities that they serve and with which they generate economic impact.
- Those smaller HEIs that have HEIF have been able to drive growth for their towns (eg Worcester) or industries (eg agriculture). However, they have sacrificed other promising research initiatives and knowledge brokerage in order to continue to secure HEIF due to being so near the meaningless minimal threshold. Removing this minimal threshold would enable smaller and specialist institutions to unleash their untapped potential.
- If the total HEIF pot is increased and the lower threshold removed, then the minimum allocation should be increased from £250,000 to £500,000 for those institutions that already receive HEIF.
  - HEIF should be introduced on a scaling up principle for those institutions that are eligible but do not currently receive HEIF. For example, in the first year an institution receives a minimum allocation of £250,000 that increases to £500,000 the next year. Or they could receive an allocation that matches their earned income and scale up from there. This would allow institutions to plan and embed their KE operation and to invest in the important external relationships to drive social, cultural and economic growth.
  - These two measures would positively impact locations predominantly outside of the South East and institutions that provide vital services to key industries such as agriculture and the creative economy with the total cost equating to around £25m across the two years.

## 2. Increase the funding allocated to Strength in Places to £500m and add mechanisms to enable less economically advanced parts of the UK to benefit from the Fund

- Strength in Places is an innovative fund that supports cross-sector, cross-border collaboration with a place focus and one that allows bidders to define their own geographical boundaries. However, it is set up to support economies that already have some scale and element of excellence in research: the funding and ambition on offer is too high for developing economies in other parts of the UK.
- Similar to the Nesta recommendation<sup>19</sup>, we recommend that Strength in Places is expanded. We recommend that this is increased to £500m in order to support more advanced local economies as well

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<sup>16</sup> <https://core.ac.uk/download/pdf/20090197.pdf>

<sup>17</sup> <https://www.gov.uk/government/publications/industrial-strategy-building-a-britain-fit-for-the-future>

<sup>18</sup> See Annex A for analysis of current funding

<sup>19</sup> <https://www.nesta.org.uk/report/the-missing-4-billion/>. See Recommendation 10, p.68 As mentioned, we support the main recommendations in the rest of the report, including the regional adaptation of QR and HEIF.

as less advanced economies (which would require less funding but more support in order to grow capacity). It should have synergies with the UK Shared Prosperity Fund.

- At the same time, the lower bid threshold should be decreased from £10m to £5m to enable emerging economies to develop research and innovation strengths that work for them and in turn lead to wider socioeconomic growth.

### 3. Introduce more flexible definitions of, and funding for, innovation to enable the best ideas to emerge and grow throughout the UK

- We support the CBI's advocacy for end-to-end support for research and development that covers applied research and knowledge exchange as well as discovery research<sup>20</sup>. Innovation can take time to develop before it yields economic benefits for local regions and communities. Quick wins without strong foundations will not be sustainable. Therefore projects should ideally have a long timeframe with phased development. For example this might be three years research and development, plus two years for product to market.
- Excellence in innovation should involve looking at innovation in teaching where excellent knowledge transfer can take place and lead to growth in particular industries and regions. For example, Abertay University's approach to supporting the cybersecurity industry involves student placements with relevant companies, allowing genuine two-way learning experiences<sup>21</sup>.
- We believe that the following package would enable experimental innovation across the UK:
  - A **research and innovation recovery and growth fund** for smaller and micro companies, similar to Innovate UK funding, should be considered, with lower levels of match funding permitted, by adapting schemes run by the British Business Bank, Creative England and Innovate UK. This is particularly the case for KTPs in the creative sector - it is hard for smaller companies to provide funding even when they see the need to invest in R&D.
    - For example, flexible proof of concept small-scale funding such as Business Innovation Vouchers (eg £5k-£10k) have been successful in allowing collaborations with business to start and test potential innovations.
    - This fund should form part of the UK Shared Prosperity Fund - see more in our response to Question 5.
  - The **Teaching and Knowledge Exchange competition**<sup>22</sup>, operated by the Office for Students and UKRI, should be expanded given the level of interest in the Fund (nearly 100 applications). It is a good example of an intervention that could transform the way KE delivers results and should be funded through our proposed increase in HEIF.
  - We also support DCMS and the Creative Industries Federation's recommendations on **extending the Creative Scale Up Programme and reforming R&D tax credits**<sup>23</sup>.

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<sup>20</sup> <https://www.cbi.org.uk/articles/don-t-wait-innovate/>

<sup>21</sup> Further examples can be found at <https://guildhe.ac.uk/practice-informed-learning-the-rise-of-the-dual-professional/>

<sup>22</sup>

<https://www.officeforstudents.org.uk/advice-and-guidance/funding-for-providers/knowledge-exchange-funding-competition/>

<sup>23</sup>

<https://join.creativeindustriesfederation.com/reimagine/>



### 3. Improving outcomes in public services, including supporting the NHS and taking steps to cut crime and ensure every young person receives a superb education

#### 1. Invest in teacher education to ensure that every young person receives a superb education

- Well trained and highly qualified teachers are an integral part of improving schools. Universities play a key role in training teachers and providing the pipeline of qualified applicants. However, in recent years there has been a shortage of applicants to the profession and increasing numbers leaving the profession. There are many complex reasons for the recruitment and retention issues in the teaching profession but fundamentally we need to do more to encourage good applicants into the profession and then to remain.
- Bursaries to encourage good applicants into teaching should be continued and extended, particularly for highly qualified applicants in key subject shortage areas.
- Retaining highly qualified teachers in the profession is essential and can be supported by writing-off their student loans the longer they remain in the profession, potentially writing-off 30% of student loans three years after getting NTQ status, 50% write-off after five years and the remainder after 10 years<sup>24</sup>.

#### 2. Increase investment in the National Careers Service so that young people are more informed about Post-16 options

- There is a serious gap in the information, advice and guidance given to young people about their future options throughout their school career.
- Top independent and high performing secondary schools are able to invest more in careers guidance to support their pupils. It is impossible for the majority of schools, especially those in poorer regions, to offer such tailored careers advice. It is unreasonable to expect schools to understand the nuances of which qualifications are required for each potential career path.
- There should be additional investment in the National Careers Service to support schools, parents and students regardless of background (or age) to access good quality and up to date careers information.
- This will also help government meet its aims for more citizens to undertake level 4-5 qualifications as we know that a key barrier to engagement is a lack of understanding of what these qualifications are and the currency they have with employers. It may also stop some young people from going to university 'by default' where they still don't know what their career choices are.

#### 3. Ensure all students regardless of background continue to have access to higher education

- There is resounding evidence that school attainment plays a substantial role in defining young people's future careers and educational engagement post 18.
- GuildHE institutions pride themselves on providing a supportive and successful student experience to all students, recognising that prior educational attainment is not always a reflection of talent and ability.
- Because many smaller and specialist providers offer industry focused qualifications, and/or are located in areas where the academic attainment of school leavers is lacking, we have developed Year 0

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<sup>24</sup>DfE is currently piloting this scheme: [www.gov.uk/guidance/teachers-claim-back-your-student-loan-repayments](http://www.gov.uk/guidance/teachers-claim-back-your-student-loan-repayments)

foundation year provision to support students with the potential to succeed, but are deficient in specific skills and often the confidence to be a successful HE student.

- We take the recruitment of mature learners very seriously who often need additional support to get back into HE after long periods away from school and/or without the prerequisite school level qualifications. Our members also recruit a large number of disabled students into their programmes and have a much higher percentage of disabled students compared to larger HEIs.
- Foundation years are an additional way to support students who may have complex needs and would benefit from the opportunity to have additional time to engage with the academic content of the programme, as well as plugging any knowledge deficits they may have had whilst in the school system.
- We therefore reject the analysis of the Augar Post-18 review that believed they were of no value to students.
- We have previously written to DfE outlining the many ways the Integrated Foundation year is vital to successful access strategies for our members and their students, especially for those students from non-traditional academic backgrounds or mature learners seeking access to higher education who experienced significant disadvantage in secondary school.
- Any restriction to funding Foundation years would have a catastrophic impact on Access and Participation for our most vulnerable and disadvantaged students.

#### **4. Review the level of maintenance loans and reintroduce maintenance grants for disadvantaged students to achieve strong outcomes for a diverse mix of students throughout the UK**

- Living costs have risen significantly since the last major review of the loan system in 2012.
- At present for the vast majority of students, the maintenance loan does not even cover their rental costs. Universities do not supply the vast majority of student housing, and therefore are unable to keep rent to a minimum level. There is an over-reliance on parents funding this shortfall, which in many cases cannot or does not happen, even for students living at home. It is also increasingly more expensive to live in all major UK cities, and therefore not only London students require a higher living loan.
- Relying on individual providers to offer bursaries to disadvantaged students to plug this funding shortfall has not proven to be fair to all students. A disadvantaged student in a wealthy university where there are few such students is more likely to receive a much higher bursary than if they go to an institution with a larger number of disadvantaged students.
- Maintenance grants should therefore be reintroduced. GuildHE has argued previously for reintroduction of maintenance grants for low income students<sup>25</sup>.
- We support the Augar recommendation that “students from low-income households should receive a substantial part of their maintenance support in the form of a grant in order to reduce their level of debt on graduation. We recommend a minimum grant of £3,000 per year for those with the maximum entitlement.”<sup>26</sup>

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<sup>25</sup> <https://wonkhe.com/blogs/the-cost-of-doing-the-right-thing-by-part-time-students/>

<https://guildhe.ac.uk/wp-content/uploads/2018/08/LE-GuildHE-Student-support-modelling-06-08-2018-STC.pdf>

<sup>26</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/805127/Review\\_of\\_post\\_18\\_education\\_and\\_funding.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/805127/Review_of_post_18_education_and_funding.pdf) pg191

## **5. Meet the full cost of higher education teaching for high cost subjects in specialist institutions and for students with more complex needs to ensure choice and quality**

- For many students, studying at a smaller or specialist institution is attractive. Smaller and specialist higher education providers allow students to live out this diversity of choice in the tertiary education system<sup>27</sup>.
- The KPMG costing study<sup>28</sup> that accompanied the Augar analysis showed average teaching costs were close to or above the tuition fee and (where applicable) higher cost subject funding provided, depending on subject area. KPMG also noted that factors driving higher costs included being located in London, being smaller in size, having a more limited range of provision and a lower number of students in their staff to student ratio. While overall funding for teaching is set at about the right level, OfS grants need to meet the costs of high cost subjects in specialist institutions and for students with more complex needs to ensure choice and quality.
- Large HEIs have multiple and diverse income streams from research and international students and have often been more likely to benefit from Government financial assistance during the pandemic. Small higher education providers operate at a much lower scale, with limited amounts of international student fee income. They face barriers to diversifying their income as their size is counted against them in many bidding processes. Specialist institutions where all of their courses are high cost cannot cross subsidise from lower cost courses.
  - HEFCE's review of Institution Specific funding in 2015 demonstrated that these sorts of institutions' costs of teaching are significantly, and justifiably, higher than can reasonably be met through fees and that they were taking reasonable measures to meet these higher costs through effective management.
  - Additional grant funding, like Institution Specific funding, is essential for these world class, and also nationally significant, specialist institutions<sup>29</sup> to provide a high quality education<sup>29</sup>. Funding should be increased so that the full diversity of specialist institutions facing higher costs are adequately supported.

## **6. Recognise that higher education has a wider social value and impact on public services than individual economic returns**

- When calculating the value of a degree it is important not just to think about "value" in relation to the ability for graduates to repay their debt. Continuing education after 16 is proven to make citizens healthier, happier, and more productive. Continuing engagement in education post 16 is also a key way to cut crime and education is a fundamental pillar to rehabilitate past offenders. Investing in HE improves the life chances of all those who engage, and they in turn make communities better places to live<sup>30</sup>.
- Government also needs to recognise that not all highly skilled careers are lucrative and high earning, especially those that support key public services. For example, agricultural careers, which are vital for the economy and for national food security, are not necessarily 'high earning'. It is particularly important

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<sup>27</sup> <https://guildhe.ac.uk/excellence-in-diversity-a-report-celebrating-the-diversity-of-uk-higher-education/>

<sup>28</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/909349/Understanding\\_costs\\_of\\_undergraduate\\_provision\\_in\\_higher\\_education.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/909349/Understanding_costs_of_undergraduate_provision_in_higher_education.pdf)

<sup>29</sup> The same is true with specialist research funding - see our response to Question 4.

<sup>30</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/524013/education-review-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524013/education-review-report.pdf)

that there is a focus on a diversity of career outcomes for such industries to have the high-level skills base needed to address more complex operating environments and the transitions expected under industry 4.0.

- Furthermore, recent research by the Creative Industries Policy & Evidence Centre (PEC)<sup>31</sup> indicates that creative higher education is providing graduates with the high-level creative skills necessary to work within the creative industries and across the creative economy, delivering good value to students in equipping them with the tools they need to enter their chosen careers.
- GuildHE members educate nurses and other professionals in subjects allied to health, such as physios and sports and exercise scientists. Such professionals have proved their worth through the current pandemic<sup>32</sup> in ways that a simple evaluation of graduate salary data blatantly misses.
- Therefore, graduate earnings are a wholly inappropriate measure of economic value. The benefits go further than for the individual graduate - for example, there are multiple “spill-over effects for creative arts graduates that have been estimated to more than double the direct impact of earnings alone”<sup>33</sup>.
- In making critical funding decisions, government must look beyond existing metrics such as Longitudinal Education Outcomes (LEO) data to ensure that the nature of the early career opportunities for many graduates within these sectors does not skew the data which is focused solely on early career earnings<sup>34</sup>.
- It is crucial for government to look at the bigger picture on the impact degrees have on graduates long term: the metrics simply do not measure the true economic or personal value of attending HE in relation to the individual graduate.

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<sup>31</sup> <https://www.pec.ac.uk/research-reports/for-love-or-money>

<sup>32</sup> <https://guildhe.ac.uk/universities-supporting-their-communities/>

<sup>33</sup>

<https://www.guildhe.ac.uk/wp-content/uploads/2018/09/Understanding-the-limitations-of-graduate-outcome-metrics-in-higher-education-18-09-2018-V2.3.pdf>, p.1

<sup>34</sup> Ibid

## 4. Making the UK a scientific superpower, including leading in the development of technologies that will support the government's ambition to reach net zero carbon emissions by 2050

### Making the UK a scientific superpower means realising the potential of research in specialist and smaller universities

- We strongly welcome the continued aspirations and funding commitments from government for R&D. Support for innovation and research and development is key to the long term recovery and growth of the UK. We support the direction of travel outlined in the BEIS R&D Roadmap.
- We firmly support the definitions of science and research in the Roadmap: *“All academic disciplines contribute to the vigour of the research endeavour, including the natural sciences, technologies, medicine, the social sciences, the arts and the humanities. Research and experimental development (R&D) comprise creative and systematic work undertaken in order to increase the stock of knowledge – including knowledge of humankind, culture and society – and to devise new applications of available knowledge.”*<sup>35</sup>
- Within this context, it is important to recognise the current and future economic, social and cultural contributions of smaller and specialist universities. They are closely aligned to the professions that they serve through carrying out practical research and well-positioned to stimulate the growth of key priority economies, such as the creative industries<sup>36</sup>, health, including sports & exercise science<sup>37</sup> and agriculture<sup>38</sup>.
- However, policy support and funding often overlooks these disciplines in specialist and smaller universities, especially those found in poorer parts of the UK or working with less advantaged populations. Increasing support for their research endeavours will result in similar spillover effects as found in larger cities and lead to an increase in excellent research.
- In addition to those suggested by Universities UK, we suggest three policy and funding solutions to further government's science ambitions

#### **1. Immediately double the amount of quality-related (QR) research funding and devolved equivalents, ensuring that all rise with at least inflation each year. At the same time, reform the distribution of QR funding to provide targeted support for smaller research organisations with potential for growth to increase scientific excellence across the UK**

- We agree with others, such as Universities UK and the Russell Group, that there should be a significant increase in the proportion of research funding given over to QR (and equivalent devolved) allocations, rebalancing the dual support system in favour of this more equitable distribution of resources<sup>39</sup>.
- As a block annual grant, or 'strategic institutional support', QR allows excellent research to be undertaken in a wide variety of contexts. QR funding provides the stability institutions need to keep

<sup>35</sup> <https://www.gov.uk/government/publications/uk-research-and-development-roadmap>

<sup>36</sup> <https://guildhe.ac.uk/creative-universities-contribute-more-than-8-billion-to-uk-economy/>

<sup>37</sup> <https://www.physoc.org/policy/sport-exercise-science-education-impact-on-the-uk-economy/>

<sup>38</sup> <http://landex-research.org.uk/about/research-with-impact/>

<sup>39</sup> [https://www.universitiesuk.ac.uk/news/Documents/uuk\\_achieving-stability-higher-education-april-2020.pdf](https://www.universitiesuk.ac.uk/news/Documents/uuk_achieving-stability-higher-education-april-2020.pdf)

developing excellent research, to build a track record of performance, and implement long-term research strategies - see the Wellcome Trust report on QR<sup>40</sup>.

- This is especially true for HEPs with 'pockets of research excellence'. Such institutions do not routinely secure funding from the other part of the dual support system - the research councils. Without QR, we would lose support for innovative research across the full diversity of UK HEPs, and by extension, the full diversity of researchers.
- The HoC Science and Technology Committee endorsed our recommendation<sup>41</sup> to introduce a year on year uplift of QR, via a 'gearing' formula providing at maximum a 10% increase in funding, for institutions with relatively low QR allocations. This would be expressly to support emerging research environments to establish infrastructure and capacity<sup>42</sup>.
- This would address the time lag between assessment exercises combined with the rate of change of smaller universities' research activities that results in their QR allocation quickly becoming out of kilter with their actual circumstances.
- Combined with Nesta's recommendation to regionally weigh QR<sup>43</sup>, this would, in our view, truly help to support excellent research, wherever it is found, at a time when the UK needs a very strong R&D system to support recovery from Covid-19 and longer-term economic, social and cultural growth (current QR distributions are illustrated in Annex B).

## **2. Introduce a Research and Innovation Kickstarter Fund within expanded RED and E3 Funds**

- Many smaller, specialist higher education providers wish to undertake research and formal knowledge exchange but struggle to find the funding and support to do so, despite them being established teaching institutions and even when they are closely aligned to their industries. E3 and RED both show promise in that regard but have a very high barrier to entry at present<sup>44</sup>.
- For example, providers such as the University College for Estate Management (UCEM) have unique teaching approaches developed and led by industry experts and are extremely well connected to the construction industry more widely and have a strong willingness and eagerness to undertake research.
- However, nothing within the current R&D system allows them to establish their research expertise that the 2.4% target requires, not least due to the time between QR funding cycles. This includes the development or research capacity, capability and systems.
- There is an urgent need to unleash close to the market research potential. We suggest a pilot Research and Innovation Kickstarter fund is established to award grants between REF cycles. It should form a ring-fenced part of existing enabling funds such as expanded RED or E3 funds.

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<sup>40</sup> Wellcome Trust, Empowering UK universities: how strategic institutional support helps research thrive, 2018: <https://wellcome.ac.uk/sites/default/files/empowering-uk-universities-how-strategic-institutional-support-helps-research-thrive.pdf>

<sup>41</sup> Further evidence in our full submission is at <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/science-and-technology-committee/balance-and-effectiveness-of-research-and-innovation-spending/written/90503.html>

<sup>42</sup> <https://www.parliament.uk/business/committees/committees-a-z/commons-select/science-and-technology-committee/news-parliament-2017/balance-research-innovation-spending-report-published-17-19/>

<sup>43</sup> <https://www.nesta.org.uk/report/the-missing-4-billion/>. See Recommendation 9, p.67

<sup>44</sup> RED and E3 funds require a level of matched funding that smaller institutions are less likely to be able to find, purely due to their scale of operation. This makes them less able to reach the scale which successful bids tend to have. Therefore another route to being involved in RED and E3 is needed.

- This fund should complement our QR proposal in that it funds promising institutions that are not already funded through QR but plan to enter the next REF.
- Fund recipients (in England) should be on the Office for Students register (as Approved Fee Cap providers) and be partnered with existing research institutions to gain a greater understanding of the R&D landscape (partner institutions should also be rewarded for their efforts)<sup>45</sup>. Organisations such as GuildHE Research could help broker relationships.

### 3. Expand the eligible recipients for specialist institutions beyond its narrow definition and increase funding to £50m per year

- The current definition only supports a very limited number of institutions with little transparency or rationale other than for historic reasons.
- This fund could be expanded to support locally/regionally significant institutions as well as globally significant. This could be based on demonstrable, emerging research strengths as evidenced by participation in the Research Excellence Framework.
- The March budget signalled government's commitment to specialist institutions. Now is the time to go further and increase funding to £50m per year. A wider definition of specialist would allow a higher number of regional specialists in poorer parts of the country such as Cornwall and smaller northern towns to drive their industries and local economies through providing practical, applicable research in a way that they have not been able to previously. Combined with HEIF allocations and UKSPF, this would be truly transformational for parts of the UK.

### Work with the further & higher education sectors to address climate challenges

- The [Climate Commission for UK Higher and Further Education Students & Leaders](#) has identified five areas that the sector needs focused support on to ensure there is a clear and feasible pathway to reach targets. These are:
  - Mobilising the Further and Higher Education voice for influence and impact
  - Research and innovation– the funding and scope of research and innovation and maximising its impact
  - Measuring and Reporting - Scope 1, 2 & 3 – profiling work underway, developing sector understanding of Scope 3 emissions, and supporting the sector to make significant progress in addressing these emissions
  - Deep adaptation – including governance, risk, mitigation and adaptation for the future of our campuses and operations
  - Education and the student experience – curriculum development and the climate emergency.
- There will be cost implications of supporting institutions' move towards carbon neutrality by 2030 and embed the UN's SDGs across all their activities and there should be an **investment fund to support institutions to become more sustainable**.

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<sup>45</sup> Partnering new and emerging research organisations with those that have demonstrated their excellence through REF would have a dual benefit of ensuring quality of research and providing useful collaborative experience amongst comparative institutions.

## 5. Strengthening the UK's place in the world

### 1. Introduce stabilisation funding to ensure UK institutions maximise their export potential

- As the UK has left the EU there will be a shortfall in funding for international research collaboration provided through Horizon 2020 and its successor Horizon Europe and for mobility and education through Erasmus+.
- This will be compounded for higher education providers by losses realised as a result of the Covid-19 pandemic - for example, through reduced numbers of international students, conference income and other catering income and previous and possible future accommodation rebates.
- These effects will be felt by the full diversity of higher education providers across the whole of the UK and will severely affect the capacity of the UK higher education and research and innovation system to strengthen the UK's place in the world without action being taken.<sup>46</sup>
- We welcome the measures already outlined by government as part of the university sustainability package as a step in the right direction.
- Further to this, in the early years of this next spending period, it is essential that uplifts to the research and development budget are sufficient to fully cover EU funding and to address sector wider sustainability. Money already committed through uplifts to the central QR, for example, will not cover this.
- We also strongly support the desire to associate to Horizon Europe. However, association must not come at the expense of the QR budget. That would compromise government levelling up and science superpower targets (see our responses to these sections for further information).

### 2. Introduce the UK Shared Prosperity Fund, ensuring it at least equals the amount of money received through previous EU structural development funding by investing in capacity and capability throughout all sectors of the economy and all regions and nations of the UK

- UKSPF offers a real opportunity for the government to build strong foundations throughout the UK that will enable all sectors of society and the economy to strengthen the UK's place in the world. Getting it right will help channel inward investment into many parts of the UK.
- ERDF programmes were also successful in creating local cross-sector collaborations to entice overseas investment into regions and in growing existing research in poorer parts of the UK. A UK successor, such as UKSPF, is essential in order to build up and develop capacity in all parts of the UK so that international projects can be undertaken.
- Universities are central to these projects<sup>47</sup> and as a result of such funding, small and specialist universities lead the way in local innovation to solve local problems.
  - Bishop Grosseteste University in Lincoln received European Structural Funding to enable them to work with SMEs in otherwise hard to reach subregions of the UK.

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<https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/achieving-stability-UK-higher-education-following-COVID-19-april-2020.aspx>

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[http://www.millionplus.ac.uk/documents/MillionPlus\\_Policy\\_Briefing\\_-\\_How\\_the\\_Shared\\_Prosperty\\_Fund\\_can\\_protect\\_the\\_UK\\_economy.pdf](http://www.millionplus.ac.uk/documents/MillionPlus_Policy_Briefing_-_How_the_Shared_Prosperty_Fund_can_protect_the_UK_economy.pdf)



- A researcher at Falmouth University has undertaken work to increase sustainable yields by redesigning lobster pots with an SME company and the National Lobster Hatchery in Padstow, demonstrating the cross-regional and cross-sectoral linkages a smaller university can make to fulfil a local challenge. This has the potential for scale-up nationally and to the international multi-billion dollar lobster industry.
- Harper Adams University is the only major employer in its part of Shropshire and is world-leading in terms of its research. The university tackles local skills challenges: many of their students come from the local farming community and then return to work in agriculture. The University is also supporting local business development through the AGRI ERDF funded project. UKSPF would boost their local, regional and international socio-economic contributions.
- We echo the Creative Industries Federation’s comment that “The replacement of European Structural and Investment Funds (ESIF) with UKSPF offers the opportunity to redesign investment and business support to better accommodate the sector’s needs, catalysing the growth of strong regional creative clusters across all regions of the country.”<sup>48</sup>
- We add that universities and other HEPs should be part of the core infrastructure for levelling-up prosperity and driving overseas investment by allocating funding directly to them for these purposes.

### 3. Invest in collaborations and networks through at least maintaining current levels of GCRF

- We support the direction travel outlined in the BEIS/UUKi Future International Partnerships paper and emphasise that any schemes introduced must be open to the full diversity of the sector in order to drive growth and prosperity across the ecosystem and country.
- UK institutions need incentivising to work collectively otherwise projects will remain in one part of the system. Horizon 2020 was successful in encouraging larger UK institutions to work with smaller UK universities in order to develop global projects. This learning should be taken into account when developing UK schemes.
- Particularly in light of industrial and global challenges, ideas can come from unexpected angles - for example, arts and design thinking could be applied to a health and sanitation challenge (see the Waterspoutt project: [www.waterspoutt.eu](http://www.waterspoutt.eu)). Connections between disparate disciplines are not easily achieved, either by a single or even the same type of HEP (research-intensive, mid-sized civic university, small generalist or specialist institution).
- Investing in the capacity of existing networks and enabling them to connect with others is necessary to form effective and productive partnerships, whether for research or teaching.
  - a. For example, we are exploring partnerships with the Association for Commonwealth Universities around matchmaking smaller specialist UK universities with universities overseas who have shared research objectives or similar challenges (for example, connecting rural universities in India and the UK to address global agricultural challenges).
- **Continuing the Global Challenges Research Fund** is one way to do this. GCRF should expand to include **further targeted funding and support that explicitly includes and encourages specialist/specialist collaboration**, whether that is for teaching, research or KE projects, including international exchanges between specialist doctoral students, would enable greater UK-led education and innovation, ultimately strengthening the UK’s place in the world.

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<sup>48</sup> CIF CSR Submission 2020

## 6. Improving the management and delivery of our commitments, ensuring that all departments have the appropriate structures and processes in place to deliver their outcomes and commitments on time and within budget

### 1. Maintain regular engagement with stakeholders

- The Covid-19 Pandemic has resulted in greater engagement with stakeholders by ministers, departments and arms length bodies. This has been beneficial because it has led to greater understanding of issues, challenges and opportunities on all sides.
- This engagement needs to happen early in the policy making and delivery process and be maintained. This will better inform evidence-led policy making to address the UK's wider social, cultural and economic challenges.
- We will commit to regularly hosting fora for government ministers and officials to engage directly with specialist and smaller universities and colleges across the UK.

### 2. Encourage greater government cross-departmental working and collaboration including with devolved administrations and regions

- It is essential that greater departmental working is encouraged because the current system duplicates effort and results in wasted time and inefficiencies.
- Universities, for example, respond to two main departments: DfE & BEIS. However, many universities, and specialist institutions in particular, need to work with other departments such as DCMS, DEFRA, DHSC, FCDO, MHCLG in order to ensure that the skills and research systems for key sectors of the economy are best supported.
- Policy generated by one department is frequently not known about by another department or ignores other sectors. For example, the Civil Society Strategy, developed by the Office for Civil Society in DCMS, makes extensive references to supporting young people and yet it fails to take account of the numerous benefits and opportunities that higher education can and does deliver.<sup>49</sup> This lack of coordination seriously risks undermining the UK's long term social, cultural and economic recovery and growth.
- The model of the Cities and Local Growth Unit being a joint unit between BEIS and MHCLG is useful as it pulls together some of the key policies; however, not all parts of BEIS (for example, the team working on European Research and Innovation funding) link visibly back into that team, meaning that the role that innovation plays in growth nationally as well as internationally risks being lost.
- Similarly, we welcome the view in the BEIS Roadmap that all government research funding should be channelled through one route rather than each government department having its own spend without being part of a wider strategy.
- Regular cross-departmental information sharing at ministerial and official levels should become the norm to ensure that inefficiencies are reduced and opportunities maximised.
- The same principles apply for working with regional governments and devolved nations. We await the publication of the devolution white paper with interest.
- We also suggest that there should be a **major reform of the Student Loans Company**.
  - Currently, providers are paid in three installments: 25%, 25% and 50% in the final term. Not all institutions work on a three term basis and this payment profile acts against innovation. Smaller

<sup>49</sup> <https://guildhe.ac.uk/its-time-to-crack-the-echo-chamber/>

providers usually have far lower reserves (and are often cash poor): holding 50% of the payment back until near the end of the year often causes problems in their budgeting.

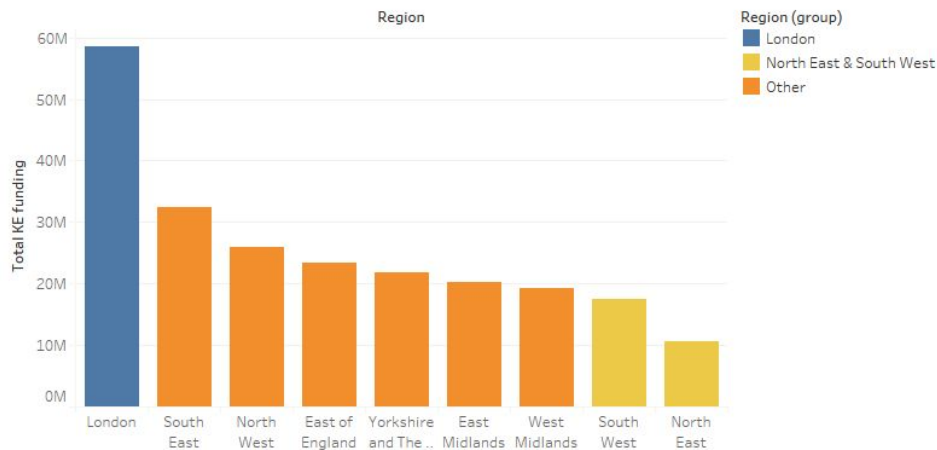
- We recommend that a credit based funding system be implemented so that it enables more innovation and flexible delivery of higher education courses, helping the government to realise its targets for citizens greater engagement with level 4-5 qualifications.

### **3. Value people by encouraging and inspiring civil servants to develop expertise and careers within their departments rather than having to move to progress**

- It is challenging to establish relationships with government departments due to civil servants being encouraged to change policy areas and departments frequently. This results in duplication of effort in explaining policy challenges and opportunities every few months and prohibits the development of solid expertise.
- Time-limited external and inter-departmental secondments that include regularly checking in with their home department could be increased to gain a greater understanding of different government departments and spot synergies. But secondees must be encouraged to deploy this knowledge so that departments can work together.

# Annex A - Analysis of the Higher Education Innovation Fund (HEIF) 2020/21 allocations

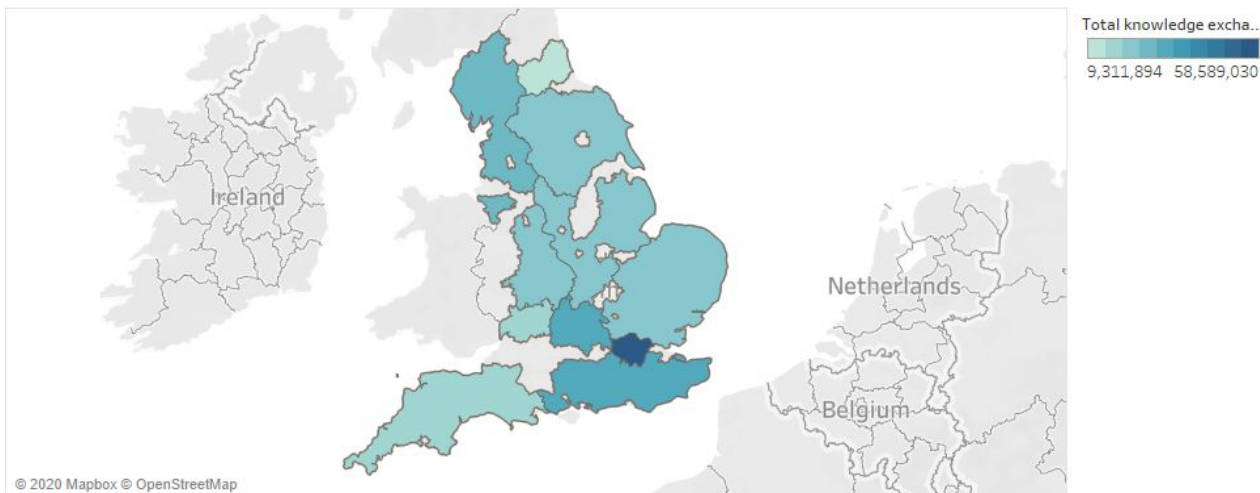
Knowledge Exchange Funding by Region 2020-21



Sum of Total KE funding for each Region. Color shows details about Region (group).

This graph gives an overview of how Knowledge Exchange Funding was distributed across UK Regions for 2020-21. The highest proportion was allotted to London and South East respectively. In comparison, South West and North East received a small proportion of the total HEIF funding.

Regional Knowledge Exchange Distribution 2020-21

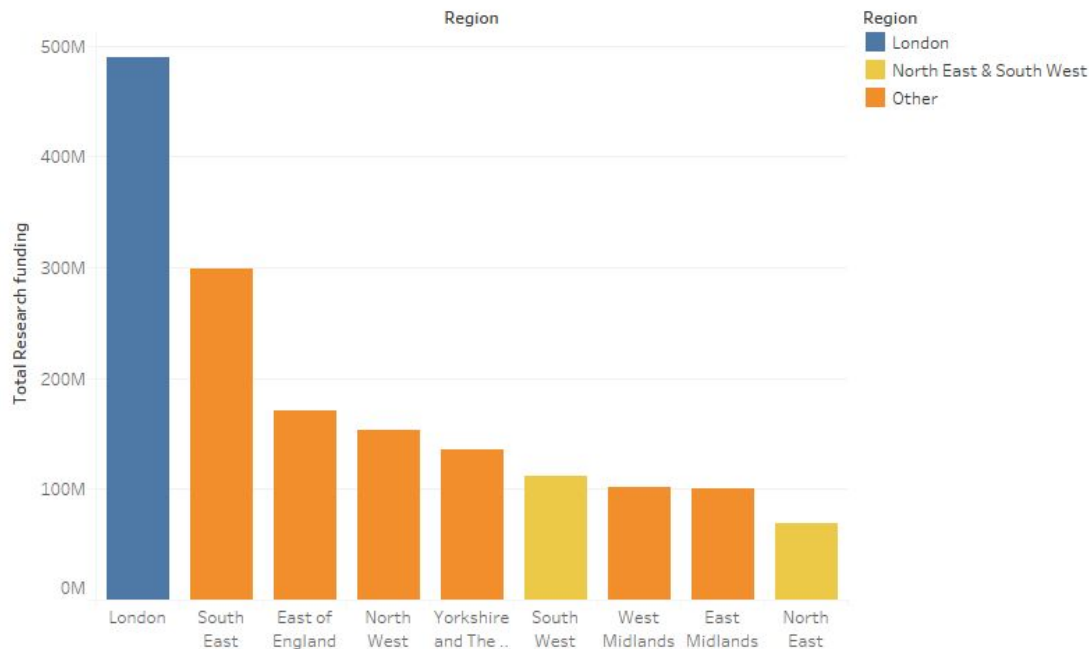


The darkest shade of blue represents London, the region of England with the highest HEIF. Followed by South East, North West, East of England, Yorkshire and The Humber, East Midlands, West Midlands, South West and North East. Only counties receiving HEIF within the aforementioned regions are highlighted.

## Annex B - Regional distribution of QR Funding (England only)

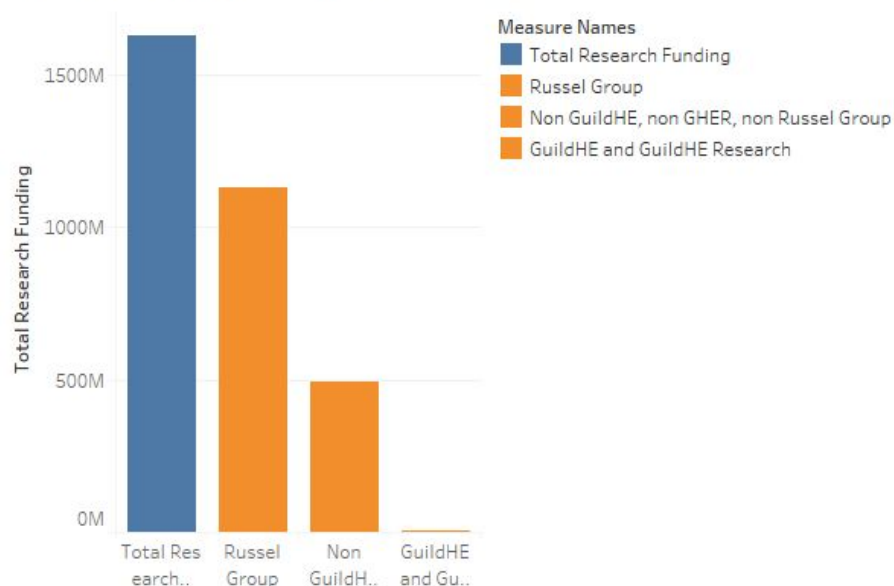
Regional distribution of research funding is similar to that of knowledge exchange funding. However, South West receives a higher relative proportion of research funding as compared to West Midlands, East Midlands and North East.

Research Funding by Region 2020-21



Sum of Total Research funding for each Region. Color shows details about Region (group) 1.

Research Funding for Higher Education Groups 2020-21



Total Research Funding, Russel Group, Non GuildHE, non GHER, non Russel Group and GuildHE and GuildHE Research.

Furthermore, the biggest proportion of research funding was allotted to Russell Group members, with 31.5% of the total research grants going to University College London, Oxford University, University of Cambridge and Imperial College London in the SouthEast and London region.

In comparison, GuildHE and GuildHE Research institutions received a very small portion of QR funding, with a majority of members located in rural, coastal and poorer parts of the country.

It is to be noted here that as the institutional distribution of Global Challenges Research Fund has not been announced yet, these figures do not represent the final distribution for 2020-21.