

The Rt Hon Robert Halfon MP
Minister for Skills, Apprenticeships and Higher Education
Sanctuary Buildings
20 Great Smith Street
Westminster London
SW1P 3BT

By email only to: halfon4harlow@roberthalfon.com

26 September 2023

Dear Minister,

Thank you for your letter on 16 August 2023, which was responding to my letter to Gillian Keegan on 19 July 2023 regarding changes to universities.

I would like to address a specific point made in your response in relation to the Office for Students' approach to benchmarking and free school meals (FSM). I believe your letter was inaccurate and does not reflect the framework which importantly informs TEF outcomes which are released this week.

In the letter you wrote: "I understand that, for the current, ongoing TEF process, eligibility for free school meals is included as part of the benchmarking for student outcomes indicators, one of the metrics which the TEF panel considers. This was not the case for the previous TEF, to which you are referring, and I hope that this provides you with some reassurance."

This statement in fact provides some cause for concern, given it is inaccurate. The Office for Students' approach to benchmarking was set out when the TEF 2023 data dashboard was published (30 September 2022), [Description of student outcome and experience measures used in OfS regulation: definition of measures and methods used to construct and present them](#) (pp. 61–9).

As is made clear in this document, while split indicators are provided for FSM-eligible and FSM-ineligible students, FSM eligibility is not a benchmarking factor for any indicators.

I strongly believe that this is a significant oversight of the TEF, which does not recognise the challenges and lived experience of many students in higher education. As in my earlier letter, I again point to the [research carried out by London South Bank University and HEPI](#) which shows that universities with a smaller proportion of FSM students are more likely to receive a TEF Gold award and that no institution with more than a third of FSM students enrolled has achieved TEF Gold based on the previous iteration of this exercise.

The non-inclusion of FSM eligibility in benchmarking is significant for Goldsmiths given we have a high proportion of FSM-eligible students and the impact of FSM eligibility on student outcomes as highlighted by this research.

We are proud of our record of providing educational opportunities for FSM-eligible students: we had the fifteenth largest proportion (32.1%) of FSM-eligible entrants in 2020/21 (across UK providers recruiting >200 entrants) (cf. the sector average of 19.3%). This commitment has recently been evidenced by Goldsmiths' top three ranking for Value Added in the Guardian University Guide and recognition in the Civitas report, *Breaking the Care Ceiling*, as being among the top institutions for supporting care-leavers into university.

However, the failure of the OfS to benchmark against FSM eligibility means that we and other institutions are potentially being treated unfairly in a regulatory process like TEF.

The OfS's [access and participation data dashboard](#) suggests that, for approximately one-third of our UG students, our TEF 2023 outcomes indicators may be suppressed by approximately six points (continuation), seven points (completion) and four points (progression), based on the sector-level gaps highlighted by the LSBU/HEPI analysis.

This would appear to be counter to the government's levelling up agenda, and does not recognise that Goldsmiths is a place which is proud to actively support those students who face structural disadvantages in their lives.

I would even suggest that non-inclusion of FSM in TEF benchmarking is fundamentally unfair to this group of students and that this omission is potentially denying opportunity to those who need it the most. With the number of children receiving FSM continuing to rise, with official data from January 2023 showing nearly a quarter now get this support as the cost of living crisis continues to hit families, this issue is regrettably not going to go away.

As Minister for Universities, I urge you to urgently review this situation to ensure that the vital issue of FSM is included to help level the playing field for these students.

I know you are invested in ensuring there is equal access to opportunity, and look forward to hearing any plans about taking this forward. Please do not hesitate to contact me should you wish to discuss this important issue, as I am confident that the experiences of Goldsmiths and those in our community could considerably inform any conversation for the better.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Frances Corner', written in a cursive style.

Professor Frances Corner OBE
Warden