

Witness Name: Hannah Sheehan

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UK COVID-19 INQUIRY

**CORPORATE STATEMENT OF HANNAH SHEEHAN
ON BEHALF OF THE
DEPARTMENT FOR EDUCATION**

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I, HANNAH SHEEHAN, OF THE DEPARTMENT FOR EDUCATION, SANCTUARY BUILDINGS, GREAT SMITH STREET, LONDON, SW1P 3BT, WILL SAY AS FOLLOWS:

1. Introduction

- 1.1. I, Hannah Sheehan, am employed by the Department for Education ("DfE"), as the director responsible for supporting young people and adults to participate in education or training post-16. I took up this post in April 2023. My role during the specified period was as Director, Higher Education COVID-19 Response, being in that role from October 2020 until April 2022, after which I took on a broader role on higher education ("HE").
- 1.2. I make this statement in response to the Covid-19 Inquiry's ("the Inquiry") request for evidence under Rule 9 of the Inquiry Rules 2006 sent on 22 January 2025 ("the Rule 9 request"). This statement addresses questions 1 to 35 in that request.
- 1.3. I have been assisted in preparing this statement by officials in DfE who worked in the relevant areas throughout this period.
- 1.4. DfE officials have searched thoroughly for any available evidence in order to set out what happened, when, and why as fully as possible. Where there are any gaps in evidence about decision making, this is because DfE have not been able to find evidence to fill those gaps.
- 1.5. I am satisfied from the documents found and exhibited in this statement, assurance from current and former DfE officials who worked on this area through the pandemic and my own recollection that this statement sets out the key events that occurred during that period as accurately as possible.
- 1.6. As the Inquiry is already aware from evidence it received in Module 2, the central structures of decision making changed during the course of the pandemic (and the parameters and timeframes for decisions were often set centrally). During the COVID-19 pandemic, the Secretary of State for Education ("SSE") did not have complete autonomy to make decisions. Consequently, this statement will not always give a complete picture of decision-making processes that took place outside the department.
- 1.7. This statement is supported by documentary evidence, which will be referred to in the format (Exhibit HS1/xx - INQ0000).

- 1.8. This statement is predominantly framed around the HE sector and the students within that sector. HE refers to learning at Regulated Qualifications Framework (“RQF”) levels 4 to 8 (Exhibit HS1/001 – INQ000607722). Qualifications covered are at a higher level than A levels or equivalent, and include a range of qualifications, such as foundation degrees, first degrees, master’s degrees, and doctorates.
- 1.9. HE is primarily delivered via universities, as well as other providers registered with the Office for Students (“OfS”) that offer HE programmes or courses to students. There are over 400 regulated higher education providers (“HEPs”) in the system in England delivering provision to around 2.5 million enrolled students in 2022/23. HEPs are institutions offering HE courses, including universities, further education (“FE”) colleges and alternative provision (“AP”), with the full list found on the OfS register listing all providers. Universities account for around 90% of total HE student numbers and vary in size, origin, legal form, mission, entry requirements, subject mix, and student demographics (Exhibits HS1/002 – INQ000607689 and HS1/003 – INQ000607669). Further detail on FE is provided in the Corporate Statement provided by Roger Cotes dated 31 July 2025 (Exhibit HS1/364 – **INQ000588003**).
- 1.10. I would like to record my gratitude to all of the teaching, research and support staff who attended in person throughout the COVID-19 pandemic to enable settings to remain open.

2. The Department for Education’s role and responsibilities in relation to higher education

- 2.1. The Inquiry has asked DfE to set out its responsibilities towards young people in relation to HE, in respect of: wellbeing, attainment, access to education, provision of education, finances and accommodation. In addition, the Inquiry has asked DfE to set out its obligations and responsibilities towards HEPs.
- 2.2. DfE and SSE set strategic priorities for the HE sector in England and are ultimately accountable for English HE in Parliament. HEPs are autonomous, self-governing institutions, responsible for appointing and employing their own staff and setting their own policies and procedures.
- 2.3. The OfS is the regulator for HE in England, established in 2018. It is a non-departmental public body. It maintains a register of regulated HEPs. It is accountable to Parliament and receives guidance on strategic priorities from DfE.

SSE may give directions to the OfS and also make grants to the OfS subject to terms and conditions set by SSE. SSE has ultimate accountability for the OfS in Parliament and the Minister of State for Skills has lead responsibility for oversight of the OfS on a day-to-day basis (during the specified period, this responsibility was held by the Minister of State for Universities). Please see paragraph 2.15 on the Minister of State for Universities (Exhibits HS1/004 –INQ000607690 and HS1/005 – INQ000607691).

2.4. The OfS' powers and duties derive principally from the Higher Education Research Act 2017 ("HERA 2017") (Exhibit HS1/006 –INQ000607723). Section 2(3) of HERA 2017 requires the OfS to have regard to guidance given to it by SSE. HERA enables guidance to be used to set out the government's strategic and policy priorities for HE and how it wishes the OfS to address these (Exhibit HS1/004 – INQ000607690). HERA 2017 requires the OfS to have regard to:

- 2.4.1. the need to protect the institutional autonomy of English HEPs (HERA 2017 also requires SSE to have regard to the need to protect this autonomy).
- 2.4.2. the need to promote quality, and greater choice and opportunities for students, in the provision of HE by English HEPs.
- 2.4.3. the need to encourage competition in provision between English HEPs (where that competition is in the interests of students and employers).
- 2.4.4. the need to promote value for money in the provision of HE by English HEPs.
- 2.4.5. the need to promote equality of opportunity in accessing and participating in HE provided by English HEPs.
- 2.4.6. the need to use the OfS's resources in an efficient, effective and economic way.
- 2.4.7. so far as relevant, the principles of best regulatory practice, being transparent, accountable, proportionate, consistent and targeting regulatory activities only to cases which require action.

2.5. The OfS sets the requirements that registered HEPs must meet for teaching quality, student outcomes, equality of access and participation, and the management, governance and financial sustainability of their institutions. The OfS also monitors the performance of HEPs, publishes data and reports, and takes action if a

registered provider is failing to meet established standards. Where the OfS discovers low quality provision, it can impose a range of sanctions, including financial penalties and, in extreme cases, removing providers from the register (Exhibits HS1/007 –INQ000607692, HS1/008 –INQ000607703and HS1/009 – INQ000607670).

Access, participation, quality, and student wellbeing

2.6. The OfS is operationally responsible for regulating the HE sector in regard to access, participation, quality, and student wellbeing. It has four primary regulatory objectives. All students, from all backgrounds, and with the ability and desire to undertake HE (Exhibit HS1/008 – INQ000607703):

2.6.1. are supported to access, succeed in, and progress from, HE.

2.6.2. receive a high-quality academic experience, and their interests are protected while they study or in the event of provider, campus or course closure.

2.6.3. are able to progress into employment or further study, and their qualifications hold their value over time.

2.6.4. receive value for money.

2.7. Additionally, HEPs are required to have procedures in place for handling student complaints and academic appeals. In the Higher Education Act 2004, DfE established a framework for how students can ask for their complaints to be reviewed (Exhibit HS1/010 – INQ000607724. The Act required HEPs to register with and subscribe to the existing Office of the Independent Adjudicator for Higher Education (“OIA”), designating this independent body, from 2005 onwards, with the remit to review student complaints about HEPs in England and Wales. In the independent student complaints scheme for England and Wales; students can request the OIA to review their complaint if it cannot be resolved through the HEP’s processes.

Accommodation

2.8. Some HEPs provide accommodation for students and some students live in other third-party accommodation. DfE has no role in the provision of student residential accommodation, nor a remit to intervene.

Student funding

2.9. DfE sets maximum fee limits that HEPs can charge for undergraduate courses and maximum loans and grants for living and other costs for undergraduate and postgraduate courses through secondary legislation (Exhibits HS1/011 – INQ000607725).

2.10. The Student Loans Company (“SLC”) is a non-profit making government-owned organisation that administers loans and grants to students in HEPs in the UK. They are an executive non-departmental public body. In financial year 2023/24, SLC issued around £20.1 billion of student loans. DfE is the designated sponsor department having the primary relationship with SLC in relation to matters of corporate governance, acting in defined circumstances on behalf of all UK administrations. DfE also issues SLC’s annual performance and resource agreement on behalf of all four UK administrations.

2.11. The payment of fees for HE forms a contract between students and HEPs, making students consumers protected by consumer law. As autonomous institutions, HEPs are responsible for setting the terms of their student contracts. As the HE regulator, part of the OfS’ role is to ensure that students’ consumer rights are protected, that all students understand what they can expect in terms of teaching and support, and that, if necessary, they have access to a user-friendly complaints process. The OIA also deals with disputes over tuition fees and other financial matters.

2.12. The OfS distributes the Strategic Priorities Grant (“SPG”) to HEPs. The SPG funding amount in England for financial year 2021/22 was £1.4 billion compared to a total HEP income of approximately £46 billion (Exhibit HS1/012 - INQ000607611). HEPs diversify their income through research funding, both from private sources and from government; principally UK Research and Innovation (“UKRI”) (which incorporates Research England and the Research Councils, who make funding decisions independently from the government in accordance with the Haldane principle), tuition fee income from international students, and engaging in commercial activities like consultancy services and intellectual property licensing.

The Department for Education’s role and responsibilities during the specified period

2.13. The Inquiry has asked what responsibilities DfE had towards HEPs prior to and during the specified period. The responsibilities of DfE to the HE sector, as outlined

above, remain unchanged from what they were prior to the COVID-19 pandemic. DfE maintained its established relationship with HEPs throughout the specified period, with HEPs remaining autonomous.

2.14. The COVID-19 pandemic necessitated closer than usual working between DfE and HEPs, with DfE seeking to support HEPs to remain open, reduce the transmission of COVID-19 and care for and protect students, whilst remaining financially viable. DfE did this through more regular discussions with the sector about the impact of COVID-19 and government guidance, as well as facilitating the sharing of best practice. DfE also took more direct action in some areas during the COVID-19 pandemic, for example, with the introduction of a package designed to support HEPs and stabilise the admissions system to prevent aggressive recruitment practices by some HEPs, which was announced on 4 May 2020 as part of the *Government support package for universities and students* (Exhibits HS1/013 - INQ000607661 and HS1/014 - INQ000245884). More detail on the department's work in this area is included in paragraph 5.5 below.

2.15. During the specified period, Michelle Donelan was Minister of State for Universities ("MoSU") from February 2020 and Minister of State for Higher and Further Education from September 2021 to July 2022. She was responsible for the COVID-19 response concerning HEPs.

Agencies, non-departmental public bodies and other government departments that the Department for Education works with regarding HE sector policy

2.16. DfE works with a range of government organisations in relation to HE. These include:

2.16.1. The OfS

2.16.2. The OIA

2.16.3. SLC

2.16.4. UKRI - A non-departmental public body sponsored by the Department for Science, Innovation and Technology ("DSIT"), and the UK's largest public funder of research and innovation (Exhibit HS1/015 -INQ000607693). In 2017, the UKRI was established as a non-departmental public body sponsored by the Department for Business, Energy and Industrial Strategy ("BEIS"). It brought together the seven research councils, Innovate UK, and the research and

knowledge exchange functions of the Higher Education Funding Council for England. UKRI's main purpose was to invest in and facilitate research and innovation activities across the United Kingdom, and, through Research England, directly support HEPs in England to carry out research and knowledge exchange activities (Exhibits HS1/016 – **INQ000330515** and HS1/017 - INQ000607737).

- 2.16.5. Department for Business and Trade - ensures that HEPs provide the skills needed by businesses. This includes aligning educational programmes with industry needs and promoting apprenticeships and vocational training, and innovation in the HE sector.
- 2.16.6. DSIT - supports research initiatives in universities through the seven research councils, Research England and Innovate UK that are part of UKRI. DSIT also funds the £80 billion Horizon Europe Programme that promotes participation in international research, as well as sponsoring research and development through the Advanced Research and Innovation Agency. The DfE provides funding to support research in the HE sector through block grants that are calculated using the Research Excellence Framework. At the time of the COVID-19 pandemic, BEIS held responsibility for science and research. These responsibilities moved to DSIT when it was formed in 2023.
- 2.16.7. Department of Health & Social Care ("DHSC") - collaborates to ensure that the educational dependencies align with the aspirations for training future healthcare professionals. This includes support with the DHSC led development of programmes for nursing, medicine, and allied health professions, whilst confirming that these programs meet the needs of the healthcare sector.
- 2.16.8. Home Office ("HO") - manages policies related to international students, including visa regulations and compliance. This ensures that the UK remains an attractive destination for international students while maintaining immigration controls.
- 2.16.9. Ministry of Housing, Communities and Local Government ("MHCLG") - works with DfE to develop policies to support students in finding adequate and affordable student housing. This includes supporting DfE in understanding planning barriers, housing quality and affordability issues.

2.16.10. Number 10 (“No.10”) & Cabinet Office (“CO”) - ensure that education policies align with the government's overall strategy and priorities.

2.16.11. Devolved administrations (“DAs”) - the separate governments established for Scotland, Wales, and Northern Ireland.

Organisations that the Department for Education works with on higher education

2.17. DfE works closely with a number of stakeholders in the HE landscape, including:

2.17.1. Universities UK (“UUK”) – a membership and advocacy organisation for 141 universities in England, Scotland, Wales and Northern Ireland (Exhibit HS1/018 –INQ000607698).

2.17.2. Independent Higher Education – the UK membership organisation and national representative body for independent providers of HE, professional training and pathways (Exhibit HS1/019 –INQ000607699).

2.17.3. Million Plus – the association for modern universities in the UK; championing, promoting and raising awareness of the role of modern universities (Exhibit HS1/020 –INQ000607700).

2.17.4. University Alliance – represents 16 leading professional and technical universities. UA's members specialise in working with industry and employers (Exhibit HS1/021 –INQ000607701).

2.17.5. Russell Group – represents 24 research-intensive universities located in every region and nation of the UK (Exhibit HS1/022 –INQ000607704).

2.17.6. Guild HE - represents HEPs, especially those with a tradition of learning, research and innovation in industries and professions (Exhibit HS1/023 – INQ000607702).

2.17.7. Universities and Colleges Employers Association – a membership body for HEPs, focussing on employment and reward matters in the UK HE sector (Exhibit HS1/024 –INQ000607696).

2.17.8. Universities and Colleges Admissions Service (“UCAS”) – an independent charity and the UK's admissions service for HE (Exhibit HS1/025 – INQ000607697).

2.17.9. National Union of Students (“NUS”) – a trade union representing university and college students across the UK (Exhibit HS1/026 –INQ000607694).

2.17.10. University and College Union (“UCU”) – a trade union representing over 120,000 academics, lecturers, trainers, instructors, researchers, managers, administrators, computer staff, librarians, technicians, professional staff and postgraduates in universities, colleges, prisons, adult education and training organisations across the UK (Exhibit HS1/027 –INQ000607695).

3. Pre-pandemic planning

3.1. As set out within the second Corporate Statement provided by Susan Acland-Hood dated 12 June 2025 (Exhibit HS1/365 – INQ000587823), prior to the COVID-19 pandemic, government preparation in this area mainly focused on health impacts and flu pandemic planning. Education and childcare measures were aimed at keeping schools open despite staff illness or deciding short term school closures locally.

3.2. This section covers DfE’s pre-pandemic exercises and emergencies that included HEPs which were led by DHSC (as the lead government department) along with CO. Further detail on these exercises is provided in the second Corporate Statement provided by Susan Acland-Hood dated 12 June 2025 (Exhibit HS1/365 - INQ000587823).

UK Influenza Pandemic Preparedness Strategy (November 2011)

3.3. As explained in Susan Acland-Hood’s statement, in November 2011 the Department for Health (“DH”) published *The UK Influenza Pandemic Preparedness Strategy* (Exhibit HS1/028 – INQ000022708) which outlined the government’s strategic approach for responding to an influenza pandemic, including information and guidance to the public and private organisations developing response plans. At the time (November 2011), the Department for Business, Innovation and Skills (“BIS”) had responsibility for HE.

3.4. In terms of education settings, the strategy had a large focus on localised school closures and the potential benefit of this in protecting individual children from infection and in reducing overall transmission of the virus. However, as part of the business continuity arrangements it was noted that universities and colleges “*have their own business continuity plans and will make their own decisions on closures or*

partial closures based on advice from public health services. The Department for Business, Innovation and Skills (BIS) will provide advice and guidance to the sector bodies (Universities UK, the Association of Colleges, the National Union of Students and the Higher Education Business Continuity Network) as the pandemic develops to enable them to make locally based decisions and to communicate effectively with their staff and students.” Higher and further education, apprenticeships and skills policy was transferred from BIS to DfE in June 2016 (Exhibit HS1/029 – INQ000607390).

Exercise Cygnus (October 2016)

- 3.5. Exercise Cygnus (Exhibit HS1/030 - INQ000056232) was a cross-government exercise to test preparedness for the event of a serious influenza pandemic and was set in week seven of the UK’s response to a pandemic.
- 3.6. As explained in Susan Acland-Hood’s statement, representatives from various government departments and public health institutions participated in Exercise Cygnus. The report was completed by Public Health England (“PHE”) on behalf of DH. Exercise Cygnus identified four key learning outcomes, none of which specifically related to HE. However, one recommendation advised that *“the introduction of legislative easements and regulatory changes to assist with the implementation of the response to a worst-case scenario pandemic should be considered”*. This recommendation led into the Pandemic Influenza Bill (2018) that gave SSE the powers to close education settings in the event of a pandemic. Further information about the Pandemic Influenza Bill and the consideration given to HE as it was developed can be found in paragraph 3.9.

DfE review of emergency response (2017)

- 3.7. In May 2017 DfE’s Management Committee commissioned a review of the Core Emergency Response Group function. The aim of the review was to incorporate lessons learned from recent departmental responses and to examine whether the department had the necessary capacity and capability to deal with any potential emergencies. The review also aimed to look beyond the immediate response and consider the long-term recovery issues and secondary impacts major incidents have on the education sector. The findings were informed by the lessons learned from recent incidents, survey reviews of emergency plans in schools, best practice provided by other government departments (“OGDs”) and contributions from

relevant DfE policy colleagues, benchmarked against CO's best practice. The findings were presented to DfE's Management Committee, which was made up of DfE's Directors General ("DGs") and the Permanent Secretary (Exhibit HS1/031 – INQ000514459).

- 3.8. Of the six key findings, one related to HE: *"FE and HE incidents were not integrated into DfE's wider response mechanism"*. Of the 13 recommendations that were made, the Management Committee requested five of them be prioritised, one of which was that *"The committee felt further distinction to handling the HE and FE sector was required."* DfE officials have not been able to find specific evidence of follow up in relation to this recommendation, but FE and HE were fully embedded in the department's COVID-19 response from the beginning.

Pandemic Influenza Bill (2018)

- 3.9. In 2018 the CO's Civil Contingencies Secretariat ("CCS") and DHSC led on the development of measures for a Pandemic Influenza Bill (Exhibit HS1/032 - INQ000097540). This draft legislation was to be used in the event of a future influenza pandemic and set out the legislative easements required to support local and national response activities, as recommended in one of the four key learnings from Exercise Cygnus. DfE's Emergency Response Group ("ERG") was responsible for managing the department's approach in developing legislation that would give SSE the power to close educational establishments in the event of a pandemic. A submission was sent to SSE in April 2018 to prepare draft legislation for DfE to enforce school closures should the need arise (Exhibit HS1/033 - INQ000514464). Further clarity on the scope and breadth of the powers would be provided in legal instructions.
- 3.10. In May 2018 DfE officials considered the closure powers that DfE could have over HEPs and concluded that (Exhibit HS1/034 -INQ000607391):
- 3.10.1. HE would be more complex than schools due to their multiple sites and the age group of the students (18+ years, therefore young adults not children).
- 3.10.2. the existing legislation did not include any authority that would allow the government to require shutdown.

3.10.3. the OfS determine, publish and apply conditions for HEPs and would need confirmation that education setting closures would be consistent with their powers.

3.10.4. it could eliminate HEPs' autonomy to make decisions around closures and further consultation with the sector was required.

3.11. Although it was concluded that HEPs would not form part of the draft Pandemic Influenza Bill at that point (Exhibits HS1/035 –INQ000607392, HS1/036 – INQ000607393 and HS1/037 -INQ000607394), the work that had been completed across the department in relation to this Bill was essential in forming the basis of the Coronavirus Act 2020 (Exhibit HS1/038 - INQ000352999).

Emergency planning within DfE

3.12. As acknowledged above and in the second Corporate Statement provided by Susan Acland-Hood dated 12 June 2025 (Exhibit HS1/365 – INQ000587823), pre-pandemic planning and exercises were focused more on schools than other education settings. Since the COVID-19 pandemic, DfE has strengthened its internal capacity within the department by establishing a Resilience Directorate, including a Rapid Response and Emergency Planning Division that focuses on risk reduction and emergency preparedness. Some of the work undertaken by DfE that supports HE includes strengthening coordination across the examinations and HE admissions systems through frequent meetings between DfE ministers, senior officials and the Chief Executive at UCAS, and between DfE, Office of Qualifications and Examinations Regulation ("Ofqual"), UCAS, UUK and OfS. DfE, Ofqual and UCAS jointly facilitate resilience work across the examinations and HE admissions system as a whole, bringing in exam boards, UUK and OfS. Further detail about the work of Resilience Directorate is provided in the second Corporate Statement provided by Susan Acland-Hood dated 12 June 2025 (Exhibit HS1/365 – INQ000587823).

4. Initial response to the pandemic (January 2020 to March 2020) and the announcement of the first national lockdown

4.1. The Inquiry has asked DfE to set out its initial response to the COVID-19 pandemic relating to HE. This chapter sets out the actions which took place from January 2020 to March 2020, including the announcement of the first national lockdown.

4.2. In addition, the Inquiry has asked when DfE first considered restricting attendance at HEPs and the planning which took place to prepare for this. During January 2020 to March 2020, HEPs were not expected to close. This is covered within the second Corporate Statement provided by Susan Acland-Hood dated 12 June 2025 (Exhibit HS1/365 –INQ000587823):

“The initial pandemic response for HE was dealt with somewhat differently because HEPs are autonomous institutions delivering provision to adult learners and they operate under a different statutory framework. HEPs made their own decisions about how to respond, but sector information was issued which noted how providers were shifting to online teaching and learning, encouraging students and staff to adhere to public health advice and changing exam arrangements.

HEPs were not expected to close fully. This was due to infrastructure requirements, commitments to groups of students living on campus who were unable to go anywhere else, and the need to continue essential research (including COVID research).”

4.3. During the period January 2020 to March 2020, DfE’s work on COVID-19 in relation to HE involved: monitoring what was happening abroad in relation to international students and campuses, meeting and discussing relevant issues with HEPs, and supporting the HE sector through guidance on preventing the spread of COVID-19.

January 2020

4.4. By 22 January 2020, DfE had already engaged with OGDs on what was happening internationally in relation to COVID-19, specifically regarding Chinese HE students returning to the UK and UK overseas campuses in China, as well as other international HE students. DfE officials had been in touch with DHSC and the HO student visa team on the large number of Chinese citizens who attended HEPs in the UK. At that point, international students were DfE’s main focus regarding HE (Exhibits HS1/040 –INQ000607397 and HS1/041 –INQ000607398).

4.5. Situation reports (“sitreps”) 1 and 2 from 24 January 2020 set out that initial response work in DfE had focussed on HEPs (Exhibit HS1/042 – INQ000542403) and at that time, PHE were coordinating the messaging to groups including HEPs (Exhibit HS1/043 – INQ000542406). In addition, on 24 January 2020 the then current PHE guidance on travel was signposted to HEPs by DfE, via the OfS and UUK (Exhibit HS1/044 –INQ000607399).

4.6. On 31 January 2020, DfE officials joined a meeting with PHE and HEPs to discuss concerns around COVID-19. HEPs were worried about insufficient accommodation for students needing to self-isolate, being unaware whether students were being tested for COVID-19, and the changes to travel guidance around China (Exhibit HS1/045 –INQ000607400). In response, DfE officials, along with PHE, spoke with the MCHLG to make sure they were aware of the lack of accommodation. DfE also, via the OfS and UUK, provided further PHE guidance on self-isolation to HEPs, and PHE provided further guidance on travel to China. In addition, DfE officials spoke to the OfS and UUK to understand the scale of hostility towards Chinese students being reported. DfE encouraged UUK and the OfS to set out expectations to HEPs and refer to HEPs' obligations around equality and tackling harassment. At this time, to ensure consistency in messaging, DfE officials worked closely with DHSC and PHE on tailoring the communications to the HE sector (Exhibits HS1/046 – INQ000607401 and HS1/047 –INQ000607402).

February 2020

4.7. On 4 February 2020, DfE sent DHSC guidance on self-isolation and PHE posters to be displayed in public places to the OfS and UUK, who disseminated these to HEPs. This was followed by further updates to guidance on posters and leaflets being sent by PHE to be issued by UUK on 10 February 2020 (Exhibits HS1/048 – INQ000542428 and HS1/049 -INQ000607706).

4.8. On 5 February 2020, the first working draft of DfE's reasonable worst-case scenario, *Emergency Response Plan Coronavirus*, was circulated by DfE ERG (Exhibits HS1/050 - INQ000542410 and HS1/051 - INQ000542409) to relevant DfE officials. The plan set out DfE's emergency response to the COVID-19 outbreak, including planning assumptions and actions for DfE-led education and childcare sectors which might be impacted, including HE. In the scenario described, based on the global spread of infection, DfE actions included: increased communications with education settings, including HEPs, coordinated with DHSC and MHCLG; robust monitoring of infection within education settings and responding to queries from those settings; taking advice from the CCS on the closure of educational settings if infection rates escalated; and implementing the Pandemic Influenza (Emergency) Bill in the case of a pandemic. Further information on this is covered within the first Corporate Statement provided by Julia Kinniburgh dated 28 July 2025 (Exhibit HS1/366 – INQ000651498

- 4.9. On 17 February 2020, DfE issued guidance, *COVID-19: guidance for educational settings*, to support education settings, including HEPs, which DfE and PHE officials had worked on together (Exhibit HS1/052 - INQ000519708). The guidance provided advice on preventing the spread of infections and what actions to take if there was a suspected or confirmed COVID-19 case in a setting.
- 4.10. Also on 17 February 2020, DfE and PHE jointly published *Coronavirus: travel guidance for educational settings*, advice for educational settings and their students and staff, who were travelling or planning to travel during the COVID-19 outbreak. This included advice for students over 18 as well as specifically those on Erasmus+ exchanges (opportunities for students studying at HEPs to study or work in another European country) (Exhibit HS1/053 –INQ000607672). The guidance advised any UK student or member of staff to consult the latest travel advice before travelling overseas, with those UK students and staff already studying or working overseas to continue to monitor travel advice and contact their HEP for local restrictions and assistance available. For Erasmus+ exchanges, the advice was to contact the education provider to discuss returning ahead of schedule if the student wished to, as well as to follow the local advice and restrictions in place.
- 4.11. On 19 February 2020, DfE officials considered what powers, if any, might need to be taken for or apply to the HE sector to support the response to COVID-19 (Exhibit HS1/054 –INQ000607403). In February 2020, the government had begun to prepare possible emergency legislation in response to the COVID-19 crisis, under the leadership of DHSC (this would in due course lead to the Coronavirus Act 2020). DfE officials considered the impact of taking a power to close HE settings, including the potential consequential impact on the closure of student accommodation and the resultant travel arrangements for domestic and international students (Exhibits HS1/055 – INQ000607408, HS1/056 – INQ000540778 and HS1/057 –INQ000607410).
- 4.12. At a meeting on 25 February 2020, the Scientific Advisory Group for Emergencies (“SAGE”) discussed a paper by Imperial College, *Potential effect of non-pharmaceutical interventions (NPIs) on a Covid-19 epidemic in the UK, 25 February 2020*. The paper modelled four non-pharmaceutical interventions (“NPIs”): HEP and school closures, home isolation, household quarantine and social distancing, including use of interventions in combination (Exhibit HS1/058 - INQ000075787). Assumptions in the modelling included complete closure of schools and 75% of HEPs (25% remaining open). SAGE 10 conclusions included that “*All measures*

required implementation for a significant duration in order to be effective” (Exhibit HS1/059 - INQ000087503). Minutes of the meeting were shared with DfE officials (Exhibit HS1/060 -INQ000607405).

4.13. On 27 February, SAGE discussed the paper *Potential effect of non-pharmaceutical interventions (NPIs) on a Covid-19 epidemic in the UK 26 February 2020*, which posited that the peak incidence would be greatly lowered (around 30%) if all HEPs were closed as well as schools (a shift from 75% closure in the previous paper referenced in paragraph 4.12) (Exhibits HS1/061 - INQ000106129 and HS1/062 - INQ000087326). Minutes from this SAGE meeting were shared with DfE officials.

4.14. Also on 27 February, the Permanent Secretary and DfE DGs held an all-day discussion with the impact of COVID-19 on the education sector on the agenda. One issue raised was the need for consistent arrangements across the HE sector, specifically on the role of HEPs and local authorities where students were unable to travel home. The potential impacts on international students and financial sustainability were also raised (Exhibit HS1/063 –INQ000607407).

March 2020

4.15. This subsection outlines actions taken by DfE during March 2020 to support HEPs to manage the impact of COVID-19, prior to the national lockdown on 23 March 2020.

4.16. On 2 March 2020, DfE launched the DfE Coronavirus national helpline to provide guidance on education-related questions, operating Monday to Friday, from 8 am to 6 pm (Exhibit HS1/064 – INQ000542914). This provided consistency and accuracy in the information given to students, parents and education providers, including HEPs. UUK and OfS were also providing regular updates to HEPs, via newsletters and websites, and HEPs with international ties were in regular conversations with PHE to address specific issues, such as supporting students living in shared accommodation who needed to self-isolate (Exhibits HS1/065 –INQ000607417, HS1/066 –INQ000607742, HS1/067 - INQ000607743and HS1/068 - INQ000641610).

4.17. DfE continued to publish guidance for the HE sector. On 8 March 2020, in response to the lockdown in Italy and a UK student contracting COVID-19 at the University of Oxford that day, DfE discussed the need for joint DfE and PHE guidance for students abroad or about to study abroad, as well as providing advice

to international students on travel and self-isolation (Exhibit HS1/069 – INQ000607424). On 12 March 2020, DfE published new travel guidance, *COVID-19: travel guidance for the education sector*, on GOV.UK, as an update to the guidance *Coronavirus (COVID-19): guidance for educational settings* published on 17 February 2020 (see paragraph 4.9) (Exhibits HS1/070 – INQ000519732). This provided advice to students considering travelling overseas for placements, to students already studying and working overseas, and on travel insurance.

4.18. DfE was also in touch with the HE sector via a 'Task and Finish' group established by UUK, made up of representatives from sector bodies and professional associations. DfE, alongside the HO and UK Visas and Immigration, were members and attended the inaugural meeting on 6 March 2020. The group discussed institutional planning and preparedness, including how possible restrictions could impact HEPs' ability to continue business-as-usual activity (Exhibits HS1/071 – INQ000607426 and HS1/072 – INQ000607428). SSE met with UUK on the morning of 16 March 2020 to discuss the impact of COVID-19 on the HE sector (Exhibit HS1/073 – INQ000607439). MoSU also attended a COVID-19 roundtable convened by UUK with HE sector representatives later that day to discuss international students, exams and financial stability of the sector (Exhibits HS1/074 – INQ000607431, HS1/075 – INQ000607435 and HS1/076 – INQ000607436).

4.19. Internally, DfE ERG provided updates to the wider department on COVID-19 via the DfE Coronavirus Rolling Brief, a daily update detailing the COVID-19 situation at the time and the DfE response to it (Exhibit HS1/065 – INQ000607417). In addition, DfE was working with OGDs on responding to COVID-19, such as with the Foreign, Commonwealth & Development Office and PHE to develop advice for international students attending educational establishments in the UK.

4.20. On 6 March 2020 DfE was commissioned by the Cabinet Secretary to provide details on DfE preparedness for COVID-19. DfE officials returned risk scenarios of the possible impacts of COVID-19 (Exhibits HS1/077 – INQ000607420 and HS1/078 – INQ000607421). These included the impact on exams, the disruption to international students, the potential need to requisition HEP facilities for quarantine or student displacement, and the financial impact of HEP closure as well as the effects on students, exams, and student loans. Also on 6 March 2020, DfE was commissioned by CCS on possible NPIs against COVID-19. Responding on 7 March 2020, DfE detailed concerns around the impact of isolation on students in residential halls, noting they would be one of the most confined settings for self-

isolation, as well as the practicalities of mandatory isolation policies (for example, the cost of cleaning and support for students) (Exhibits HS1/079 –INQ000607422 and HS1/080 - INQ000542440).

4.21. From 9 March 2020 DfE worked with the OfS to monitor COVID-19 cases, as DfE needed this information for planning purposes. The OfS sent a letter to HEPs to request HEPs notify them of any COVID-19 cases (Exhibits HS1/081 - INQ000607430, HS1/082 - INQ000607433 and HS1/083 - INQ000641609).

4.22. On 15 March 2020 DfE provided an updated note to CO which detailed the feasibility of limiting social mixing/contact and applying a household policy within HEP halls of residence. The document noted that it would be difficult to maintain compliance with isolation requirements and could likely lead to spread of infection within the hall. This document also detailed the social impacts and mitigations for individuals subject to the policy, noting self-isolation could be difficult for young adults in halls (especially international students) given they would already be away from family and have limited contact with friends. The note set out that, as a mitigation to this, DfE would encourage HEPs to provide additional mental health support services to students (Exhibits HS1/084 - INQ000542439 and HS1/085 – INQ000542442).

4.23. On 16 March 2020 DfE officials sent an action plan to SSE and DfE ministers on a response to COVID-19. This outlined the need to consider the financial support for providers, including HEPs, which might otherwise not be viable as a result of lower demand, for example, from students delaying their start to the 2020/21 academic year. There was also an update on exams which included the implications for HE should there be any delay, though at that point exams were expected to go ahead as planned. The preference from the HE sector, if exams were delayed, was for entry dates not to slip and predicted grades be used along with other information available, such as HE admissions tests and teacher assessments (Exhibits HS1/086 - INQ000607437 and HS1/087 - INQ000514566).

4.24. On 19 March 2020 (Exhibits HS1/088 - INQ000519735 and HS1/089 – INQ000519467) and 21 March 2020 (Exhibit HS1/090 - INQ000519894) DfE guidance was published jointly with PHE. The first provided information on personal hygiene and social distancing. The second provided support for the management of young people isolating in residential educational settings, including university halls of residence.

4.25. In addition, in March 2020, SSE approved the inclusion of powers (see paragraph 4.11) into the Coronavirus Act 2020 on 13 March 2020, including the power for SSE to give a temporary closure direction to HEPs (Exhibits HS1/091 – INQ000540791 and HS1/092 – INQ000540793). The Act came into force on 25 March 2020 and included this power to give a temporary closure direction.

Announcement of the first national lockdown

4.26. As outlined in paragraph 4.2, when DfE officials had started to consider the potential implications of COVID-19 for HEPs, they had identified, in discussion with the HE sector, that it would not be possible for HEPs to close. This was due to many students living on campus who might not be able to return home and the need for essential research projects to continue. Initially the expectation was that teaching would continue face-to-face. As a result, in the meetings between SSE, MoSU and HEPs described at paragraph 4.18, HEPs had sought assurances from DfE that campuses would not be completely closed (Exhibit HS1/073 – INQ000607439) and ministers had confirmed that “*universities and other educational settings should remain open unless advised otherwise by PHE*” (Exhibit HS1/093 – INQ000607440).

4.27. Throughout March, as concerns within government about the resilience of the National Health Service (“NHS”) increased, government started work to consider the impact the closure of education settings, including HEPs, could have in reducing the spread of the virus.

4.28. At a meeting on 16 March 2020, SAGE agreed that Scientific Pandemic Infections Group on Modelling (“SPI-M”) should coordinate modelling on the impact school and university closures could have on NHS capacity (Exhibits HS1/094 – INQ000542444 and HS1/095 – INQ000075664). On 17 March 2020, DfE was commissioned by CO to draft a paper on school closures for a meeting with the Prime Minister the next morning (18 March 2020) and for COBR later in the afternoon (Exhibit HS1/096 – INQ000075399).

4.29. SSE and DfE officials considered (over the course of 17 to 18 March 2020) whether the closure of schools should be extended to apply to all education settings (Exhibits HS1/097 – INQ000607444, HS1/098 – INQ000107247, and HS1/099 – INQ000607448). DfE officials raised within the department the main concerns for HEPs in the event of closure, namely international students, student learning, HE

research, delivery of certain courses (such as healthcare courses), and institutional financial sustainability. The discussion over email noted that many universities had already communicated or were planning to run the summer term as online only, with the expectation that students would live back at home where they could. Also that around “25% of students are daily commuters” so would already not be attending HE settings and an option could be for the majority of teaching to move online and staff work from home, while keeping skeleton staff to support students in accommodation who were unable to return home (Exhibit HS1/100 – INQ000607445).

4.30. On the morning of 18 March, DfE provided the paper, *Reducing School Provision*, in response to the commission from CO (Exhibit HS1/101 - INQ000107248). The paper did not contain reference to closing HEPs. On the afternoon of 18 March 2020, DfE returned slides to CO for the COBR meeting that afternoon. These slides explained that many universities and other HEPs were already taking necessary steps to keep their staff and students safe and where possible keep providing education. The slides set out that DfE trusted HEPs and other institutions with students who were 18 and above to make the right decisions for them, in keeping with their autonomous status (Exhibit HS1/102 - INQ000056188).

4.31. COBR was held at 4 pm where it was agreed that schools and other education settings (not including HEPs) would remain open to children of critical workers. (Exhibit HS1/103 - INQ000107254). Then, at 5 pm and 5.16 pm, the Prime Minister and SSE respectively announced the closure of schools and other education settings to the majority of students (not including HEPs) at a press conference and in Parliament. During his statement to Parliament, SSE expressed confidence in Vice Chancellors to make the relevant decisions for their institutions and offered DfE support to facilitate them in doing so (Exhibit HS1/104 - INQ000075716). Schools and other settings (other than HEPs) then instituted partial closure on 20 March.

4.32. On 20 March 2020, MoSU wrote to HEPs asking them to put in place the necessary resources to support acutely affected and vulnerable students, stressing the potential impact on students who were international, care leavers, estranged from their families, disabled, or living with people in high-risk groups. MoSU further committed DfE to help in any way possible. The letter also requested online learning be made as widespread as possible in line with social distancing guidance

(Exhibit HS1/105 – INQ000641603). DfE had already been monitoring the number of HEPs which had moved to online teaching (Exhibits HS1/106 –INQ000183892, HS1/107 – INQ000055918, and HS1/108 – INQ000056058) Student accommodation remained open as did support functions, including libraries and student support services (Exhibit HS1/109 – INQ000056103).

4.33. Also on 20 March 2020, MoSU met with University Alliance to discuss COVID-19, how University Alliance could support government during the crisis, and the long-term stability of the HE sector, including the autumn admissions intake and the offers for prospective students. MoSU was clear that if institutions were facing extreme difficulty due to the circumstances, then this should be raised directly with her (Exhibit HS1/110 –INQ000607449).

4.34. On the morning of 23 March 2020, MoSU's office commissioned DfE officials to provide summary advice on student accommodation and catering, key workers in the HE sector, and the feasibility of continuity of tuition in the possible event of a lockdown. The advice produced in response included the potential implications for these issues in a lockdown scenario but set out that further discussion was needed. DfE officials explained that HEPs would have business continuity plans and could also draw on their major incident teams for support in responding to COVID-19 (Exhibits HS1/111 –INQ000607453 and HS1/112 –INQ000607454).

4.35. Later the same day, on 23 March 2020, the Prime Minister announced the first national lockdown (Exhibit HS1/113 – INQ000542940). To slow the spread of COVID-19, and to protect the NHS's ability to cope, the Prime Minister instructed that people stay at home and only leave under limited circumstances.

4.36. Following this, HEPs moved to online learning where possible and face-to-face attendance was restricted across campuses. Some activities continued such as essential research related to the pandemic. The Minister for Science, Research and Innovation wrote to HEPs to encourage research to be continued and to say BEIS would support and work with the research sector on how to respond to the challenges faced (Exhibit HS1/114 –INQ000607473). HEPs remained formally open, and there was a wide variation across and within institutions in the teaching and assessment available online and face-to-face for students in different years or on different types of courses (Exhibits HS1/115 –INQ000607460 and HS1/116 – INQ000607462).

The closure of buildings at the University of Cambridge

- 4.37. The Inquiry has specifically asked about the announcement by the University of Cambridge on 18 March 2020 that all university buildings would close from 20 March 2020 and whether this was a decision taken by the University independently of DfE.
- 4.38. As detailed in chapter 2 of this statement, HEPs are autonomous. At this point in the pandemic, DfE was encouraging HEPs to use PHE guidance in considering what steps they should take to protect students and staff from COVID-19 (Exhibit HS1/105 – INQ000641603). DfE did not direct or advise the University of Cambridge, or any other provider, to limit or reduce access to university facilities in or prior to March 2020.
- 4.39. As the government moved towards the decision to close schools and colleges to the majority of pupils on 18 March 2020, DfE officials were aware that this could influence HEP decision making about actions to take in response to the developing COVID-19 pandemic (Exhibit HS1/100 –INQ000607445). As shown in the letter written by MoSU to Vice Chancellors on 20 March 2020, DfE was clear that even if HEPs were to halt face-to-face teaching and close buildings on campus, “*cessation of face-to-face teaching in favour of online provision is not closure*” (Exhibit HS1/105 – INQ000641603). As noted when MoSU met the Vice Chancellor of the University of Cambridge on 26 March 2020, even with the closure of its buildings, the University had not fully closed down, with 2,000 to 3,000 students remaining on site, and vital work on single cell sequencing, therapies, vaccines and testing continuing to go ahead (Exhibit HS1/117 -INQ000607459).
- 4.40. Other HEPs took similar decisions in the days around the University of Cambridge’s announcement. For example, the University of Bristol closed all but one of their libraries and all of their sport facilities on 19 March 2020 (Exhibit HS1/118 -INQ000607673). University College London (“UCL”) closed most of their buildings on 20 March 2020 and strongly advised students to leave UCL and vacate halls where possible (Exhibit HS1/119 -INQ000607674). Different providers made different decisions based on their own context.

5. Response to the pandemic after the first national lockdown announcement (March 2020 to June 2022)

5.1. This section presents an overview of DfE's key actions during the remainder of the COVID-19 pandemic. It addresses the specific issues that arose during this period that have been covered in the Rule 9 request, set in the context of wider DfE activity.

March 2020 to September 2020

5.2. On 23 March 2020, DfE asked HEPs not to change offers already made to undergraduate students, including converting conditional offers to unconditional offers or changing entry requirements, for the next two weeks. This was to ensure stability and fairness for both students and universities, given that unconditional offers are sometimes used to persuade students to change their 'firm choice' (Exhibit HS1/120 - INQ000641627). This was in response to a small number of HEPs changing a proportion of their offers to undergraduate students from 'conditional' to 'unconditional' for the 2020/21 academic year, following the government's decision on 18 March 2020 to cancel exams for GCSEs, AS and A levels and other qualifications including vocational technical qualifications.

5.3. On 26 March 2020, MoSU sent a letter to HEPs, providing information on actions to take in response to the national lockdown announcement (Exhibits HS1/121 – INQ000607457 and HS1/122 - INQ000641604). The letter set out that students should remain where they were and stay indoors to reduce the transmission of COVID-19 and help protect the NHS. It emphasised the importance of mental health services at HEPs, the continuation of maintenance payments from the SLC for the final term, the Home Office's extension of visas for international students, and the availability of government schemes to support staff at HEPs and those students in paid employment. The advice for students to stay in their current accommodation, be that at home or student halls, was checked with PHE to ensure it was in line with current guidance and cleared by No.10 (Exhibits HS1/123 – INQ000607452 and HS1/124 -INQ000607456).

5.4. On 18 April 2020, MoSU sent a further letter to HEPs that set out details around DfE's work with UCAS, the OfS and sector representatives to stabilise the sector and support students. This also emphasised the department's position around how HEPs should make offers to prospective students, as DfE had already set out in its

press notice of 23 March 2020 (as set out in paragraph 5.2 above) (Exhibit HS1/125 - INQ000607464).

5.5. On 4 May 2020, DfE announced a suite of HE stabilisation measures to support the sector (Exhibits HS1/126 -INQ000607466, HS1/127 - INQ000607467, HS1/013 - INQ000607661 and HS1/014 - INQ000245884). A key part of this was the introduction by the department of Student Number Controls (“SNCs”), a temporary measure designed to prevent aggressive recruitment practices by some HEPs seeking to fill the places that would not be filled by overseas students in 2020/21. It was also confirmed that HEPs could apply for government support schemes (estimated by the OfS to be worth £700m to the sector), as well as the SLC bringing forward tuition fee payments to help providers (an estimated £2.6bn in payments). More detail on SNCs is included in the Corporate Statement provided by Jenny Oldroyd dated 28 July 2025 (Exhibit HS1/367 – INQ000651499).

5.6. On 21 May 2020, DfE published guidance for students and HEPs. This explained that HEPs should assist students in collecting their belongings left in student accommodation and provided advice for students on leaving student accommodation to return to an alternative residence (Exhibits HS1/128 - INQ000607475 and HS1/129 - INQ000607476).

5.7. On 3 June 2020, the main piece of guidance for the sector, *Higher education: reopening buildings and campuses*, was published. This guidance was updated throughout the pandemic following its publication, providing the sector with ongoing guidance based on scientific advice and government measures at the time (Exhibit HS1/130 - INQ000497888). This guidance was later renamed *Higher education (COVID-19) operational guidance* on 11 February 2021 (Exhibit HS1/131 - INQ000520155); please see Annex A for more details on this guidance and how it was updated throughout the pandemic. DfE worked with HEPs on drafting this guidance for the sector (Exhibits HS1/132 –INQ000607474 and HS1/133 – INQ000607477).

5.8. On 12 June 2020, DfE officials sent SSE and MoSU a submission, seeking their agreement on plans for “a full return” to HEPs in the autumn term of 2020 (Exhibit HS1/134 - INQ000607485). This was sent up alongside similar submissions from DfE officials covering the full reopening of all other education settings, including early years, schools and further education. The advice around HEPs set out key impacts, considerations, and potential options for the HE sector in the context of

two scenarios. The first scenario was around a full return of students to HEPs. This assumed that NPIs were relaxed and campuses were open to students and staff, but HEPs were offering a blend of face-to-face and online learning. The second, fall-back scenario was around campuses being open but with more emphasis on online teaching wherever possible and safe distancing, meaning that capacity of teaching spaces was much reduced.

5.9. On 22 June 2020, SSE's office responded with comments from SSE, special advisers and ministers. This set out, amongst other things, that DfE should work on the basis of a lead option whereby universities would open as fully as possible, compatible with PHE advice. This was likely to mean a mix of blended and face-to-face teaching, but that as much face-to-face teaching should be done as was compatible with the central health guidance (Exhibit HS1/135 - INQ000607495).

5.10. In the meantime, on 13 June 2020, DfE was commissioned by CO to draft a paper for a Prime Minister-chaired Covid Strategy meeting, to take place on 19 June 2020. This paper was requested to "*provide the information and set out the decisions needed for the C-19 Strategy Committee to agree the Government's objectives, planning scenarios and key milestones for the autumn term across all education settings*" (Exhibit HS1/136 - INQ000607478). SSE's office commissioned DfE officials to draft this paper, and it was sent to CO on 17 June 2020 (Exhibits HS1/137 - INQ000607492 and HS1/138 - INQ000263377).

5.11. The paper covered the entirety of DfE's objectives and preparation for the "*expanded reopening*" of education settings in the autumn term. It set out the department's ambitions in planning for a full return of pupils and students to education settings in September 2020, but set out two scenarios, which it asked the meeting to agree to. The first scenario was around a full return of pupils and students to education settings in September 2020, the second around a partial return. For HE, the paper made the same recommendations for each scenario as set out in the submission described at paragraph 5.8. Under the full return scenario, campuses would be open to staff and students, with teaching carried out through a blend of online and face-to-face provision and HEPs continuing to adopt a combined model of learning, in the short term at least. Under the fall-back scenario, students would return to university accommodation but with social distancing measures in place. Online learning would be the primary teaching delivery method. The paper set out that DfE was discussing with SAGE subgroups and PHE how to

assess the extent of health risks and how that would inform changes that were required to allow a full return.

5.12. As part of this work, on 9 July 2020, SAGE 46 discussed a paper drafted by DfE on options for education settings, including HEPs, for the upcoming autumn term (Exhibits HS1/139 - INQ000607668 and HS1/140 - INQ000075460). SAGE concluded that guidance on this for the sector should be considered ahead of the autumn term starting. SAGE noted that there were features specific to FE and HE settings which differed from other educational settings (such as schools) and other workplaces.

5.13. On 16 July 2020, DfE presented a paper to Covid O that recommended that government should encourage and enable HEPs *“to reopen as fully as possible in September, but the decision on whether and how to reopen should remain with providers as autonomous institutions”* and that clear guidance should be published (Exhibit HS1/141 - INQ000607656). At this point, DfE officials were already tracking HEPs’ plans for September, with analysis showing that 85% of providers who had responded to one survey were planning to offer both face-to-face and online provision (Exhibit HS1/139 - INQ000607668).

5.14. Also on 16 July 2020, DfE announced the Higher Education Restructuring Regime. The scheme supported HEPs in England facing financial difficulties as a result of COVID-19. Funding was subject to strict conditions and assessed on a case-by-case basis. Three HEPs applied to the scheme; one was successful and received £7.3 million in the form of a repayable loan. The scheme closed to new applicants on 31 December 2021 and was withdrawn on 13 April 2022 (Exhibits HS1/142 – INQ000607708 and HS1/143 – INQ000641606).

5.15. On 18 August 2020, MoSU chaired the first meeting of a new DfE Higher Education Taskforce (Exhibit HS1/144 - INQ000514536), set up by DfE to help the department understand the issues and challenges that HEPs were facing and to provide support and work with them to resolve these issues. Initially, the Taskforce focussed on centre assessment grades (“CAGs”) and the impact on HEPs (Exhibit HS1/145 – INQ000514695) (see the Grade Calculations in August 2020 section of this statement below, from paragraph 5.21) before moving on to other issues affecting the HE sector. The Taskforce was attended by HE sector groups, including UCAS, the OfS, UUK, Guild HE, the Russell Group, Universities Alliance, and Million Plus, as well as officials from DfE, His Majesty’s Treasury (“HMT”) and

DHSC (Exhibits HS1/146 – INQ000607509 and HS1/147 – INQ000607510) (see the Grade Calculations in August 2020 and Mental health and wellbeing of young people sections of this statement below for further detail on the work that the Taskforce took forward).

5.16. On 20 August 2020, SAGE 52 discussed a HE and FE Task and Finish sub-group output paper, *Opening Higher Education and Further Education settings in Autumn*, around “re-opening plans” for HE and FE settings in autumn 2020, including considerations around ventilation in settings, the risks of limiting attendance on-site, international travel, transport options and mixing of people on campuses (Exhibit HS1/148 - INQ000607662). Following the discussion, an action was taken for the SAGE secretariat to support revisions of the paper, incorporating comments from SAGE and representatives from its subgroups, with an amended paper to go back to SAGE by 28 August 2020.

5.17. SAGE 53 subsequently agreed that the HE and FE paper would be split into separate HE and FE papers and presented at SAGE 54 on 1 September 2020 (Exhibit HS1/149 - **INQ000120552**). As set out in paragraph 5.22.2 of this statement below, formal papers were then prepared, led by Government Office for Science (“GO-Science”) which were discussed at SAGE 54 (Exhibits HS1/150 – INQ000607512 and HS1/151 - INQ000607663). Following further revisions, on 3 September 2020, SAGE 55 endorsed the paper, entitled *Principles for managing SARS-CoV-2 transmission associated with higher education*, which informed DfE’s preparations for the 2020/21 academic year, including the need for HEPs to have comprehensive outbreak management plans (see *Principles for Managing SARS-CoV-2 Transmission Associated with Higher Education*, September 2020 section of this statement below for further details on this paper) (Exhibits HS1/152 - INQ000607664 and HS1/153 – INQ000607517).

5.18. Also on 3 September 2020, Covid O agreed with a number of actions provided in a paper by DfE, *HE Re-opening Update for COVID-O*, for the reopening of HEPs to face-to-face teaching in autumn 2020 (Exhibit HS1/154 - INQ000090217). These included updating guidance, working with DHSC Test and Trace on a testing regime for HE, ensuring outbreak management plans were in place, and monitoring universities’ “readiness to open” (Exhibit HS1/155 - INQ000497684).

5.19. On 10 September 2020, MoSU announced the updating of guidance for HEPs ahead of reopening to face-to-face teaching in September 2020, based on the latest

SAGE advice (see paragraph 5.22.5), and outlined that “...the SAGE group has made clear that teaching in person is important and fully online provision would have an impact on students’ mental health. Where practical work occurs in close contact like medicine, dentistry and performing arts, universities should follow advice for the relevant professional environment.” (Exhibit HS1/156 -

INQ000546774). This was followed by a statement in the House of Commons on 29 September 2020 by SSE on the return of students to HEPs, outlining that they would follow the same guidance as local communities, that testing capacity would be sufficient and additional and that HEPs would provide practical help for students (Exhibit HS1/157 - INQ000607665).

5.20. The Inquiry has asked for specific details on certain events during this time period. These are covered in the sections below:

5.21. Grade calculations in August 2020

5.21.1. The Inquiry has asked DfE to set out the guidance and/or support that it offered to HEPs in relation to the reversal of the decision about grade calculation in August 2020 (in England). DfE is responsible for decisions in this area for England only, with the DAs operating separately.

5.21.2. On 17 August 2020, following the publication of A level grades awarded using Ofqual's standardisation model, Ofqual's board took the decision to revert to CAGs. More detail on the reasons for this decision are set out in the Corporate Statement provided by Jenny Oldroyd dated 28 July 2025 (Exhibit HS1/367 – INQ000651499). The CAGs were higher than the grades awarded using the standardisation model, which meant that more students than expected met the terms of their HE offers. Generally, when HEPs make an offer of a place to a prospective student and the offer is accepted, a contract is formed between the HEP and the student, with the HEP being usually obliged to admit the student on the relevant course of study if they meet the entry requirements and enrol. This meant that some HEPs were left with more students than they had planned for.

5.21.3. This created cost pressures for the government in the shape of more student loans needed and cost pressures for HEPs through more staff, accommodation and facilities. DfE officials discussed with HMT officials the cost implications that this could have for HEPs (Exhibit HS1/158 - INQ000607508) and sent a

detailed note to No.10 setting out the implications of the move to CAGs for HE and FE (Exhibits HS1/159 - INQ000514534 and HS1/160 - INQ000514535). Included in this note was the department's rationale for removing the student number controls which had been introduced by the department in May 2020 (see paragraph 5.5 of this statement). SNCs had been implemented to stabilise the sector, not to penalise providers, and DfE no longer saw them as necessary. They had been successful in stabilising the sector when they were introduced earlier in the year and brought an end to the aggressive recruitment practices that they had been intended to prevent. At this point they were potentially a blocker in enabling as many students as possible to gain their university places, and DfE wanted to ensure providers were not constrained or penalised for doing this because of SNCs.

5.21.4. On 19 August 2020, the government and the HE Taskforce (see paragraph 5.15) together agreed that HEPs would honour all offers across courses to students who met their conditions for the 2019/20 academic year wherever possible, or if maximum capacity was reached to offer an alternative course or a deferred place. The government also lifted the cap on domestic medicine, dentistry, veterinary science and undergraduate teacher training places. These caps had been introduced by the government in previous years to ensure teaching, learning and assessment standards were maintained for these courses, as well as ensuring there were enough high-quality placements for each student. Extra teaching grant funding was provided by the government to increase capacity in medical, nursing, STEM and other high-cost subjects. (Exhibit HS1/161 - INQ000514698).

5.21.5. On 20 August 2020:

5.21.5.1. MoSU wrote to HE students, via UCAS, setting out the process they should follow if they were still seeking a place at university, or if their course was full (Exhibits HS1/162 - INQ000514541 and HS1/163 - INQ000514542).

5.21.5.2. MoSU also wrote to all HEP Vice Chancellors. In this letter, MoSU said: *"I know, having spoken to a great deal of providers and sector bodies over the last 48 hours, that you plan to be as flexible as possible and that we all agree that providers should:*

1. Honour all offers accepted to date.

2. Honour all offers made and met through the new arrangements for both firm and insurance offers where students would like to take them, wherever this is possible”
(Exhibits HS1/164 - INQ000514544 and HS1/165 - INQ000514545).

5.21.6. DfE monitored the numbers of school and college pupils who had secured a university place in 2020/21 or deferred to 2021/22 for the remainder of August 2020 and into September 2020.

5.21.7. In any cycle there are a number of unplaced students in early September. Some hold out for a better offer, some decide not to go to university in that academic year, and some find a job or an apprenticeship instead. A number of courses have additional requirements beyond A level grades, such as a satisfactory Disclosure and Barring Service check, and some applicants have to wait for those before being formally admitted. This is a complex and dynamic system in which both institutions and individuals make multiple, connected choices, and do not need to report all of them through UCAS (Exhibit HS1/166 - INQ000607755).

5.21.8. According to UCAS data from 2006 to 2024, the percentage of applicants not accepted at the end of the admissions cycle ranges from 21.1% to 29.4% with an average of 24.8%. The figure in 2020 (21.1%) is the lowest in the timeseries (Exhibit HS1/167 – INQ000607756)

5.21.9. In August 2020, the introduction of CAGs and the associated higher grades awarded, meant that there were a number of students, an estimated 15,000, who had not originally been given a place at their firm choice but who were now eligible. DfE worked with the sector to reduce the number of students who had not been able to secure a place. This was the main focus of the HE Taskforce that had first met on 18 August 2020, until it pivoted to the September return of students to HEPs. By 4 September 2020, 87% of the students estimated to be eligible for their firm (first) choice, and not originally given a place at their firm choice before the introduction of CAGs, had been placed either at their firm choice, insurance choice, or another comparable HEP. 3% were placed at a lower tariff provider

compared with their original firm choice. Fewer than 10% of the 15,000 students remained unplaced. (Exhibit HS1/166 – INQ000607755).

5.21.10. DfE also monitored the impact of individual and institutional behaviour on different types of HEP. Because more students met the terms of their offer, high tariff providers took more students than usual. This had a knock-on impact on medium tariff providers which lost students to high tariff providers and took students who might otherwise have attended low tariff providers. According to UCAS data, acceptances in 2020 were up 29,235 (5.4%) compared to 2019. These increases varied by tariff group of providers with greater increases at high tariff providers (13.2%) and a smaller increase for medium (3.7%) and low (1.1%) tariff providers (Exhibit HS1/167 – INQ000607756). With regard to the tariff groups, HE providers are designated as low, medium or high tariff. They are divided into these 3 groups, roughly equal in size, according to the average number of UCAS points achieved by students joining them (Exhibit HS1/362 – INQ000650958). High tariff universities are therefore those requiring the most UCAS points for entry. The groups are adjusted every year according to the tariff points for that year (Exhibits HS1/368 – INQ000624689, HS1/369 – INQ000624688 and HS1/370 – INQ000624687).

5.22. *Principles for Managing SARS-CoV-2 Transmission Associated with Higher Education* paper, September 2020

5.22.1. The Inquiry has asked specifically about DfE's involvement in the drafting and publication of the paper, *Principles for Managing SARS-CoV-2 Transmission Associated with Higher Education*, in September 2020 and to what extent the impact of closures on the mental health of young people was considered by SAGE and/or DfE in relation to DfE guidance.

5.22.2. GO-Science led on coordination of the drafting of this document (Exhibit HS1/150 – INQ000607512). DfE was commissioned to provide specific pieces of information and data, alongside colleagues from SPI-M, the Independent Scientific Pandemic Insights Group on Behaviours ("SPI-B"), New and Emerging Respiratory Virus Threats Advisory Group ("NERVTAG"), GO-Science and the Environmental Modelling Group ("EMG") (Exhibit HS1/168 – INQ000607511). DfE was specifically asked to provide a summary of the contexts for HE and FE, including the location of students, the percentage who commuted to HEPs or FE colleges, information around vulnerable groups

across both staff and students, and an indication of courses with vocational/placement training. DfE officials, including DfE's Chief Scientific Adviser ("CSA"), were then given the opportunity to provide comments on the draft before it was put to SAGE (Exhibit HS1/169 – INQ000607515).

5.22.3. On 1 September 2020, Professor Catherine Noakes, a member of the Task and Finish Group, led discussion of the paper in SAGE 54 (Exhibit HS1/151 - INQ000607663). Professor Noakes and the SAGE secretariat then made further amendments to the paper based on the SAGE discussion. The amended paper was endorsed by SAGE 55 on 3 September 2020 (Exhibit HS1/152 - INQ000607664). Professor Noakes and DfE officials then signed the document off for publication (Exhibit HS1/153 – INQ000607517).

5.22.4. On 4 September 2020, the paper was published (Exhibits HS1/170 - INQ000607710 and HS1/171 - INQ000607711). It included that: *"There is evidence of physical and mental health impacts from missing or limited access to education and from the reduced social interaction and support that can arise from remote learning. Although direct evidence in HE is more limited than in schools, survey evidence related to COVID-19 indicates disruption to research and learning, lower wellbeing and increased mental distress"*.

5.22.5. On 10 September 2020, DfE guidance for HEPs, updated to include the findings from the paper, was published (Exhibit HS1/172 - INQ000607679) (see also paragraph 5.19 on the announcement of this guidance by MoSU). DfE amended the guidance to emphasise the importance of face-to-face teaching, with the majority of teaching happening online only as a last resort. It also contained a new section on SAGE's findings on the benefits of segmentation (for example the creation of small, sub-networks of students and staff), as a way of reducing the risk of transmission and enabling more targeted closure or quarantine.

5.22.6. DfE's wider work around student mental health and wellbeing during the pandemic, including mental health issues as a result of the lockdowns is covered in the Mental health and wellbeing of young people section of this statement (see paragraph 5.48 onwards).

September 2020 to January 2021

5.23. Following the return of students to HEPs in September 2020, DfE prioritised establishing COVID-19 testing within HEPs. Face-to-face teaching in education settings was a priority for the government in order to reopen society and help the economy. Testing was seen as vital for HEPs to offer face-to face teaching and to identify outbreaks early. At the beginning of September, demand for testing using PCR tests was outstripping supply across the UK, potentially affecting the full reopening of universities (Exhibits HS1/371 – INQ000497633 and HS1/372 – INQ000497634). An order of prioritisation for the education and childcare sector was set out to SSE, who initially asked for universities to be included in the priority 1 group (Exhibit HS1/373 – INQ000497639). However, due the lack of supply indicated by DHSC and CO, SSE made the decision to prioritise school and college workforces ahead of other education and care workers, including the university workforce, as they could more readily teach remotely (Exhibit HS1/374 – INQ000497653). On 17 September 2020, SSE wrote to the Secretary of State for Health and Social Care (“SSHSC”) on the prioritisation of education COVID-19 testing, advising he wanted to see the education workforce and HEP students at the *“top of the priority list after continued focus on health and adult social care”* and work on *“COVID-secure testing facilities in every university health centre”* and a *“communication plan for engaging universities’ own testing capacity”* (Exhibits HS1/173 - INQ000497651 and HS1/174 - INQ000497660).

5.24. During September 2020, DfE worked with DHSC to assess the access HE campuses had to PCR testing provision, ensuring additional testing facilities were made available. To do this, DfE and DHSC evaluated and mapped the local test sites to see whether HEPs had no test site or a test site within a 1.5 or 3 mile radius (Exhibits HS1/175 – INQ000607522, HS1/176 – INQ000607521 and HS1/177 - INQ000607520). DfE also worked with NHS Test and Trace on piloting mass testing in education settings, as lateral flow device (“LFD”) testing technology became available (Exhibits HS1/375 – INQ000497678 and HS1/376 – INQ000497679). These pilots of mass asymptomatic testing, including plans for testing in HEPs, began on 19 October 2020 (Exhibits HS1/178 – INQ000497682, HS1/179 - INQ000497680 and HS1/180 – INQ000497683). DfE worked with DHSC to deliver the roll out of mass asymptomatic testing in HEPs in November 2020, DfE providing guidance on what HEPs needed to do to enable testing (Exhibits HS1/181 - INQ000497688 and HS1/182 - INQ000497891). The pilot testing was key to

working towards and establishing daily contact testing in December 2021, a key moment in the response to the pandemic.

5.25. On 7 November 2020, MoSU sent a letter and briefing pack to HEPs on the roll out of asymptomatic testing, gathering initial thoughts ahead of question and answer (“Q&A”) sessions for HEP leaders on 9 and 10 November 2020 (Exhibits HS1/183 - INQ000497685 and HS1/184 - INQ000497687). In addition, on 11 November 2020, MoSU announced that HEP students travelling home at the end of the autumn term should test prior to travelling, with guidance released alongside the announcement (Exhibits HS1/185 - INQ000075697 and HS1/186 - INQ000075698).

5.26. On 18 December 2020, MoSU issued a letter to Vice Chancellors to reiterate the importance and encourage the uptake of testing by universities (Exhibits HS1/187 – INQ000607558 and HS1/188 – INQ000607560). This followed a debate within government around whether students were driving transmission.

5.27. The *Coronavirus (COVID-19) Infection Survey (CIS)* by the Office for National Statistics (“ONS”), looking at positivity rates from early August 2020 and mid-November 2020, showed rates were highest among teenagers and young adults, although the survey did acknowledge the difficulty in capturing prevalence and transmission rates of COVID-19 among HE students. In the paper, *Principles for managing SARS-CoV-2 transmission associated with higher education* (see paragraph 5.22), from September 2020, SAGE had warned there was “a significant risk that Higher Education (HE) could amplify local and national transmission” (Exhibit HS1/189 – INQ000607740). However, a study conducted by PHE from 2 to 11 December 2020 estimated that fewer than 1 in 5 (17.8%) university students had COVID-19 by the end of the autumn term, with the highest rates among students in halls of residence. The study highlighted the importance of regular testing of students in preventing the spread of COVID-19 (Exhibit HS1/190 - INQ000607739).

5.28. On 25 January 2021, twice weekly testing was introduced at HEPs and after low uptake in the first week (Exhibit HS1/191 - INQ000497739), on 17 February 2021 MoSU’s office confirmed that DfE would actively monitor those with a lower uptake and work with HEPs to drive this up (Exhibit HS1/192 - INQ000497747). Between 18 February 2021 and 24 February 2021, 54,048 LFD tests had been taken as part of HE (Exhibit HS1/193 - INQ000607736). By 10 February 2021, 600,000 tests had been reported in HE settings (Exhibit HS1/363 - INQ000650959). DfE has not calculated the percentage of students this represents, as the data does not show

whether these statistics included individuals taking multiple tests. It is also likely that more tests were taken by students than were reported. Overall, the pilots and subsequent roll out of mass testing in HEIs did not encounter huge difficulties, with the testing prior to the 'student travel window' running smoothly (Exhibit HS1/377 – INQ000075484) and feedback from HEIs being that they were “*overwhelmingly in favour*” of rapid testing as well as them being under pressure from staff unions to provide regular testing (Exhibits HS1/378 – INQ000497725 and HS1/039 – INQ000497726).

5.29. In addition to testing, throughout autumn 2020 DfE officials worked with the OfS to set up a COVID-19 data reporting tool for HEPs, which went live on 16 October 2020 (Exhibit HS1/194 – INQ000607530). This was in line with data collection happening in other sectors, such as Children's Social Care (Exhibit HS1/195 - INQ000540938), and wider government reporting on COVID-19 rates.

5.30. HEPs were initially asked to submit COVID-19 case rates on a daily basis as well as collecting additional data throughout the pandemic in response to what was happening at the time (for example vaccine uptake in September 2021) (Exhibits HS1/196 – INQ000607640, HS1/197 – INQ000607643 and HS1/198 - INQ000607646). Reporting was paused over the Christmas period, outlined to HEPs on 9 December 2020 (Exhibits HS1/199 – INQ000607557 and HS1/188 – INQ000607560), MoSU asking, in the letter on 18 December 2020 (see paragraph 5.26), for this reporting to continue from January 2021. This allowed DfE to establish an accurate picture of the ongoing situation.

5.31. Along with testing and data collection, DfE focussed on establishing the 'student travel window' to allow students to be able to return home for Christmas, outlined in the statement to the House of Commons on 29 September 2020 by SSE (see paragraph 5.19). On 26 October 2020, MoSU agreed advice on plans for managing the end of the winter term in HE, with HEPs moving to online teaching by 8 December to facilitate students to return home (later changed to 9 December, see paragraph 5.33) (Exhibits HS1/200 – INQ000607531 and HS1/201 - INQ000607538).

5.32. New national restrictions were announced on 2 November 2020, in place from 5 November 2020 (Exhibit HS1/202 - INQ000607666), with MoSU sending a letter on the same day to HE students studying at HEPs outlining that they should remain in their current home for a 4-week period, from 5 November until 2 December 2020

(Exhibit HS1/203 - **INQ000641598**). Guidance was also published on 3 November 2020, *Higher education: new national restrictions guidance*, alongside the HE operational guidance on GOV.UK, cleared by No.10 the previous day (Exhibits HS1/204 - INQ000607545, HS1/205 - INQ000607546, HS1/206 – INQ000607675 and HS1/207 - INQ000519799).

5.33. The announcement by MoSU on 11 November 2020 (see paragraph 5.25) outlined that a 'student travel window' would be in place between 3 December and 9 December, following the 4-week period of national restrictions, in order to reduce social contact and likelihood of transmission. It also outlined that "*universities should move learning online by 9 December so students can continue their education while also having the option to return home to study from there*" (Exhibits HS1/185 - INQ000075697 and HS1/186 - INQ000075698). The move to online learning by 9 December was timed to be one week after the national restrictions were due to end on 2 December (Exhibits HS1/208 – INQ000607542 and HS1/209 – **INQ000546572**).

5.34. Students were expected to test before travel and on arrival at home. The specific dates of the 'student travel window' ensured that students who tested positive before leaving their HEP could complete a period of isolation and still travel home in time for Christmas, and that if a student tested positive on returning home and needed to self-isolate, they too would have completed that period before Christmas.

5.35. In this period, DfE was also working on the return of students to face-to-face learning in January 2021, after the Christmas break. There was evidence in September and October 2020 that COVID-19 was most prevalent in 17 to 21 year olds (Exhibits HS1/210 - INQ000607539, HS1/211 – INQ000607540 and HS1/212 - INQ000607541); it was not possible to isolate HE students within this data but there was discussion of a possible correlation, in that at and after the time students returned to HEPs in September 2020 there was an increase in the virus. This was set out in slides provided by DfE officials to MoSU on 17 October 2020 (Exhibits HS1/213 - INQ000607532 and HS1/214 - INQ000607533).

5.36. The high cases among young adults and older teenagers in September followed a summer with more relaxed rules around social mixing and occurred in a context where respiratory viruses generally tended to grow over autumn and into winter. This made it particularly difficult to assess the extent to which HE students could be driving the transmission of COVID-19.

- 5.37. DfE officials sent a briefing to SSE on 30 October 2020, ahead of a Cabinet meeting, which noted that the scientific evidence was unclear on the role of educational settings in transmission, particularly regarding older pupils and students. The briefing flagged that SAGE had not yet come to an updated consensus view on this. At the same time, DfE officials reviewed survey data from the ONS on student behaviour in respect of COVID-19 restrictions which suggested that students were largely compliant with these.
- 5.38. In November 2020 DfE officials worked with PHE and the Joint Biosecurity Centre (“JBC”) to undertake analysis of the impact students returning to university had had on local transmission of COVID-19. This analysis found that the return of HE students had had a varied impact across the country. In areas with high case rates in the student aged population, data suggested that some areas had seen little impact on the general population, whilst others had seen a preceding rise in student case rates before a rise in general rates, possibly indicating causal relationships. In light of this mixed evidence, DfE officials worked to consider the return of students in a way that would balance the risk of transmission against the need to support student mental health, and increase face-to-face teaching as much as possible (Exhibits HS1/215 – INQ000607551, HS1/216 – INQ000607552 and HS1/217 – INQ000607555).
- 5.39. In autumn 2020, DfE conducted further analysis on the impact of COVID-19 on HEPs in England, collaborating with the Children’s Task and Finish Group to update the evidence. For September to November 2020, PHE testing data showed that the initial peak of infection among HE attendees and the primary HE age cohort (18 to 22 years) coincided with the opening and closing times of HEPs and occurred before peaks seen in younger age groups. However, this also reflected the broader epidemic curve at the time, and not all individuals in the primary HE age cohort were enrolled in HE. In contrast, the timing of the second peak at the end of 2020 did not vary significantly between different age groups (Exhibit HS1/218 – INQ000607569).
- 5.40. Regarding transmission between the community and university, the relationship between student case rates and local population case rates was influenced by factors such as student residence and employment in local communities, making it challenging to attribute increases in community rates solely to student outbreaks (Exhibit HS1/219 – INQ000607747).

- 5.41. In light of the announcement of the new national restrictions on 2 November 2020 (see paragraph 5.32) and rise in COVID-19 cases across parts of England, on 28 December 2020 DfE officials provided options to SSE on how to reduce transmission amongst children and young people, including in HE (Exhibit HS1/220 - INQ000075682). The advice recommended that the first phase of returning students to HEPs should be restricted to students studying medicine, subjects allied to medicine, veterinary science, education and social work, and courses which required professional, statutory and regulatory body assessments and or mandatory activity which were scheduled for January 2021, and which could not be rescheduled. This list of courses had been agreed with HEPs as they were essential to maintain the pipeline of key workers.
- 5.42. On 29 December 2020, senior officials from DfE, DHSC, PHE, JBC, NHS Test and Trace, CO and the Deputy Chief Medical Officer (“DCMO”) met. It was agreed that the first phase of HE students returning to face-to-face teaching (those within the practical student cohort) should be reduced from 40% (all practical courses) to 20% (the specific priority courses listed above), following an increase of COVID-19 cases due to the Alpha variant of COVID-19, and that the return timetable for all other students would be reviewed on 18 January 2021 (Exhibit HS1/221 - INQ000075506).
- 5.43. On 30 December 2020, the Prime Minister and SSE announced that HEPs had been asked to reduce the numbers of students returning to campus on 4 January 2021 (Exhibit HS1/222 - INQ000075739). Following this, on 31 December 2020, MoSU sent letters to HEPs and students announcing the plans for returning in January 2021 (Exhibits HS1/223 - INQ000641608 and HS1/224 - INQ000607562).
- 5.44. On 7 January 2021, DfE published the guidance, *Students returning to, and starting higher education in Spring Term 2021*, as part of the HE operational guidance document (see Annex A for more details on this update), advising HEPs to ask students not to return to campus until at least mid-February 2021 and that they should start the term with remote learning (Exhibits HS1/225 - INQ000607565 and HS1/226 - INQ000607566), with the exception of students on specific priority courses (Exhibits HS1/227 - INQ000075673, HS1/228 - INQ000075520 and HS1/229 - INQ000075521).
- 5.45. On 14 January 2021, DfE’s Permanent Secretary convened the first meeting of a new DfE Permanent Secretary Stakeholder Group (“PSSG”), a regular cross-sector

forum designed to consider important issues related to the COVID-19 response and education recovery. PSSG brought together senior DfE representatives with key stakeholders and representatives from across the education sector and met throughout the remainder of the pandemic period. UUK represented the HE sector on the Group (Exhibit HS1/230 - INQ000607649).

5.46. The Inquiry has asked for specific details on certain events during this time period. These are covered in the sections below:

5.47. University of Manchester barriers

5.47.1. The Inquiry has asked about the incident at the University of Manchester in November 2020 where barriers were constructed around halls of residence, and whether the department was involved.

5.47.2. DfE played no part in the decision to erect the barriers at the halls of residence on 5 November 2020 and was not informed in advance by the University of Manchester that they were taking this action. Upon learning what had taken place, MoSU met with the Vice Chancellor of the University of Manchester later on the same day to discuss the incident and confirm the barriers would be removed (Exhibit HS1/231 – INQ000607547). An apology was issued by the Vice Chancellor later that evening, in response to the distress caused to students by the erecting of the barriers (Exhibit HS1/232 – INQ000607548).

5.47.3. Following the meeting between MoSU and the Vice Chancellor, MoSU instructed DfE officials to remain in close contact with the university and asked Minister Malthouse (Minister for Crime and Policing February 2020 to July 2022) to speak to the Greater Manchester Police about the issues the university was facing. On 6 November 2020, DfE officials met with representatives of the University of Manchester to confirm the removal of the barriers and that additional security had been deployed instead. DfE officials fed back that the University of Manchester had taken the decision to put up the barriers ahead of bonfire night to manage the flow of students and prevent large gatherings (Exhibit HS1/233 – INQ000607549). This was because they had seen an increasing number of student parties, including one with around 1000 students, since the University had got over a spike of COVID-19 infections earlier in the term. No further developments were reported, and the university President

issued a statement saying an inquiry would take place into the decision.
(Exhibits HS1/234 – INQ000607744 and HS1/235 – INQ000607745).

5.48. Mental health and wellbeing of young people

5.48.1. The Inquiry has asked DfE to outline the work undertaken, either during the specified period or since, to analyse the extent to which the pandemic, or the measures taken to address it, had an impact on the mental health and wellbeing of young people who were attending HE during the specified period. The Inquiry has asked if conclusions were drawn by DfE as a result and whether any measures have been put in place to mitigate any negative impacts. In addition, the Mental health and wellbeing section in Chapter 6 (see paragraph 6.37 onwards) of this statement outlines the monitoring and assessment of HE students' mental health and wellbeing during and after the COVID-19 pandemic.

5.48.2. Student mental health policy sits in a complex landscape, not least because students are adults and other young people their age are already in the workforce. This landscape is made up of HEPs, government, the NHS and a number of charities. DHSC are responsible for the provision of clinical mental health services for the whole population, including students, delivered through NHS mental health services.

5.48.3. Most of DfE's work in the student wellbeing and mental health policy area (which is detailed below) was developed or delivered collaboratively with organisations including the OfS; Student Minds, a student mental health charity; Association of Managers of Student Services in Higher Education ("AMOSSHE"), the student services organisation; and UUK.

5.48.4. Resources, surveys and studies used by DfE to analyse and understand the impact of the pandemic on the mental health and wellbeing of young people attending HEPs during the specified period is included in chapter 6 (see paragraph 6.37 onwards) below.

Work undertaken to address the impact of the pandemic on the mental health and wellbeing of young people attending HEPs during the specified period

Mental health advice, funding and support

5.48.5. As set out throughout this statement, MoSU wrote regularly to HEP Vice Chancellors and directly to students during the pandemic. Many of these letters

included information about the support available to students and reminders to HEPs of their responsibility of care, especially in relation to student mental health (Exhibits HS1/105 – INQ000641603 and HS1/236 - INQ000607596). As set out in paragraph 4.32 of this statement, MoSU first wrote to the sector about COVID-19 on 20 March 2020 and the following was included in a Q&A section attached to the letter:

“We would expect HEPs to ensure that students continue to have access to a counsellor or mental health adviser to support their wellbeing. Online sources are also available to support students, including that provided by the mental health charity, Mind. The NHS site also lists mental health support apps”.

5.48.6. Starting in March 2020, DfE funded the development of new and innovative practice through OfS Challenge Competitions, with HEPs able to use this funding to take forward work around improving student mental health. For example, funded by the OfS Challenge Competition, the University of Liverpool developed an immersive virtual reality environment to deliver remote peer and tutor support to health students on placement.

5.48.7. On 30 April 2020, following work with HEPs and other stakeholders, as well as consultation on the contents with DfE (Exhibit HS1/237 - INQ000607465), OfS published a detailed briefing note on its website, setting out steps HEPs were taking to support students during the COVID-19 pandemic and signposting further information (Exhibit HS1/238 - INQ000607676).

5.48.8. On 17 June 2020, in a speech at the Higher Education Policy Institute (“HEPI”) annual conference, MoSU covered available and new mental health support for HE students (Exhibit HS1/239 – INQ000607726). This included a reminder that hardship funding was available, with HEPs able to draw upon grant funding aimed at access and provision, worth up to £23 million per month from April to July 2020 (and not mentioned in the speech, up to £256 million for academic year 2020/2021).

5.48.9. Within this speech, MoSU also announced the launch of Student Space, a key new online resource that would provide a variety of mental health and welfare support services. MoSU also used the speech to again set out to HEPs their responsibility to students including in relation to student mental health.

- 5.48.10. On 10 August 2020, Student Space was launched, led by Student Minds. DfE funded Student Space with £3 million via the OfS (Exhibit HS1/240 - INQ000607677).

Convening HEP sector organisations and bodies on student mental health and wellbeing

- 5.48.11. In September 2020, MoSU commissioned DfE officials to provide advice on convening a mental health taskforce. On 1 October 2020, after considering options, MoSU approved this work going ahead and terms of reference and membership of the taskforce were agreed (Exhibit HS1/241 – INQ000607529).
- 5.48.12. DfE's HE Mental Health and Wellbeing Taskforce, which came into being in October 2020 was established as a short-term sub-group of the DfE HE Taskforce that had already been set up by MoSU in August 2020 (see paragraph 5.15). This would:
- 5.48.12.1. seek direct feedback from sector and student representatives on how they are managing mental health and wellbeing.
 - 5.48.12.2. understand any systemic barriers that were getting in the way of good support to students including whether there were any students/groups that may have been particularly affected by mental health concerns at the time.
 - 5.48.12.3. discuss issues relating to hardship/finances where they intersected with mental health and wellbeing.
 - 5.48.12.4. provide a forum for the HE sector to work closely together with health sector colleagues on the key challenges.
- 5.48.13. Membership of the Mental Health and Wellbeing Taskforce was made up of HE sector organisations such as UUK, Million Plus, University Alliance and the Russell Group, as well as officials from DfE, DHSC, PHE, NHS England and the OfS. The Taskforce met for the first time on 22 October 2020, chaired by MoSU and then met regularly until late spring 2021.

- 5.48.14. As a representative example of what was covered in Taskforce meetings, in the meeting on 22 October 2020 (Exhibit HS1/242 – INQ000607671) areas discussed by the Taskforce included:
- 5.48.14.1. updates from providers on what they were doing around mental health services, as well as the situations they were facing.
 - 5.48.14.2. monitoring and addressing the demand for mental health services.
 - 5.48.14.3. discussions around the most pressing issues, including feedback from Student Minds on what they were seeing from students contacting Student Space and feedback from AMOSSHE on trying to balance managing whole population wellbeing with enhanced support for more acute cases.
- 5.48.15. In January 2021, SSE announced a new Mental Health in Education Action Group (“MHiEAG”) would be set up. After work by officials and ministers on the remit and make-up of the group, details were formally announced by DfE on 9 March 2021 (Exhibit HS1/243 - INQ000514688). The group was led by MoSU and the Minister for Children and Families and included ministers from OGDs, representatives of mental health charities as well as the government’s youth ambassador and was intended to drive action on mental health support for all young people and staff in education, from nurseries to universities. The work of the HE Mental Health and Wellbeing Taskforce fed into discussions within MHiEAG.

Work around student mental health and wellbeing since the pandemic

- 5.48.16. Student Space has remained in place since the pandemic, with a report published in February 2022 commissioned by Student Minds finding that it had been well received by the sector (Exhibit HS1/244 - INQ000607650). Student Space received a funding commitment of £262,500 annually to continue to provide this online mental health support to all students in England and Wales until June 2025.
- 5.48.17. The funding for continuing to provide Student Space was part of £15 million, which DfE asked the OfS to allocate towards developing mental health and suicide prevention strategies in 2023/2024. This funding was also used to give additional support for those making the transition from school or college to

university, in particular through counselling services. The £15 million is in addition to £10 million that OfS provided in 2023/24 to support student mental health and hardship.

5.48.18. DfE appointed Professor Edward Peck as Higher Education Student Support Champion in May 2022 for a two-year term and extended the appointment for another year until 31 May 2025. Professor Peck chairs a Higher Education Mental Health Implementation Taskforce, which includes bereaved parents, students, mental health experts, charities and sector representatives. It aims to drive meaningful change in mental health practice, including by producing best practice around “*Compassionate Communication*” with students, developing a framework on mental health learning and development for non-clinical staff, and exploring HE and NHS mental health partnerships. It published its first stage report in January 2024 and its second stage report in December 2024 (Exhibit HS1/245 - INQ000607678).

5.48.19. DfE also asked HEPs to take a whole university approach to mental health by setting a target for all universities to sign up to the University Mental Health Charter Programme by September 2024. To support this target OfS provided £400,000 additional funding to Student Minds to support expansion of the Programme. 113 HEPs have now joined this programme, covering 90% of all HE students in England.

5.48.20. DfE has made £281 million of student premium and mental health funding available to providers for the 2024/25 academic year to support successful outcomes for students, including for disadvantaged students.

Student suicide prevention

5.48.21. In addition to the activity around student mental health and wellbeing detailed in the paragraphs above, which by its nature aimed to help prevent student suicide, DfE also took forward specific work focussed on this area during and then after the COVID-19 pandemic period.

5.48.22. On 28 June 2021, MoSU chaired a HE Suicide Prevention round table meeting, attended by the OfS, UUK, HE sector organisations, HEPs and charities, as well as bereaved families. This meeting recognised that the COVID-19 period had been an unprecedentedly difficult time for students. In

bringing together charities, experts and bereaved families, it aimed to look at the additional practical steps HEPs could take to prevent student suicide and improve the government's understanding and response to this issue. Following the meeting, actions included that MoSU would write to Vice Chancellors to outline expectations in relation to their role in suicide prevention and that OfS would coordinate a set of case studies and resources to support the Suicide Safer Universities Framework (Exhibit HS1/246 – INQ000607608).

5.48.23. In September 2023, DfE also appointed a suicide research unit overseen by Professor Sir Louis Appleby CBE to conduct a *national review of higher education suicides* (Exhibit HS1/247 - INQ000607651). There has been a very high level of engagement with this review by the HE sector, with the Higher Education Mental Health Implementation Taskforce having a role in securing sector input. This review will ensure that universities are learning from tragic instances of suicide, and that these lessons are shared widely across the sector. Ultimately the aim is to prevent further tragedies, and the review will report findings in spring 2025.

5.48.24. This work on suicide prevention was undertaken as part of the package of work to support student mental health, rather than because of any increase in student suicides. To give some context, the latest data available shows that for the academic year ending 2017 to academic year ending 2020 the overall suicide rate in the general population (which includes HE students) is statistically significantly higher (12.5 deaths per 100,000 general population) compared with students (3.9 deaths per 100,000 students) for the academic year ending 2017 to academic year ending 2020 (Exhibit HS1/248 - INQ000607734).

5.49. *Paper on higher education settings*, February 2021 as an update to the paper *Principles for managing SARS-CoV-2 transmission associated with higher education* from September 2020

5.49.1. The Inquiry has asked about the Children's Task and Finish Group paper, *Paper on higher education settings*, from February 2021, which was provided as an update to the September 2020 paper *Principles for managing SARS-CoV-2 transmission associated with higher education*. The Inquiry has asked whether the impact of online learning on young people was considered and what measures were recommended to mitigate levels of lower wellbeing, along with

whether any assessment of the measures recommended in the September 2020 paper had taken place.

5.49.2. As set out in paragraphs 5.22.1 to 5.22.6 of this statement above, following the September SAGE meeting, DfE published updated and amended guidance and information for HEPs to ensure that they were able to reopen to students safely. In doing so, the department drew on the expertise of the DfE Higher Education Taskforce and worked closely with HEPs to ensure that they got to the point where they could reopen once again to students and ensure that students could return to campus and face-to-face teaching. Where students did move to online learning later on in the autumn of 2020, this was to facilitate the move home for students for the Christmas break and make it as safe as possible.

5.49.3. As mentioned in paragraphs 5.35 to 5.45 of this statement above, following the Christmas 2020 break, the government ensured that a significant proportion of HE students studying in key employment areas such as medicine and other health-related disciplines returned to face-to-face teaching. DfE then worked to ensure that different cohorts of students were able to return to face-to-face teaching as quickly as possible.

5.49.4. GO-Science led on coordinating the drafting of the paper, *Paper on higher education settings*. DfE provided comments and agreed the text as described above for the paper, in September 2020. DfE was also able to suggest amendments to the paper following the SAGE meeting and before the paper was published. Through this process, DfE was able to ensure that when published, the paper included evidence about the effectiveness of mitigation measures, as well as detail on the negative impact on mental health and distress for students of not being on campus (Exhibit HS1/249 – INQ000607570). DfE then ensured that this message was included in updated DfE guidance for HEPs (Exhibit HS1/250 - INQ000607730), published on 24 February 2021, shortly after SAGE published the *Paper on higher education settings*.

5.49.5. The updated guidance to HEPs included the evidence collated by the Children's Task and Finish Group/SAGE that showed that limited, anecdotal evidence from 10 universities suggested that minimal cases of transmission

were attributed to face-to-face learning, and that based on recent ONS data, the risks to HE staff were similar to those for most other occupations.

5.49.6. DfE was also clear in the guidance that it had prioritised the return to face-to-face teaching for students at the beginning of term in January 2021 on courses which had to be delivered face-to-face, and which supported the pipeline of future critical key workers. The guidance set out that it was now advising providers that they could resume face-to-face teaching for students who were studying practical or practice-based subjects and required specialist equipment and facilities from 8 March 2021.

5.49.7. Decisions had been taken across government on the pace and order in which any changes which would involve more social mixing, including the full reopening of educational settings, could occur. DfE prioritised the return of younger children to face-to-face education over HE students because older students were better equipped to respond to online learning than younger students. This is why HEPs were not advised to return all students to face-to-face learning, instead particular cohorts were prioritised. These decisions were also affected by the debates, as set out in paragraphs 5.35 to 5.40 above, about whether students were driving transmission of the virus. As discussed in paragraphs 5.35 to 5.40, it was the view of DfE that there was no clear evidence of this.

February 2021 to June 2022

5.50. After the cohort of students on specific priority courses (see paragraph 5.41) returned to campus in January 2021, DfE focussed on the students still using online learning to complete their courses.

5.51. As part of the return of students in January 2021 following the Christmas break, DfE began working with HEPs to monitor how many students were studying through blended or online learning, as well as occupancy rates on campuses. This information was used in regular updates to DfE ministers and senior officials.

5.52. Monitoring during January and February 2021 showed a gradual increase in the number of students returning to university accommodation, as set out in the table below, which shows percentages of students in each type of university accommodation. It should be noted that this was an estimation as data was not provided by all HEPs and that providers had flagged that they had low confidence in

their ability to accurately report the number of students resident at that point (Exhibit HS1/251 – INQ000607567).

Table 1: Percentages of students in each type of university accommodation

Term-time accommodation type	Proportion of students known to be currently resident as of 06 January (RAG RED) 52 Respondents	Proportion of students known to be currently resident as of 13 January (RAG RED) 72 Respondents	Proportion of students known to be currently resident as of 20 January (RAG RED) 86 Respondents	Proportion of students known to be currently resident as of 27 January (RAG RED) 91 Respondents	Proportion of students known to be currently resident as of 03 February (RAG RED) 94 Respondents
Provider maintained	14%	22%	28%	33%	34%
Private halls	9%	6%	15%	16%	20%
Other private or rented	14%	13%	12%	13%	13%

5.53. On 3 February 2021, providers also reported that 17% of students were in blended learning (i.e. a combination of online and face-to-face) and 83% were in online learning.

5.54. At Education Gold on 11 February 2021, a meeting organised and run by the CO's COVID-19 Taskforce, it was agreed that students on priority practical HE courses, who were at risk of being unable to complete their courses, would return to campus between 8 to 21 March 2021 so face-to-face teaching could resume (Exhibits HS1/252 – INQ000075534 and HS1/253 - INQ000075537). MoSU sent this information in a letter to students on 22 February 2021 (Exhibit HS1/254 - INQ000641601) and it was also included in an announcement by the Prime Minister on the roadmap (Exhibit HS1/255 - INQ000075711). This noted that the options for the remaining students would be reviewed before the Easter break.

5.55. In early March 2021, DfE began the review. It considered three return dates (12 April, 17 May or 21 June) based on four criteria: public health, economic and financial, educational recovery and wellbeing, and legal and reputational. DfE worked closely with HMT, CO and the SPI-M and SAGE secretariats to fully represent all evidence (Exhibits HS1/256 - INQ000607579 and HS1/257 -

INQ000607577). A series of review meetings took place throughout March and early April.

- 5.56. On 25 March officials discussed with MoSU (Exhibit HS1/258 - INQ000607582) that the April date was unlikely to be agreed due to the transmission risk and MoSU therefore agreed DfE should aim for full HE reopening to be included in Step 3 of the COVID-19 roadmap (17 May 2021). On 30 March DfE officials tested the plan to include HE reopening as part of Step 3 with SSE in a note and SSE agreed with the approach. A review meeting was held with colleagues across government on 7 April 2021. Based on the evidence presented in the review slide pack, the review group agreed to recommend a return alongside Step 3 from 17 May 2021.
- 5.57. This approach was confirmed to SSE on 7 April 2021 (Exhibit HS1/259 - INQ000607583) and SSE then sent a letter to the Prime Minister outlining the primary options considered. A full return in April was deemed not to be viable due to the wider epidemiological landscape and risks, a full return in May would balance health, education, and economic implications, while a full return in June would only affect a small number of students, with many having already graduated or left their term-time accommodations (Exhibit HS1/260 - **INQ000595180**).
- 5.58. On 13 April 2021 the government announced that all remaining HE students would return to campuses no earlier than 17 May 2021 (Exhibit HS1/261 - INQ000607667), aligning with Step 3 of the government's roadmap, which was *"designed to maintain a cautious approach to the easing of restrictions, to ensure that we can maintain progress towards full reopening"*. This was covered in a letter from MoSU to HEPs (Exhibit HS1/262 - INQ000607590) and to students (Exhibit HS1/263 - **INQ000641602**) on 13 April 2021, saying mental health and wellbeing remained her priority. The letter described the mental health support being made available via Student Space, in addition to the £15 million of hardship funding (£20 million having been awarded in December 2020 (Exhibit HS1/224 – INQ000607562) already committed to student mental health initiatives.
- 5.59. The number of students in face-to-face learning continued to gradually increase and on 29 April 2021, HEPs reported that for the start of the upcoming spring term they were expecting 75% of students to be in online learning, 21% to be in blended learning (i.e. a combination of face-to-face and online) and 5% to be in placements (Exhibit HS1/264 – INQ000607592).

- 5.60. On 10 May 2021, MoSU confirmed via a letter to HEPs (Exhibit HS1/265 - INQ000607597) and to students (Exhibit HS1/236 - INQ000607596) that as of 17 May 2021, there would no longer be any restrictions to the face-to-face teaching of students on non-practical courses.
- 5.61. The proportion of HE students in face-to-face study (including students on placement) continued to increase in the summer term 2021. The proportions of students occupying provider maintained and private halls fell during the Easter break (although the small size of the decrease suggested most students present chose to remain in their term-time accommodation) but had increased by 2 June 2021 to the highest level reported during the pandemic period, with 77% of students estimated to be resident in their term time accommodation. On 2 June 2021, DfE estimated that the proportion of students with an element of face-to-face learning was 39%, of which 6% were on placement (Exhibit HS1/266 – INQ000607599).
- 5.62. Along with prompting and ensuring the return of students to campus, DfE supported students by jointly publishing the *Graduate employment and skills guide* with the OfS. In collaboration with UUK, the Association of Graduate Careers Advisory Service, and the Institute of Student Employers, this package was to support graduates entering the labour market (Exhibits HS1/267 – INQ000607598, HS1/268 – INQ000607593 and HS1/269 - INQ000607746). This graduate support package addressed the following risks: qualifications from that year being seen as less credible, graduates lacking the right skills for employment, and the lack of opportunities available for graduates to add experience to their CV (Exhibit HS1/270 – INQ000607581). This followed concerns raised by MoSU over the opportunities graduates would have due to the disruption caused to their learning (Exhibit HS1/271 - INQ000607568).
- 5.63. Further work on testing was also done over this period. In MoSU's letters to students and HEPs on 13 April 2021 and 10 May 2021 on the return to campus (see paragraphs 5.58 and 5.60), MoSU reiterated the importance of the asymptomatic testing programme (utilising LFD testing) and its availability to staff and students. On 15 June 2021, MoSU confirmed to HEPs that the programme would be extended to at least 31 July 2021 and testing arrangements for August and September were being considered for those students and staff at HEPs over the summer (Exhibit HS1/272 - INQ000497863). Between 15 July 2021 to 21 July 2021, 45,516 LFD tests had been taken as part of testing in HE (Exhibit HS1/273 - INQ000607735).

- 5.64. On 24 June 2021, DHSC subsequently agreed for testing in HE settings to continue over summer 2021 (Exhibit HS1/274 – INQ000607603), which DfE communicated to the HE sector (Exhibits HS1/275 – INQ000607604, HS1/276 – INQ000607605 and HS1/277 – INQ000607606). It was then agreed by Covid O on 2 July 2021 that all students returning in autumn 2021 would be expected to take two LFD tests, three to four days apart, as soon as possible, until the end of September 2021. At that point it was expected that vaccinated individuals would not be required to test asymptotically from September onwards, so staff at HEPs would likely not need to be part of the HEP asymptomatic testing programme for the next academic year (Exhibit HS1/278 - INQ000497782).
- 5.65. Plans for COVID-19 testing in educational settings over Christmas, including HEPs, were announced on 26 November 2021 in the DfE daily sector bulletin (Exhibit HS1/279 - INQ000497807). On 21 February 2022, education and childcare settings, including HE, were informed of the end of regular asymptomatic testing in mainstream settings, also via the daily sector bulletin (Exhibits HS1/280 - INQ000075657 and HS1/281 – INQ000497830).
- 5.66. In addition, HE operational guidance was updated throughout this period, to reflect the changes in government policy at the time (please see Annex A for further details on updates to the HE COVID-19 operational guidance). This included responding to the introduction of Plan B of the winter plan in December 2021, the guidance advising providers to continue with face-to-face teaching and learning, recommending the use of face-coverings, and noting the importance of the outbreak management plans and the participation in mass testing and vaccination programmes.
- 5.67. DfE also updated guidance in response to the government's plan for 'living with Covid' in February 2022, highlighting the importance of providers continuing with face-to-face teaching and learning and noting that face coverings were no longer advised but that providers should continue to conduct risk assessments including ensuring spaces were well-ventilated and had contingency/outbreak management plans still in place.
- 5.68. The HE COVID-19 operational guidance was withdrawn on 1 April 2022, replaced by broader DfE guidance on emergency planning and by UK Health Security Agency ("UKHSA") guidance on health protection in education and childcare settings (Exhibits HS1/282– INQ000607727 and HS1/283 - INQ000607712).

5.69. The Inquiry has asked for more specific details on certain events during this time period. These are covered in the sections below:

5.70. **Admissions 2021**

5.70.1. Following the use of CAGs in August 2020 (see section Grade Calculations in August 2021 above in this statement), DfE focussed on exams and admissions for summer 2021. Following the decision to cancel exams for the end of the academic year 2020/2021, on 25 February 2021, SSE and Ofqual announced that students in England would receive A level grades determined by teachers – teacher assessed grades (“TAGs”) (Exhibit HS1/284 - INQ000507111). This announcement followed a joint consultation by DfE and Ofqual, which they used to shape the alternative arrangements to exams (Exhibit HS1/285 - INQ000507112). This meant that HEPs had an indication of the process and timescale for how grades would be awarded in 2020/2021, so they could plan accordingly and make offers on that basis.

5.70.2. However, DfE remained concerned around oversubscription on competitive courses, particularly medicine and dentistry which were subject to number caps. The majority of medicine interviews had already taken place and conditional offers had been made to students before the announcement that TAGs would be used. HEPs had long standing, well evidenced formulas for predicting the number of students whose predicted grades would convert into actual grades, and they have always made more offers than the number of available places to ensure that each course is full but not oversubscribed. TAGs were an unknown entity and it was likely that grades would be higher than in an exam scenario.

5.70.3. As set out in a note provided to MoSU on 21 May 2021 (Exhibit HS1/286 – INQ000607731), oversubscription formed part of the department’s planning for a variety of scenarios that could arise in the weeks and months leading up to results being announced in August 2021. DfE had worked through the issue of 600 of the 2019/2020 cohort of students that had deferred their medicine and dentistry places to start in 2021/2022. Without raising the cap on places on these courses for 2021/2022, there would be 600 fewer places available for the new cohort of students. As a result, DfE ministers and officials worked with DHSC, HMT and No.10 to agree that the cap would also be raised for the 2020/2021 cohort, before returning to normal for 2021/2022. The note flagged

that HMT were unlikely to provide funding to accommodate additional students in 2021 having already done so in 2020.

5.70.4. In May and early June 2021, UCAS developed various oversubscription scenarios based on the proportion of predicted grades that might convert to actual grades. DfE then reviewed the UCAS scenario analysis and compared it to the Ofqual aggregate TAGs data to identify which scenario was most likely. This reinforced the concern around oversubscription so DfE, UCAS and Ofqual officials took forward a series of conversations around how UCAS offer data could be matched with Ofqual/Joint Council for Qualifications grade data, to get a precise assessment of the impact for HE admissions of the actual A level grades. During the first half of July, DfE worked with Ofqual and UCAS to put in place a data sharing agreement so that Ofqual could share data on TAGs then, rather than just before grades were awarded in August, as would normally happen (Exhibits HS1/287 - INQ000607612, HS1/288 - INQ000607610, HS1/289 - INQ000607609 and HS1/290 - INQ000607607). This would allow UCAS to provide DfE with a list of providers and courses that were oversubscribed based on actual pupil grades and offers.

5.70.5. On 13 July 2021, Health Education England (“HEE”), then the national leadership organisation for education, training and workforce development in the health sector, shared with DfE, DHSC and the OfS, the results of surveys it had conducted of medical and dental schools’ predictions around over-recruitment in 2021. Although heavily caveated, this further reinforced concerns about oversubscription on these courses as it showed that 10 medical schools predicted an over-recruitment. Following this, HEE did further modelling which showed an additional five providers were likely to also over-recruit (Exhibit HS1/291 - INQ000607613).

5.70.6. On 23 July 2021, UCAS shared their data on the number of students who had met the terms of their firm offer by provider. In a worst-case scenario, where all firm offers converted into acceptances (i.e. where all students accepted their firm choice and none deferred), a number of HEPs would be oversubscribed, including in medicine and dentistry.

5.70.7. On 23 July 2021, DfE officials sent a submission to SSE (Exhibits HS1/292 - INQ000607621, HS1/293 - INQ000607622, HS1/294 - INQ000607623,

HS1/295 - INQ000607624, HS1/296 - INQ000607625 and HS1/297 - INQ000607626) recommending that he:

- 5.70.7.1. note DfE's overall plan for policy development to mitigate admissions risks in 2021.
- 5.70.7.2. agree DfE's proposed negotiating strategy on raising student number caps for medical students for 2021.
- 5.70.7.3. agree the action DfE officials were taking to encourage medical and dental schools to work together to support students to transfer to another provider where appropriate.
- 5.70.7.4. agree a 'backstop' proposal to allow DfE to share limited, provider specific data on oversubscription with key oversubscribed HEPs by issuing non-disclosure agreements ("NDAs"), as some providers were not engaging with DfE in putting the necessary contingency plans in place. Issuing NDAs to HEPs would enable DfE to set up ministerial conversations with them where data on their exposure to oversubscription could be shared ahead of the time, to allow them to make necessary contingencies, including finding extra accommodation and staff.

5.70.8. On 27 July 2021, SSE's private office confirmed that SSE had noted the plans and agreed to the proposals (Exhibits HS1/298 - INQ000607620).

5.70.9. On the same day, 27 July 2021, DfE senior officials also met SSE and MoSU to discuss the issues set out above (Exhibit HS1/299 - INQ000607627). As set out in the note of the meeting, SSE asked DfE officials to develop a package that included:

- 5.70.9.1. an uplift in the SPG (a government funding stream designed to support universities in covering the costs of teaching higher-cost subjects and specific project) for medical school places.
- 5.70.9.2. lifting the current medical and dental school caps.
- 5.70.9.3. introducing a financial support package for HEPs to help them manage and incentivise deferrals for medicine and other capital-intensive subjects.

- 5.70.10. Following further work, on 30 July 2021, DfE officials shared a note with No.10 setting out the different work strands and options around how to address oversubscription, including potential costs (Exhibits HS1/291 - INQ000607613 and HS1/300 – INQ000607628).
- 5.70.11. On the same day, DfE officials met officials from No.10, CO, HMT and DHSC to discuss this (Exhibit HS1/301 - INQ000607629). Actions from the meeting included:
- 5.70.11.1. based on confirmation from medical and dental schools, DfE would confirm the maximum number of additional places available in the system in 2021/2022 and therefore the maximum number by which the caps should be raised.
 - 5.70.11.2. DfE would continue to work with DHSC/HEE colleagues to build the data picture on medical and dentistry offers and explore the option of whether a brokering process could be put in place to encourage and help students to move between providers.
- 5.70.12. Also on 30 July, DfE officials sent a submission to SSE setting out options around medical and dental school brokering. On 4 August 2020, SSE's private office replied that he agreed that the department should enhance current brokerage arrangements with financial incentives for students to move to a different HEP, with DfE funding 80% of costs and providers funding 20% (this split was later revised to 65% and 35% respectively), and that DfE should stand up a brokerage helpline.
- 5.70.13. At the same time as the note that DfE provided to No.10 on 30 July 2021, DfE officials also agreed and provided slides for SSE to use at a meeting with the Prime Minister on exams and oversubscription (Exhibit HS1/302 - INQ000607732) on 3 August 2021. DfE officials also continued to work with HMT on the potential costs to government and how this funding would be provided (Exhibits HS1/303 - INQ000607634 and HS1/304 - INQ000607632).
- 5.70.14. On 3 August 2021, the meeting with the Prime Minister took place. The readout from this meeting included that the Prime Minister (Exhibit HS1/305 – INQ000607633):

- 5.70.14.1. welcomed agreement for DfE to fund an increase of up to £10m to the SPG to incentivise HEPs to take on more students this year.
- 5.70.14.2. agreed that DfE should use a brokerage fund to move as many students as possible from oversubscribed to undersubscribed medical and dentistry courses.
- 5.70.14.3. agreed that the government should lift the cap on medical school places in academic year 21/22 as much as possible.
- 5.70.14.4. agreed that medical and dental schools should absorb deferred places in academic year 22/23.
- 5.70.15. On 6 August 2021, MoSU wrote to heads of medical and dental schools (Exhibits HS1/306 - INQ000607635 and HS1/307 - INQ000607636). This letter set out that:
 - 5.70.15.1. the government had adjusted the cap on medical and dental school places.
 - 5.70.15.2. medical and dental schools with unfilled places should consider not drawing from their waiting lists until 08.30 am on Tuesday 17 August and instead support the government's brokerage programme to offer places to students that had met the conditions of their offer and held a firm or insurance offer and could not yet be accommodated.
 - 5.70.15.3. DfE proposed to support students who wished to change by offering £10,000 funding to do so – with government contributing 65% of the cost and the oversubscribed institution providing 35%.
 - 5.70.15.4. the government would provide up to £10m of additional funding for the SPG through the OfS. The government had asked OfS to prioritise supporting medicine, dentistry, veterinary sciences, nursing and other healthcare courses, as well as laboratory-based subjects.
- 5.70.16. On 10 August 2021, students received their A level grades. With the two adjustments that the government made to the caps on medical and dental school places in May and August 2021, this saw the cap raised to 8,032 (Medicine) and 933 (Dentistry) in May 2021, and a further 368 (Medicine) and 88 (Dentistry) for home students in August 2021. The DfE's brokerage scheme

incentivised more than 80 students to move from oversubscribed providers into schools with capacity. In September 2021, DfE officials began to plan for the 2021/2022 academic year on the basis that no further raising of caps would take place (Exhibits HS1/308 - INQ000607644 and HS1/309 – INQ000607645).

5.70.17. DfE continued to undertake detailed daily monitoring in the days and weeks immediately following the publication of A level grades, across all courses. DfE officials met with CO Economic and Domestic Affairs Secretariat (“EDS”) colleagues daily across this period, to report on progress made. On 12 August 2021, the update from DfE to EDS noted that 2021 had been a record year for HE admissions not just in terms of the number of applications, but also in terms of those who had been accepted onto university courses (Exhibits HS1/310 – INQ000607637 and HS1/311 – INQ000607639).

5.70.18. According to UCAS data, acceptances in 2021 were down 8,415 (1.5%) compared to 2020 but up 20,820 and 3.8% compared to 2019. Like in 2020, there was a difference between tariff groups. In 2021, the only increases were at high tariff providers (up by 14.7% from 2019 and by 1.3% from 2020). Medium and low tariff providers saw decreases in 2021 with medium tariff providers down by 0.1% on 2019 and by 3.7% on 2020 and low tariff providers down by 0.8% on 2019 and by 1.9% on 2020 (Exhibits HS1/312 - INQ000607733 and HS1/167 - INQ000607756). At the end of the 2021 admissions cycle, 24.7% of applicants were unplaced, an increase from 21.1% in 2020 but not too dissimilar to previous years (which ranged between 21.1% and 29.4% over the 2006 to 2024 period).

5.71. Outbreak management

5.71.1. As well as working on admissions DfE also worked with HEPs on outbreak management plans. Previously, in Covid O on 3 September 2020 (see paragraph 5.18), it was agreed that HEPs should send DfE a copy of their outbreak management plans, so DfE could work with the sector to monitor these plans and share good practice and intelligence. On 8 September 2020, MoSU sent a letter to HEPs requesting their existing plans and DfE produced a best practice document at the end of September 2020 (Exhibits HS1/313 – INQ000607526, HS1/314 – INQ000607527 and HS1/315 - INQ000607528).

5.71.2. In August 2021, DfE, alongside PHE, UUK and UKHSA, led a webinar for HEPs on outbreak management plans and local partnerships in HE (Exhibit HS1/316 - INQ000607660). This was in order for DfE to assess the preparedness of the HE sector over summer 2021. As the year before, on 8 September 2021 DfE officials asked all HEPs to send their outbreak management/contingency plans to their local Directors of Public Health, copying in DfE officials, by 30 September 2021 (Exhibit HS1/317 - INQ000607655).

5.71.3. Following this, DfE officials worked with the HE sector (UUK, the Universities and Health Association) and UKHSA to deliver webinars in September and October 2021 to HEPs and local health teams to inform outbreak management planning in light of the government's winter plan (Exhibits HS1/318 - INQ000607659 and HS1/319 - INQ000607658). Outbreak management plans were key documents detailing how education settings would reintroduce any measures, including NPIs, employed during the pandemic to minimise the disruption to face-to-face education and protect those vulnerable to COVID-19 (Exhibit HS1/320 - INQ000519531).

5.72. Non-pharmaceutical interventions

5.72.1. The Inquiry asks specifically about the DfE's involvement in NPIs implemented at HEPs, and whether this was on an ad-hoc or ongoing basis. As autonomous institutions, HEPs were responsible for implementing NPIs. DfE's role was in providing guidance to help HEPs apply the rules set for the population at large to their particular circumstances. As set out in the chapters of this statement above, DfE communicated frequently with HEPs about recommended NPIs via published guidance, letters to students and staff, and meetings with HEPs. Specifically, this includes the communications detailed on restricting face-to-face teaching (see paragraph 4.32), testing (see paragraph 5.26), face coverings and social distancing via the HE operational guidance (at para 5.66), data reporting (see paragraph 5.30) and the use of outbreak management plans (see paragraph 5.71.1).

5.72.2. DfE took advice from PHE on NPIs throughout the pandemic, working with them to update guidance. For example, in December 2020 new face coverings advice was added to DfE guidance, increasing the use of them due to the increase in prevalence of COVID-19 (Exhibits HS1/321 - INQ000075510 and HS1/322 - INQ000075509). This was further amended in February 2021, with

the introduction of face coverings in university lecture halls on PHE's advice (Exhibit HS1/323 - INQ000075541), with the requirement for face coverings being removed in May 2021, again working with PHE on this guidance (Exhibits HS1/324 - INQ000075561, HS/325 - INQ000075562 HS1/326 - INQ000075570 and HS1/327 - INQ000075571).

5.73. Student perspectives

5.73.1. The Inquiry has also asked about how DfE engaged with students during the specified period and DfE's duty to monitor student perspectives. As covered in the section above, along with the regular contact with the HE sector via letters and blogs, DfE also did the same with students (see paragraphs 5.21.5.1, 5.32, 5.43, 5.54, 5.58 and 5.60). In terms of DfE's duty, as outlined in paragraph 2.7, in the Higher Education Act 2004, DfE designated the OIA for reviewing complaints made by students to their HEP. During the specified period, DfE prioritised the mental health and wellbeing of students, particularly in self-isolation, by establishing the HE Mental Health and Wellbeing Taskforce and ensuring, in May 2021, that students returned to face-to-face learning after a period of online learning due to national restrictions.

5.73.2. DfE also engaged with NUS to support students and address key challenges posed by the pandemic, such as a survey in November 2020 on student experiences of teaching and learning that term (Exhibits HS1/328 - INQ000607576, HS1/329 - INQ000607602, HS1/330 - INQ000607563 and HS1/331 - INQ000607563). DfE also used survey data on university students gathered by YouGov on behalf of the CO in December 2020, looking at student concerns as well as vaccine and testing uptake (Exhibit HS1/332 – INQ000607561). In addition, DfE worked with the OfS on a series of FAQs for students on traveling during the 'student travel window' in December 2020, as well as the OfS student panel helping to understand the perspective of students during the COVID-19 pandemic (Exhibits HS1/333 – INQ000607550 and HS1/334 – INQ000607757). DfE also heard directly from students, for example via live Q&A events, such as the one hosted by the Student Room and attended by MoSU in April 2020 (Exhibit HS1/335 – INQ000607463).

6. Monitoring and assessment of impact

6.1. The Inquiry has requested DfE to set out any analysis undertaken, either during the specified period or since, on the impact COVID-19 had on young people in five key areas.

6.2. This section examines trends before, during, and after the COVID-19 pandemic. However, it does not attribute these trends solely to the impact of COVID-19. Other factors, such as broader economic and societal changes, as well as existing underlying trends, may have also influenced the data observed during this period.

6.3. COVID-19 may have impacted students in 3 distinct ways depending on the stage of their studies;

6.3.1. prospective students applying to HE saw the cancellation of exams and alternative assessment arrangements which led to increased uncertainties in the admissions process.

6.3.2. students in HE were impacted by closures and changes to teaching methods (i.e. to online rather than face-to-face).

6.3.3. students graduating from HE were entering a different labour market compared to previous cohorts.

6.4. Throughout the pandemic, DfE was actively monitoring student wellbeing and mental health, as set out in the mental health and wellbeing of young people section above in this statement (from paragraph 5.48). During that time, the monitoring assessed the impact COVID-19 was having on young people in HE and in response, DfE implemented measures to mitigate these effects. In the years since the pandemic, the analysis has turned to the impacts on a wider range of areas, as outlined below.

6.5. Throughout this section there are some terms used that are defined here for ease of reference:

6.5.1. Domicile – refers to the country that a person treats as their permanent home, or lives in. This is the place where a student normally lived for non-educational purposes before starting their course. The data presented here is predominantly for domiciles. Where this is not possible due to data availability, we specify if it is UK domiciled or English domiciled students.

6.5.2. Participation of Local Areas (“POLAR”) - is a classification system used by DfE, UCAS, OfS and other organisations to group areas across the UK based on the proportion of young people who participate in HE. It measures the POLAR and categorises local areas/neighbourhoods into five groups, or quintiles, based on the rate at which young people aged 18 or 19 enter HE. POLAR helps to highlight disparities in HE participation across different regions, aiding in the development of policies and initiatives to address these inequalities.

6.5.2.1. Quintile 1: Areas with the lowest participation rates

6.5.2.2. Quintile 5: Areas with the highest participation rates

6.5.3. Index of Multiple Deprivation (“IMD”) - is a measure used by DfE and the OfS to assess the relative deprivation of areas across the UK. It combines information from various domains, such as income, employment, education, health, crime, housing, and the living environment, to create an overall deprivation score for each area. The IMD is often used to identify and support students from disadvantaged backgrounds, ensuring that HEPs can target resources and initiatives effectively to promote equality and access.

6.6. The main sources of data DfE used to monitor impact that will be discussed in this section are:

6.6.1. Higher Education Statistics Agency (“HESA”) - the designated data body responsible for collecting, analysing, and publishing data about HE in the UK. The data used in the following sections focusses on:

6.6.1.1. Entrants – these are students who enter HE for both undergraduate and postgraduate courses.

6.6.1.2. Enrolments – these are the total number of students across all years of study.

6.6.1.3. Declared mental health condition.

6.6.2. UCAS data covers exclusively applications and acceptances for full-time undergraduate courses through the Universities and Colleges Admissions Service. It should be noted that not all HE providers utilise UCAS, and the data

coverage is lower for international students, with approximately 60% of entrants from outside the European Union ("EU") applying through UCAS.

6.6.2.1. For individuals residing in England, Wales, and Northern Ireland, UCAS data covers the vast majority of all full-time undergraduate provisions.

6.6.3. Longitudinal Education Outcomes ("LEO") - this data is a linked dataset developed by DfE. It links individuals' education data with their employment, benefits, and earnings data to provide insights into the long-term outcomes of education.

6.6.4. SLC – publish information on student loan outlays, repayments and borrower activity for students studying in HE and FE in the UK and EU.

6.6.5. The OfS - publish data on students and providers, with a particular focus on data related to student outcomes.

6.6.6. Survey and research study evidence from DfE commissioned research and externally published data and research during the period. Notably:

6.6.6.1. Longitudinal Survey of Young People in England ("LSYPE") 1 and LSYPE2 - major cohort studies of young people run by UCL Institute of Education and DfE respectively. The studies cover a wide range of topics, including educational experiences, health, future plans and employment, providing a comprehensive view of young people's lives and the role of education within them. Mental health is measured by the General Health Questionnaire 12 ("GHQ12"), which is a psychometric scale measuring common mental health problems.

6.6.6.2. ONS COVID-19 HE Students Insights Surveys ("SCIS") in England which provided experimental statistics during the COVID-19 pandemic, including on subjective mental health and wellbeing of HE students.

6.6.6.3. Student Academic Experience Annual Surveys ("SAES") produced by HEPI and Advance HE.

6.6.6.4. DfE Survey of HE Providers Policies and Practices to support student mental health.

Higher education applications, acceptances and entrants

Applications and acceptances

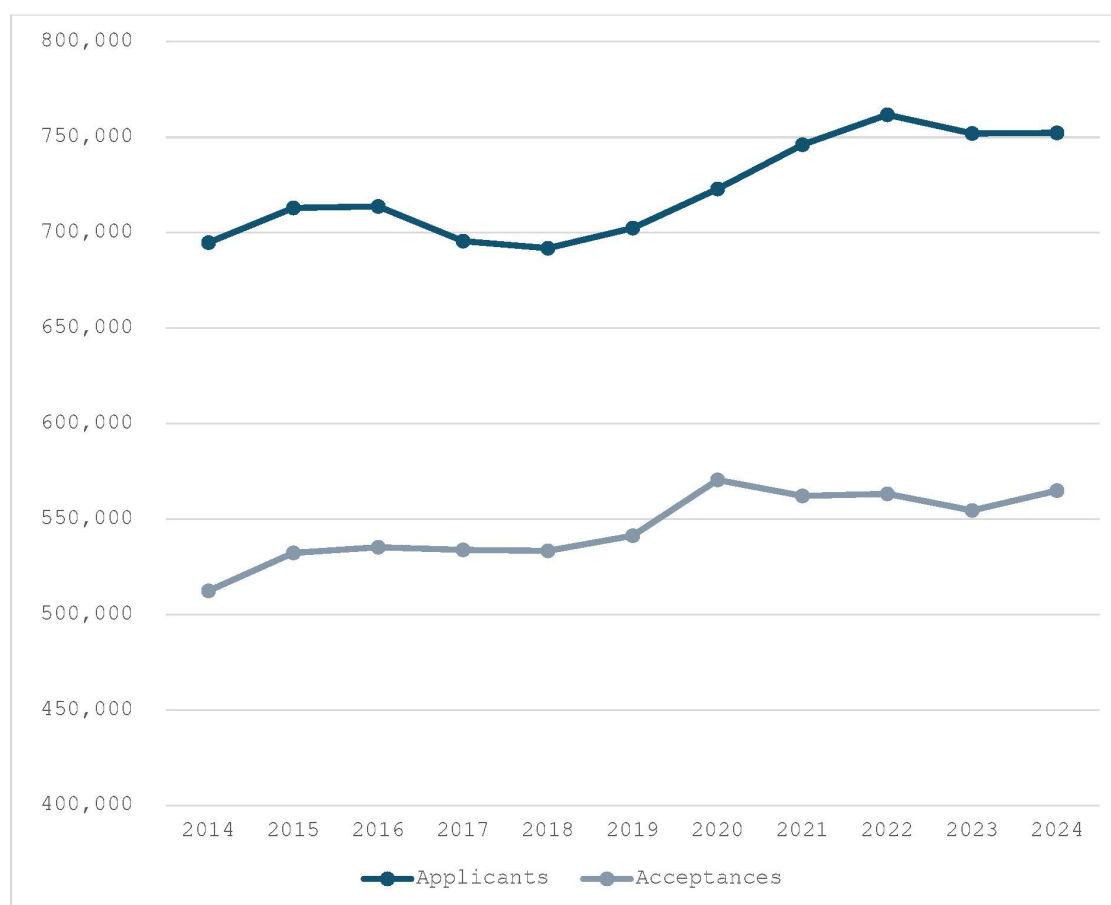
6.7. Applications and acceptances to HE are monitored via UCAS data for those using the Universities and Colleges Admissions Service. This data covers full time undergraduate courses only and has partial coverage for international students. Not all providers utilise UCAS. Table 2 and graph 2a below show that during the COVID-19 pandemic, there was a high demand for student places with HE applicant numbers increasing in both the 2020 and 2021 application cycles. Applicant numbers remain above pre-pandemic levels and have continued to increase in line with the growth trends seen before the COVID-19 pandemic. Acceptances onto courses also followed the same broad trend as applicants, peaking in 2020.

6.8. This increase in acceptances was in part driven by the introduction of CAGs in August 2020 (please see the Grade calculations in August 2020 section of this statement, paragraph 5.21). This meant more students met the terms of their offer, leading to a higher number of students within HE. This was coupled with a change in applicant demand for HE during the COVID-19 pandemic, with a large increase in applications linked to healthcare subjects (nursing, medicine and dentistry).

Table 2: UCAS admissions data on applicants and acceptances (all domiciles).

	2019	2020	2021	2022	2023	2024
Applicants of all ages and domiciles (number & % change from previous year)	702,470	722,905 (2.9%)	746,120 (3.2%)	761,740 (2.1%)	752,025 (-1.3%)	752,210 (0.0%)
Acceptances of all ages and domiciles (number & % change from previous year)	541,240	570,475 (5.4%)	562,060 (-1.5%)	563,175 (0.2%)	554,465 (-1.5%)	564,940 (1.9%)

Graph 2a - UCAS admissions data on applicants and acceptances (all domiciles).



Higher education entrants

6.9. Entrants (or starts) to HE are covered in HESA data which includes those who apply through UCAS and those applying directly to HEPs and includes both undergraduate and postgraduate entrants. The HESA data will therefore differ from the UCAS data above which only shows trends in applications and acceptances to full-time undergraduate courses. There are also differences in the provider coverage between the two data sources.

6.10. Table 3 below shows that several cohorts of students saw particular increases in entrants. The number of female entrants to UK HE increased by 10.7% from 2019/20 to 2020/21. This compares to an increase of 9.3% in male entrants over the same period. There was a significant increase in mature entrants to UK HE during the COVID-19 pandemic. The number of entrants aged 25 to 29 grew by 20.6% and aged 30 and over by 20.7% from 2019/20 to 2020/21. More modest

growth was seen in younger ages: a 3.2% increase for entrants aged 20 and under and a 7.2% increase for 21 to 24 year olds.

6.11. 1. For entrants with known ethnicity, students in the 'Other' category (which includes Arab students, among others) had the highest proportional increase of 15.2% in entry to HE between 2019/20 and 2020/21. Over the same period, White entrants saw an increase of 13.2% and Black entrants saw the lowest proportional increase of 8.4%. However, since the COVID-19 pandemic, stronger proportional growth can be seen in Black entrants, as well as Asian, Mixed and 'Other' entrants. White entrants to HE have faced a proportional decline following the pandemic although, the overall number remains above pre-pandemic levels.

Table 3: HE student entrants (undergraduate and postgraduate and all domiciles) by personal characteristics, 2019/20-2023/24. (Source: HESA)

Student characteristics	2019/20	2020/21	2021/22	2022/23	2023/24
Sex					
Female (number & annual % change)	657,010	727,405 (10.7%)	738,845 (1.6%)	777,015 (5.2%)	746,800 (-3.9%)
Male (number & annual % change)	477,625	522,195 (9.3%)	540,740 (3.6%)	579,315 (7.1%)	566,160 (-2.3%)
Unknown (number & annual % change)	2,275	2,785 (22.4%)	3,790 (36.1%)	8,980 (136.9%)	5,725 (-36.2%)
Age group					
20 and under (number & annual change)	453,730	468,435 (3.2%)	465,405 (-0.6%)	477,825 (2.7%)	476,005 (-0.4%)
21-24 years (number & annual change)	301,760	323,590 (7.2%)	329,015 (1.7%)	339,120 (3.1%)	325,590 (-4.0%)
25-29 years (number & annual change)	141,445	170,560 (20.6%)	183,335 (7.5%)	205,225 (11.9%)	188,020 (-8.4%)
30 years and over (number & annual change)	239,855	289,565 (20.7%)	305,540 (5.5%)	343,060 (12.3%)	328,985 (-4.1%)
Age unknown (number & annual change)	120	240 (100.0%)	80 (-66.7%)	80 (0.0%)	90 (12.5%)
Ethnicity					
White (number & annual % change)	590,290	667,945 (13.2%)	643,540 (-3.7%)	603,680 (-6.2%)	593,430 (-1.7%)
Black (number & annual % change)	67,125	72,765 (8.4%)	71,700 (-1.5%)	73,530 (2.6%)	80,650 (9.7%)
Asian (number & annual % change)	94,510	106,045 (12.2%)	109,545 (3.3%)	109,825 (0.3%)	120,305 (9.5%)
Mixed (number & annual % change)	34,090	39,150 (14.8%)	40,325 (3.0%)	40,145 (-0.4%)	42,835 (6.7%)
Other (number & annual % change)	16,120	18,575 (15.2%)	20,180 (8.6%)	19,475 (-3.5%)	21,850 (12.2%)
Not known (number & annual % change)	17,625	21,305 (20.9%)	21,105 (-0.9%)	59,030 (179.7%)	31,050 (-47.4%)

Total students with a UK permanent address (number & annual % change)	819,760	925,785 (12.9%)	906,400 (-2.1%)	905,685 (- 0.1%)	890,125 (-1.7%)
Total (number & annual % change)	1,136,910	1,252,390 (10.2%)	1,283,380 (2.5%)	1,365,315 (6.4%)	1,318,685 (-3.4%)

6.12. Table 4 below indicates that participation in HE also widened during the pandemic period, with an increase in entrants from state-funded schools or colleges (Exhibit HS1/336 – INQ000607721). This data is only available for UK domiciled entrants. Participation for UK domiciled entrants from state-funded schools or colleges increased by 5.9% from 2019/20 to 2020/21. This compared to 4.5% growth in the number of UK domiciled entrants from privately funded schools. UK domiciled entrants from low participation neighbourhoods (based on POLAR) grew by 10.5% from 2019/20 to 2020/21. More modest growth was seen in entrants from other neighbourhoods of 8.3%. English domicile full-time entrants from the most deprived areas (based on IMD) increased by 11.4% from 2019/20 to 2020/21. Entrants from the least deprived areas grew by 6.2% (Exhibit HS1/336 – INQ000607721).

Table 4: UK domicile HE undergraduate student entrants by participation characteristics, 2018/19-2022/23. (Source: HESA)

	2018/19	2019/20	2020/21	2021/22	2022/23
State school marker					
Privately funded school (number & annual change)	34,785	34,610 (- 0.5%)	36,165 (4.5%)	35,055 (-3.1%)	35,835 (2.2%)
State-funded school or college (number & annual change)	390,040	391,875 (0.5%)	414,900 (5.9%)	421,985 (1.7%)	411,620 (- 2.5%)
Unknown or not applicable school type (number & annual change)	40,375	48,390 (19.9%)	64,830 (34.0%)	67,840 (4.6%)	82,880 (22.2%)
Low participation neighbourhood marker					
Low participation neighbourhood (POLAR4) (number & annual change)	52,965	55,815 (5.4%)	61,690 (10.5%)	64,585 (4.7%)	68,010 (5.3%)
Other neighbourhood (POLAR4) (number & annual change)	356,365	364,060 (2.2%)	394,315 (8.3%)	398,360 (1.0%)	401,970 (0.9%)

Unknown neighbourhood (POLAR4) (number & annual change)	2,115	1,975 (-6.6%)	1,780 (-9.9%)	3,350 (88.2%)	5,325 (59.0%)
English Indices of Deprivation (IMD)					
Quintile 1 – most deprived (IMD) (number & annual change)	77,955	83,365 (6.9%)	92,885 (11.4%)	98,695 (6.3%)	104,190 (5.6%)
Quintile 2 (IMD) (number & annual change)	79,820	83,080 (4.1%)	92,760 (11.7%)	94,435 (1.8%)	96,585 (2.3%)
Quintile 3 (IMD) (number & annual change)	74,055	75,800 (2.4%)	82,940 (9.4%)	83,695 (0.9%)	85,295 (1.9%)
Quintile 4 (IMD) (number & annual change)	75,250	75,915 (0.9%)	81,045 (6.8%)	80,915 (-0.2%)	81,680 (0.9%)
Quintile 5 – least deprived (IMD) (number & annual change)	85,230	84,495 (-0.9%)	89,760 (6.2%)	90,605 (0.9%)	89,635 (-1.1%)
Unknown quintile (IMD) (number & annual change)	820	585 (-28.7%)	285 (-51.3%)	675 (136.8%)	170 (-74.8%)
Total (number & annual change)	465,200	474,875 (2.1%)	515,890 (8.6%)	524,875 (1.7%)	530,330 (1.0%)

6.13. As outlined in the Grade Calculations in August 2020 section above in this statement (from paragraph 5.21 onwards), DfE worked with the sector to mitigate the impact on HEPs by the reversion to CAGs in August 2020. Following this, in 2021 DfE also worked with Ofqual on TAGs for summer exams and with UCAS to tackle oversubscription on competitive courses, such as medicine and dentistry (please see paragraph 5.70 onwards).

Attainment

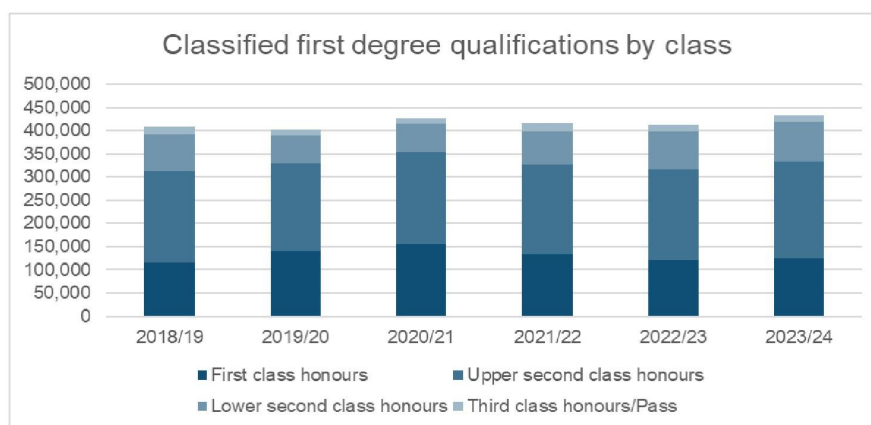
6.14. On degree attainment during the COVID-19 pandemic, HESA data shows an initial decrease in the overall number of HE qualifications obtained in 2019/20 (Exhibit HS1/337 – INQ000607713), which is attributable to administrative delays during the pandemic (Exhibit HS1/338 – INQ000607738). This led to a number of degrees not being reported during the normal data collection process. There was a corresponding rise in the number of qualifiers in the 2020/21 student data, as

providers reported those qualifiers whose degrees had not been reported for the 2019/20 academic year (Exhibit HS1/338 – INQ000607738).

Table 5 – Overall HE qualifications obtained by level of qualification (all domiciles), 2018/19-2023/24. (Source: HESA)

	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Undergraduate	513,720	492,715	527,300	529,390	541,515	555,835
Postgraduate	314,730	308,050	345,780	390,585	433,520	497,220
Total	828,455	800,765	873,080	919,970	975,040	1,053,060

Chart 5a – Classified (first degree only) qualifications by class (all domiciles), 2018/19-2023/24. (Source: HESA)



6.15. Although there was a decrease in the overall number of HE qualifications obtained in 2019/20, a higher proportion were first class honours. Chart 5a above shows the qualification class split of first degrees only, which is a smaller subset of the overall qualifications outlined in table 5 above.

6.16. In 2019/20 many providers issued public statements that a ‘no detriment’ approach would be adopted when it came to assessment. This typically ensured that students would be awarded a final grade no lower than the most recent provider assessment of their attainment.

6.17. Although many of the blanket ‘no detriment’ policies of the previous year were discontinued at the end of the 2019/20 academic year, many providers introduced

modified mitigation policies designed to take into consideration the ongoing difficulties faced by students. The continuation of these mitigation policies, coupled with changes to assessment practices, was reflected in the proportions of each degree classification awarded in the 2020/21 academic year, with the proportion achieving first or second class honours being similar to or higher than in previous years (Exhibit HS1/339 - INQ000607714).

6.18. The proportion of students receiving a first or upper second class honours qualification fell in 2021/22 and trends in degree classifications have since returned to around pre-pandemic levels. The OfS has been monitoring grade inflation over time and considering how to address it, with a particular focus on grade inflation during the pandemic; OfS has set an expectation of HEPs, agreed with UUK, to return grades to pre-pandemic levels. The OfS continues to monitor student outcomes, and to use that data to identify HEPs not meeting regulatory requirements relating to assessment and awarding practice (Exhibit HS1/340 – INQ000607758).

Withdrawal, continuation, completion and progression

6.19. The DfE also monitored withdrawal, continuation, completion and progression rates for HE before, during and after the COVID-19 pandemic. These rates are monitored through SLC data for withdrawals and OfS data for continuation, completion and progression.

Withdrawal rate

6.20. The SLC counts a withdrawal when a student leaves anytime during the period of their course and does not intend to re-engage in their course meaning they have no further obligation to pay fees to the HEP. A withdrawal terminates a student's period of student finance eligibility and SLC will recalculate their maintenance and tuition fee support. This data is only available for English domicile students.

Table 6: Withdrawal rates for English domiciled students, 2018/19-2023/24. (Source: SLC)

	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Count of withdrawal notifications	29,523	27,085	28,728	35,664	37,885	34,476
% Withdrawn	2.5%	2.2%	2.2%	2.6%	2.7%	2.4%

6.21. Table 6 shows that withdrawal rates remained stable with small fluctuations. As part of HE student finance modelling work, DfE monitored withdrawal rates in the SLC data published from 2018/19 through to 2023/24 to see whether there had been any change (Exhibit HS1/341 – INQ000607715).

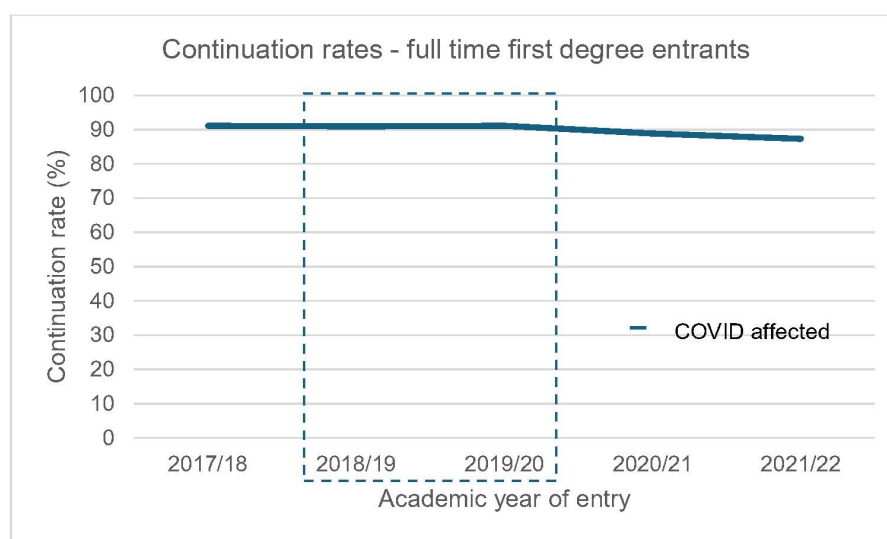
6.22. This publication shows that, for England domiciled students, the withdrawal rate was lower during 2019/20 and 2020/21, before increasing slightly in 2021/22. These are experimental statistics, and it is unclear if any fluctuations are only attributable to the COVID-19 pandemic.

6.23. DfE also analysed continuation, completion and progression rates published by the OfS (Exhibits HS1/342 – INQ000607716 and HS1/343 - INQ000607717).

Continuation rate

6.24. The continuation rate is defined by the OfS as *“the proportion of entrants that were observed to be continuing in the study of a higher education qualification (or have gained a qualification) one year and 15 days after they started their course (two years and 15 days for part-time students).”* The cohorts who would have been studying at HEPs during the COVID-19 pandemic, are 2018 and 2019 full-time entrants and 2017 and 2018 for part-time entrants.

Chart 7a: Continuation rates for full-time first degree entrants, 2017/18-2021/22. (Source: OfS)

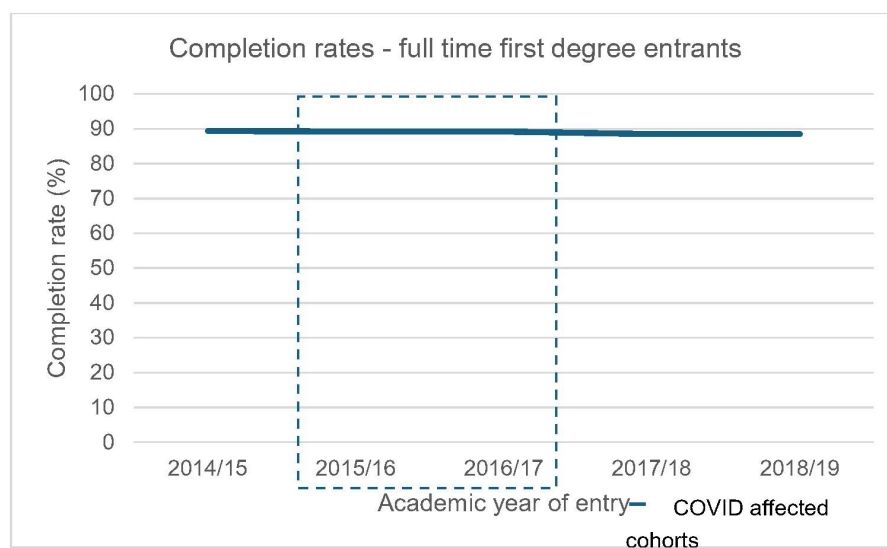


6.25. Chart 7a shows that continuation rates were high during the period across all modes and level of study. For full-time first degree students 90.9% of entrants in 2018 and 91.1% of entrants in 2019 continued into their second year of study. This rate declined slightly in 2020/21 and 2021/22, post pandemic.

Completion rate

6.26. Completion rate is defined as *“the proportion of entrants that were observed to have gained a higher education qualification (or were continuing in the study of a qualification) four years and 15 days after they started their course (six years and 15 days for part-time students).”* The cohorts that would have been studying at HEPs during the COVID-19 pandemic are 2015 and 2016 full-time entrants and 2013 and 2014 part-time entrants.

Chart 8a: Completion rates for full-time first degree entrants, 2014/15-2018/19. (Source: OfS)



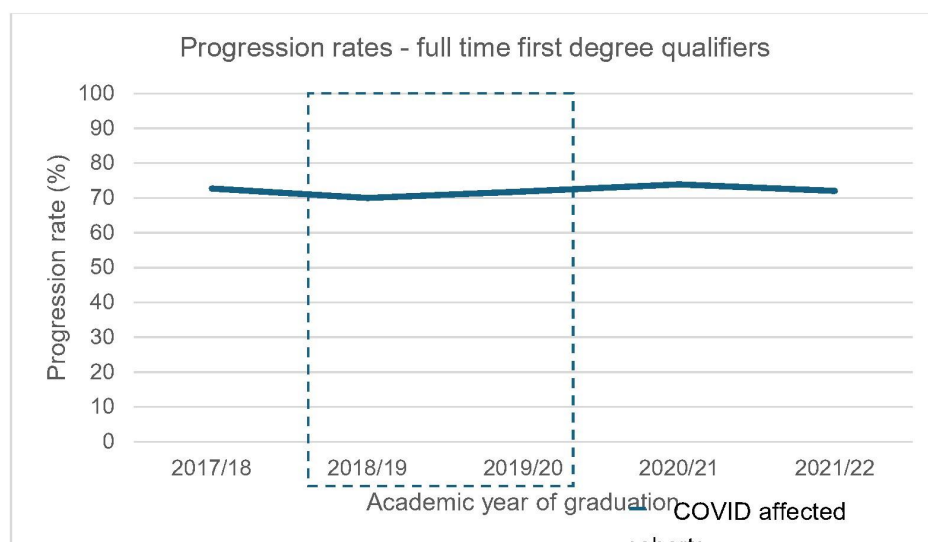
6.27. Chart 8a shows that completion rates for full-time first degree students remained stable over the 4-year period of entrants (2015-2018), with 89.2% of entrants in 2015 and 2016, completing their course. This rate fell marginally to 88.5% for 2017 and 2018 entrants.

Progression rate

6.28. Progression rate refers to the proportion of UK-domicile graduates in managerial or professional employment, further study, or other positive outcomes 15 months

after completing higher education (this according to those responding to the graduate outcome survey). The cohorts affected by the COVID-19 pandemic are the 2018 and 2019 qualifiers.

Chart 9a: Progression rates for full-time first degree qualifiers, 2017/18-2021/22. (Source: OfS)



6.29. Chart 9a shows that progression rates remained stable across 2018-2021 for all study modes and levels. For full-time first degree students, 70% of 2018 qualifiers were in professional employment or further study 15 months post-graduation. This increased to 71.9% for 2019, 73.9% for 2020, but dropped to 72% for 2021 qualifiers.

Employment and future prospects

6.30. As set out in chart 9a above on progression rates, students graduating during the pandemic period had broadly similar outcomes to those who graduated before the pandemic, in terms of their progression into professional employment or further education.

6.31. The DfE publishes yearly HE LEO data, providing "*information about outcomes for UK domiciled first degree graduates, focusing on outcomes among those adults who graduated from Higher Education Institutes (HEPs) 1,3 and 5 years after graduation*". The 2020/21 tax year overlapped with the COVID-19 pandemic and the data shows that there was an impact on the earnings and employment of graduates in the labour market in 2020/21. Students graduating in 2018/19 will be in

the labour market in 2020/21 (1 year after graduation). For the 2020/21 tax year, higher rates of employment support can be seen in students who had recently graduated, and lower numbers of graduates were in sustained employment, along with new graduates experiencing lower earnings (Exhibit HS1/344 – INQ000607688).

Table 10: percentage of L6 (undergraduate) and L7+ (postgraduate) graduates 1 year after graduation in sustained employment (i.e. 2021-22 in this table relates to those who graduated in the 2019/20 academic year – just as COVID-19 lockdowns began). (Source: LEO)

Year of graduation (academic year)	2016/17	2017/18	2018/19	2019/20
Year of data 1 year after graduation	2018-19	2019-20	2020-21	2021-22
% of L6 graduates 1 year after graduation in sustained employment	90.2%	89.5%	87.9%	87.8%
% of L7+ graduates 1 year after graduation in sustained employment	90.5%	90.0%	89.2%	89.1%

6.32. Nominal median earnings for UK domiciled first degree graduates and postgraduates one year after graduation in 2020/21 decreased compared to the previous tax year for the first time (decreasing slightly by 0.3%), which may suggest that new graduates were particularly impacted by the COVID-19 pandemic. First degree earnings one year after graduation decreased in real terms by 1.3% compared to 2019/20 (Exhibit HS1/344 – INQ000607688). Note that earnings and employment rates reduced for non-graduates too around this period; DfE would still expect HE to typically yield strong net lifetime earning returns for these graduates.

6.33. The DfE also published analysis focusing on the effect of COVID-19 on graduate employment and earnings outcomes (Exhibit HS1/344 – INQ000607688). The analysis looked at data on the uptake of “*Coronavirus employment schemes*” (relating to graduates), examining the volume of graduates who received this support. These schemes were the Coronavirus Job Retention Scheme (“CJRS”) and Self-Employment Income Support Scheme (“SEISS”) (Exhibits HS1/345 – INQ000607680 and HS1/346 – INQ000607681). Receiving the support indicated that the graduate’s earning outcomes were likely negatively impacted by COVID-19 (e.g. by being on 80% furlough pay rather than full pay). The groups that already

typically had the lowest earnings and employment outcomes received the highest rates of employment support, indicating that their outcomes were more negatively impacted by COVID-19. This included students who had more recently graduated, younger graduates, graduates with lower prior attainment, and graduates studying subjects with low earnings outcomes (such as performing arts or creative arts and design). The analysis concluded that “*COVID-19 lockdowns and restrictions negatively impacted graduate earnings and employment in 2020/21*”.

6.34. As previously stated, during the pandemic MoSU was concerned about the impact COVID-19 was having on the future opportunities for students (see paragraph 5.62). In response, the Graduate Support Package was announced in May 2021 to help support HE students in their future careers (see paragraph 5.62).

Differential impact

6.35. The Inquiry requested analysis on whether the pandemic had differential impacts on certain young people in HE, the examples given being those with disabilities, those who were in care, and those with neurodivergence. Of these groups DfE only has data on disabled students. Along with this, DfE looks at other data by disadvantage in its statistics and publications, mostly free school meals (“FSM”) status and disadvantage measures such as POLAR and IMD. DfE also uses household residual income data in the SLC datasets.

6.36. Impact on disabled students

6.36.1. HESA collects data on student disability status. The categories are split between a ‘known disability’ and ‘no known disability’. The ‘known disability’ category covers a range of conditions from hearing/visual/physical impairments to mental health conditions and long-term illness. In table 11 below, data published by the HESA shows that the proportion of HE student entrants with a known disability was around 12-13% between 2018/19 and 2022/23, before rising to 15% in 2023/24.

Table 11: HE student entrants by personal characteristics. (Source: HESA)

Disability status	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24

Known disability (number & percentage)	130,955 (12.0%)	140,910 (12.4%)	162,720 (13.0%)	167,395 (13.0%)	182,860 (13.4%)	198,280 (15.0%)
No known disability (number & percentage)	956,480 (88.0%)	996,000 (87.6%)	1,089,670 (87.0%)	1,115,980 (87.0%)	1,182,455 (86.6%)	1,120,405 (85.0%)

6.36.2. There is limited empirical evidence on the impact of COVID-19 on disabled HE students relative to non-disabled HE students. Prior to the COVID-19 pandemic disabled students were shown to be at risk of poorer HE outcomes in terms of continuing with their course, overall degree attainment and progression into highly skilled employment or postgraduate study (Exhibit HS1/347 – INQ000607687).

Chart 12a: The difference in degree attainment between those who reported a disability and those who did not. (Source: OfS Student Characteristics dashboard)



6.36.3. In 2020 the OfS published a series of briefing notes on the steps universities and colleges could take to support HE students during the pandemic, including

the approaches universities and colleges were already taking to support disabled students (Exhibit HS1/348– INQ000607494). In one of these briefing notes the OfS expressed concern that the pandemic could exacerbate disabled students' risk of poorer outcomes as well as cause new issues to emerge (Exhibit HS1/348 – INQ000607494). As shown in chart 12a above, the gap in degree attainment between domestic graduates achieving a full-time first degree who did and did not report a disability was smaller in 2019/20 compared to 2018/19. Since then, the gap has continued to reduce and in 2021/22 graduates who reported a disability were 0.5 percentage points more likely to achieve 2.1 or a first.

Chart 13a: The difference in progression (defined in paragraph 6.28) between those who reported a disability and those who did not. (Source: OfS Student Characteristics dashboard)



6.36.4. As shown in chart 13a above, the progression rates for students who reported a disability was lower than the rates for students who did not report a disability throughout the COVID-19 pandemic.

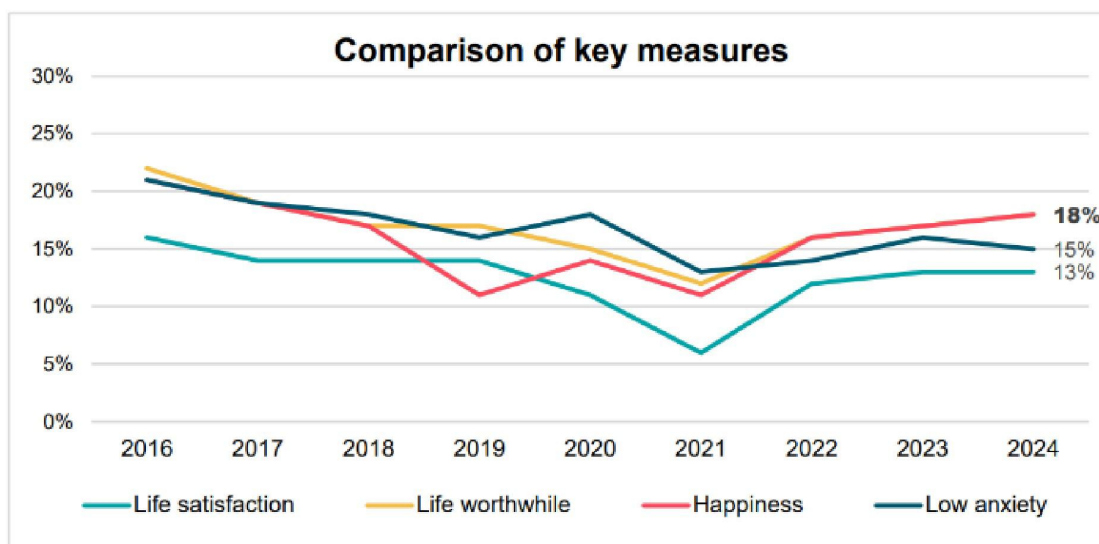
Mental health and wellbeing

- 6.37. This section covers the evidence on the impact of the COVID-19 pandemic on student mental health and wellbeing. We have drawn mainly on sources that utilise validated measures and where this is not possible, we have relied on some self-reported studies. The mental health and wellbeing in young people section of this statement (from paragraph 5.48) shows how DfE has responded to support students with their mental health and wellbeing during and since the COVID-19 pandemic.
- 6.38. Prior to the pandemic, research shows that the proportion of HE students declaring a mental health condition had been rising for several years. Whilst only a small minority of students declared a condition, for full-time UK HE entrants this increased from 1.6% in 2014/15 to 4.3% for entrants in the 2019/20 academic year and since then has risen to 4.8% for entrants in 2022/23 (Exhibit HS1/349 – INQ000607652).
- 6.39. In addition, prior to COVID-19 (outlined in DfE's *Higher education and mental health: analyses of the LSYPE cohorts* report published in June 2021), the LSYPE2 cohort, who started HE in 2018/19, were observed to have somewhat higher scores on mental distress during their first year in HE compared to those in the cohort who did not attend HE. However, this difference between those who did or did not attend HE was not observed in the LSYPE1 cohort, who had started HE in 2008/09 and were followed up at age 25. The study acknowledged "*It could be that attending higher education has a short-term effect on symptoms of common mental disorder (at age 18/19) but, by the age of 25, this has disappeared. However, it is also possible that differences occurring between the two cohorts explain the findings, since LSYPE2 was conducted 9 years after LSYPE1*" (Exhibits HS1/350 – INQ000607718 and HS1/351 - INQ000607719). For the LSYPE1 cohort the study followed young people up to the age of 25, although mental health was not measured at age 18 to 20 (mental disorder being measured at different time-points for LSYPE 1 and 2).
- 6.40. In November 2020, survey data showed that more than half of students (58%) reported that COVID-19 had impacted on their mental health or it had worsened since the beginning of the COVID-19 pandemic (Exhibits HS1/352 – INQ000607556 and HS1/353 - INQ000607682). The reporting of worsening mental health over the specified period was consistently found for a substantial proportion of students during 2021 and into 2022 (Exhibit HS1/354 – INQ000607683), particularly in the

early part of 2021, with lower proportions towards the second half of 2021 (Exhibit HS1/355 – INQ000607684).

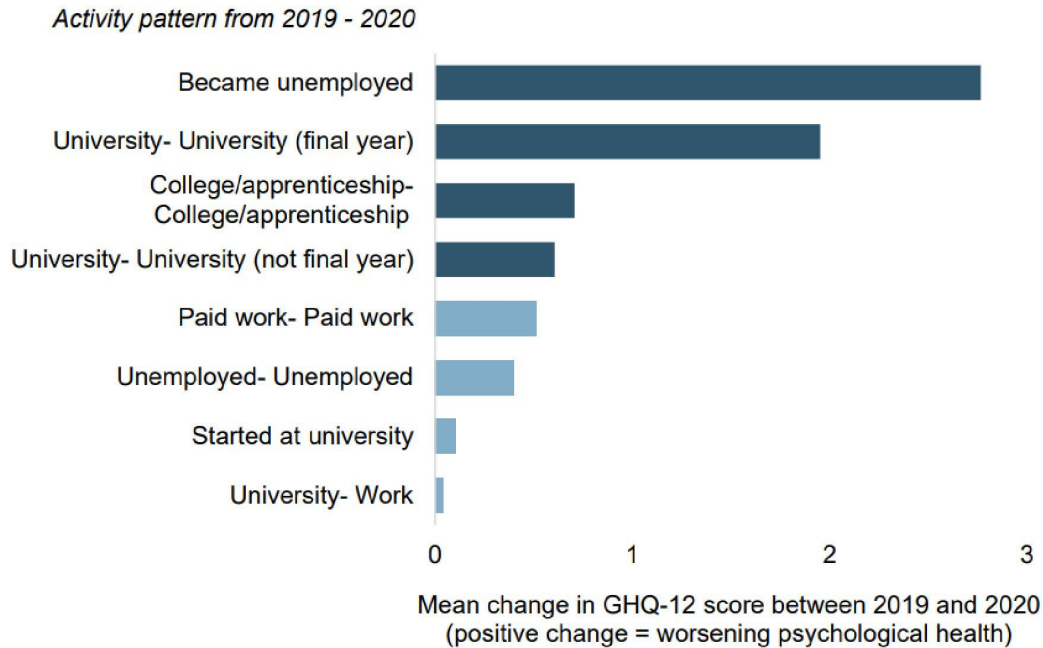
6.41. Research by HEPI/Advance HE had also shown that student wellbeing, measured by the ONS standardised questions (Exhibit HS1/356 - INQ000607685), reduced across all 4 wellbeing measures (*“life satisfaction”*, *“life worthwhile”*, *“happiness”* and *“low anxiety”*) in 2021, compared to 2020. *“Life satisfaction”* was lower in 2020 compared with 2019 but reached its lowest point in 2021. Similarly, *“life worthwhile”* scores were consistently lower in 2020 and 2021 compared with 2019 (Exhibit HS1/357 – INQ000607654). Comparative analysis showed that the average life satisfaction score (on a scale from 0-10) for students (6.7) was significantly lower than the general population (7.1) throughout 2021 (Exhibit HS1/358 – INQ000585141).

Chart 14a: Comparison of 4 key wellbeing measures. (Source: Student Academic Experience Survey 2024)



6.42. As shown in chart 14a above, in the context of a broader timeframe, student wellbeing scores had been declining prior to COVID-19. Subsequently, following the pandemic, scores on all 4 measures have increased since reaching their lowest point in 2021 (Exhibit HS1/357 - INQ000607654).

Chart 15a: Average change in psychological health between 2019 (aged 19/20) and 2020 (aged 20/21) split by main activity pattern. (Source: State of the Nation 2021: children and young people’s wellbeing research report)



Dark blue bars are statistically significantly different to zero at the 95% confidence level; light blue bars are not. Graph excludes some activity patterns for ease of presentation (no excluded patterns were significantly different to zero). Unweighted base sample = 4,933 (activity patterns shown in graph account for 3,953). See 'Annex B. LSYPE2 methodology' for category base sizes.

6.43. Published in February 2022, DfE's *State of the Nation 2021: children and young people's wellbeing research report* provides comparative analysis on a measure of psychological health of HE students and non-HE students in the LSYPE2 cohort, aged 20 to 21 in 2020 (surveyed between May and September 2020). This report, and chart 15a above, shows that the highest decline in psychological health compared with 2019 was for non-HE students, who had become unemployed during that period. The second largest decline was among those in HE, specifically those in their third year (Exhibit HS1/359 – **INQ000542827**).

6.44. The DfE research survey of HE providers in 2022 examined the range and extent of institutional support for students' mental health and wellbeing. It showed an increase in the proportion with a dedicated mental health strategy compared with a previous study immediately prior to the pandemic in the academic year 2019/20 (66% compared with 52% in 2019). A suicide prevention strategy was also reported by 66% of HE providers in 2022 (comparisons with 2019 were not possible on this measure).

7. Lessons learned

7.1. The COVID-19 pandemic presented unique challenges to everyone involved in the delivery of HE, from students and their parents, to staff, to those involved in regulation and working in the centre of government. This was an unprecedented situation with a need to take difficult decisions, often at great speed, and DfE recognises the significant and lasting impact these decisions have had on young people.

7.2. As a result of the challenges of COVID-19, DfE, HEPs and HE sector organisations had to adapt to operating differently and as a result learned a number of lessons. The main four are set out below.

7.3. The first lesson is around the benefit of more direct DfE engagement with the HE sector. As COVID-19 developed and the virus spread, DfE started to play a more active role and engaged more directly and frequently with the sector. As set out in this statement, this was done through meetings between ministers and Vice Chancellors, publishing HE specific guidance, letters to Vice Chancellors and students, blogs, regular stakeholder meetings, and the formation of stakeholder groups including the HE Taskforce, the HE Mental Health and Wellbeing Taskforce and the PSSG. This had benefits, with DfE supporting the HE sector to come together to tackle shared challenges. Both during the pandemic and since, DfE was particularly active in two areas – HE admissions and mental health.

7.4. It became clear to DfE in the early months of the pandemic that admissions to HEPs would be highly complex in 2020. With huge uncertainty about, for instance, how many international students would attend English HEPs in the 2020/2021 academic year, a number of larger, more high profile HEPs began aggressive recruitment campaigns. This could have resulted in smaller, less high profile HEPs receiving fewer applications and subsequently less funding, which could have presented a risk to their financial viability.

7.5. As set out in paragraph 5.5 of this statement, DfE acted quickly to introduce a package designed to stabilise the admissions system. This stabilisation had the desired effect and DfE went on to work directly with UCAS, representative bodies and HEPs in 2020 and 2021 to ensure that places were offered fairly, and that enough places were available for students. Where it became evident that more places would be needed, DfE worked with HEPs, sector organisations and OGDs to

make funding available to create more places. In the case of medical and dental courses, DfE led work to raise the caps on the number of students who could study those courses in 2020 and again in 2021. As a result of lessons learned throughout this process, DfE now retains a much closer interest in, and has better knowledge about admissions behaviours, than before the COVID-19 pandemic.

- 7.6. Early on in the COVID-19 pandemic, DfE and the sector as a whole began to see a negative effect on the student experience, and student wellbeing and mental health in particular. As set out in paragraph 6.38 of this statement, DfE had seen a gradual decline in student wellbeing levels over several years, but this declined more rapidly during the years 2020 to 2021. It was evident that students were facing a unique set of challenges and that DfE could take further action to support them.
- 7.7. As a result, DfE worked with HE sector organisations to introduce initiatives such as the Student Space website and the OfS Challenge Competitions. The formation of the HE Mental Health Taskforce, chaired by MoSU, enabled DfE and sector organisations to work together to ensure students had the mental health and wellbeing support and guidance that they needed. With the appointment of Professor Edward Peck to chair the HE Mental Health Implementation Taskforce, funding for the Student Minds Mental Health Charter Programme and the commissioning of the first National Review of HE Student Suicides, DfE has continued to focus on and invest in student mental health and wellbeing in the years since the COVID-19 pandemic.
- 7.8. The second lesson is about approaches to teaching and assessment. The COVID-19 pandemic necessitated a radical shift to alternative ways of teaching for HEPs, with providers having to switch rapidly to new online methods of teaching, tutorials and lectures. At the same time, HEPs were also forced by the COVID-19 pandemic to change the way they conducted assessments. HEPs learnt much during this process, and many have since changed the way they assess students as a result. However there have also been drawbacks identified around this approach, with concerns raised around cheating and whether these assessments are fair.
- 7.9. The OfS conducted a review, published in 2021, of the shift to digital teaching and learning. The review emphasised the importance of tailoring content for a digital environment, ensuring access to digital provision, training staff and students in digital skills, and designing content to be inclusive for all students. The review noted that *“more work needs to be done to develop scalable approaches, particularly in*

addressing potential risks around plagiarism and ensuring that sweeping changes to assessment methods do not bake in unwarranted grade inflation". It also set out that digital assessment, when done well, can enhance the maintenance of rigorous standards. The review provided recommendations on the use of online provision without damaging students' experience or academic integrity. Where provision takes into account these recommendations, it can have benefits to learning (Exhibits HS1/360 – INQ000607759 and HS1/361 - **INQ000641618**).

7.10. Whereas DfE moved quickly to adopt a more hands-on approach around student admissions and mental health and wellbeing, the switch to new ways of teaching and assessment was led much more by HEPs themselves, to their great credit. DfE could have done more to share best practice and/or establish a central evidence base that HEPs could use to learn and share what worked well and what approaches were most effective. In a future crisis, there may be a role for the department to play, alongside sector bodies and HEPs themselves, in facilitating the gathering of robust evidence around what works well and what the drawbacks are to any change in teaching and assessment.

7.11. The third lesson is about HEP support for students to ensure success. DfE and the HE sector knew that the decision to move from grades generated by the Ofqual standardisation model to CAGs (grades based on teacher judgement rather than a marked assessment) in the summer of 2020, would give students higher grades. This meant that there would be students entering HEPs in autumn 2020 (or 2021 if they had deferred their place) who, in 'normal' years, would not have achieved the grades required to gain their place on a course. The government and the sector had some concerns about the levels of support that might be needed for students who might not necessarily have the skills needed to complete their degree, and that there would be higher levels of dropouts than in other years.

7.12. In fact, as shown in paragraphs 6.8, 6.11 and 6.12 of this statement, the different ways that exams were graded in 2020 and 2021 meant that HEPs actually became more diverse in terms of students they recruited, with an increase in entrants from state-funded schools or colleges and more entrants from low participation neighbourhoods. The sector was able to provide the support needed by these cohorts and outcomes remained broadly consistent.

7.13. As paragraphs 6.8 and 6.14 of this statement shows, for the cohort entering HEPs as undergraduates in autumn 2020, most of whom would be graduating at the end

of the 2022/2023 academic year, degree results in summer 2023 were broadly consistent with results for those who graduated in summer 2019, the year before the pandemic. At the same time, the rates at which students withdrew from HE courses did not increase significantly during this period, actually decreasing slightly in academic years 2019/2020 and 2020/2021.

- 7.14. This taught the OfS and DfE that HEPs could provide more support to ensure equality of opportunity and successful access and participation by students from all backgrounds and socio-economic groups. All HEPs registered with the OfS that intend to charge higher level tuition fees must have an Access and Participation Plan (“APP”) approved by the Director for Fair Access and Participation at the OfS, which sets out how they will improve equality of opportunity for underrepresented groups.
- 7.15. In November 2021, DfE issued guidance to OfS, asking it to refocus the access and participation regime to have a greater focus on supporting students throughout the student lifecycle. All approved providers who were intending to charge fees above the basic amount were required to fully rewrite their APPs to be in place for September 2025.
- 7.16. In March 2023, the OfS launched the Equality of Opportunity risk register. This highlights 12 key sector risks across the student lifecycle (access, on course and progression) and the groups most likely to experience these (by student characteristic, which includes but is not limited to: students from low-income households, ethnicity, care experience and disability). In November 2024 the government set out an expectation for providers to play a stronger role in expanding access and improving outcomes for disadvantaged students, making sure they are delivering strong and ambitious APPs.
- 7.17. The fourth lesson is how DfE and HEPs structure a response to other infectious diseases. The ability of HEPs to adapt their academic and pastoral provision has been tested recently as they have responded to outbreaks of Mpox on and beyond campus. As Mpox was highlighted as an infection of concern by UKHSA, DfE had prepared guidance for the education settings before an outbreak had been identified, and individual officials were identified as points of contact for any settings that may be affected by such an outbreak.

7.18. DfE was therefore well prepared for a recent Mpox outbreak in Leeds which led four HEPs to collaborate to lock down student accommodation and support impacted students to self-isolate there together. DfE contacted the providers to offer immediate support and reassurance, and liaised with them, UKHSA and the local Health Protection Team to ensure that student welfare was prioritised. The four affected providers worked rapidly with UKHSA to trace different categories of close contact and put specific measures in place for them. The highest category contacts were locked down together for a defined incubation period, and the HEPs provided deliveries of food and hygiene supplies and cleaning materials, as well as laundry provision, mental health support and access to remote learning. Others identified as more distant contacts were given instructions about symptoms and incubation periods and asked to remain vigilant.

7.19. DfE played a similar support and reassurance role in response to a second outbreak at the University of Kent. This outbreak did not affect student accommodation – the impacted students lived off campus – but the university offered remote learning and other support to the impacted students, and sustained support and reassurance to other students who were concerned about the potential for the infection to spread. The preparedness of university staff to engage with local Health Protection Teams, and their ability to pivot provision accordingly was both impressive and reassuring, and it seems likely that their experience of responding to the COVID-19 pandemic has made a positive difference.

8. Annex A: Substantive updates to *Higher education providers: coronavirus (COVID-19)*

8.1. *Higher education providers: coronavirus (COVID-19)*, published on 3 June 2020, was developed by the Department for Education (“DfE”) to support higher education providers (“HEPs”) to maintain educational provision whilst adapting to public health measures during the pandemic. It provided a framework for safely operating campuses, guided by scientific advice. Over time, the guidance evolved to reflect government guidelines, covering social distancing, testing, contact tracing and isolation, face coverings, as well as broader hygiene and control measures in the context of higher education (“HE”) settings (and accommodation). It also addressed topics that varied depending on the stage of the COVID-19 pandemic such as risk assessments, international students, legal responsibilities and compliance, and the wellbeing of staff and students. The guidance was updated 43 times to align with changes in the response to the COVID-19 pandemic, sometimes supplemented by additional guidance on specific issues. Below is a table of the main updates made to this guidance, showing how this was updated in response to the COVID-19 pandemic.

Date	Update
3 June 2020	The main operational guidance (initially titled <i>Higher Education: Reopening Buildings and Campuses</i> and later renamed), was published to support providers in planning for the reopening of settings for the 2020/21 academic year. The guidance also asked providers to consider the needs of vulnerable students and staff, international students unable to return, and those without accommodation to ensure they were not disadvantaged.
10 June 2020	The wellbeing section of <i>Higher Education: Reopening Buildings and Campuses</i> was updated, more thoroughly acknowledging the increased strain on staff wellbeing due to COVID-19. It referenced guidance on safer workplaces and highlighted employer responsibilities for staff health.
10 Sept 2020	The guidance, <i>Higher Education: Reopening Buildings and Campuses</i> , had a major update ahead of the autumn term reopening, incorporating lessons from the summer, questions from providers and new public health advice. More detail on safety measures was added, outlining expectations for face masks, ventilation and cleaning. The social distancing section now went into

further detail, including advice on segmentation (referencing the Scientific Advisory Group for Emergencies (“SAGE”)), and a section on infection control was introduced, with advice on local outbreak management and NHS Test and Trace.

Expectations on blended learning were also explained, as well as guidance on specific teaching and learning environments. The guidance also addressed student movement and accommodation in more detail, introducing the concept of student ‘households’ within shared accommodation, which meant that students living together would be treated as a single unit for isolation purposes. The wellbeing section was expanded, including details about the launch of the Student Space platform, funded by the Office for Students (“OfS”), to supplement existing mental health services. The update also provided more details on the allocation of OfS Student Premium funding, as well as encouraging HEPs to work in partnership with local NHS and care services to address any additional needs that could not be met within the HE setting.

Complementary to this guidance, a bespoke HE Test and Trace Handbook was published on this date, outlining how to manage cases and contacts within HE settings.

15 Oct 2020	The section on response to local outbreaks in <i>Higher Education: Reopening Buildings and Campuses</i> was expanded, reflecting the new 3 tiers of COVID-19 measures and it included a new section on local COVID alert levels.
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3 Nov 2020	An additional document, <i>Higher education: new national restrictions guidance</i> , was published alongside the existing guidance. This document explained that universities should remain open despite lockdown measures. The update highlighted that universities had already implemented significant measures (as outlined in the main guidance document) to ensure safety, and that there was no evidence of increased transmission within these environments. Face-to-face teaching was expected to continue where feasible, provided it met COVID-secure standards, and providers were reminded to maintain quality of tuition. Universities were advised to collaborate with local public health teams to determine the appropriate balance between online and face-to-face teaching, considering factors such
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as public health risks and students' mental wellbeing. The guidance also outlined restrictions on student movement, recommending that students avoid traveling home during the lockdown. International students could return home if they wished to, but the guidance stressed the importance of adhering to Public Health England ("PHE") advice and the risk of self-isolation upon return (signposting to bespoke guidance for international students from Universities UK ("UUK")). It also addressed wellbeing support, including for those self-isolating, and reiterated guidelines for socialising, particularly for those in halls of residence.

11 Nov 2020 Ahead of the Christmas break, DfE published the supplementary document *Student movement and plans for the end of term*. This document helped HEPs plan student travel arrangements for the end of term in December 2020, asking providers to stagger student departures to reduce travel-related transmission risks. It explained there would be a 'student travel window' between 3 to 9 December (following the end of national restrictions on 2 December) and therefore face-to-face provision for the winter term should have finished by 9 December at the latest. It also outlined guidance on testing availability before students returned home and provided advice on self-isolation and quarantine for students traveling from high-risk areas.

2 Dec 2020 In advance of the spring term, DfE released another supplementary document titled *Students returning to higher education for spring term*. This new guidance outlined how providers should manage the safe return of students after the Christmas break in the context of continuing COVID-19 restrictions. The guidance explained that students should not return to campus until mid-January unless it was required for essential face-to-face teaching, such as those on practical courses, placements or clinical training. Providers were encouraged to stagger student arrivals to avoid overcrowding and reduce the risk of spreading COVID-19. The update also included specific advice on testing for students returning to university. For those unable to return in person, universities were advised to provide remote learning options to ensure that students continued their studies while staying safe. Over December, this guidance was updated to reflect national health advice on self-isolation and provided further clarification on local restriction tiers.

7 Jan 2021 DfE replaced *Students returning to higher education for spring term* with the new guidance, *Students returning to, and starting higher education, in spring term 2021* which reflected the national lockdown restrictions announced 5 January 2021. The guidance explained that whilst universities had created COVID-secure learning environments, the mass movement of students posed a significant risk and as a result, only students enrolled in essential courses were prioritised for face-to-face learning. All other courses were expected to continue online until at least mid-February. The guidance explained that providers were expected to implement asymptomatic testing upon students' return and they were responsible for clearly communicating return dates and ensuring students followed testing protocols upon arrival. Those who declined testing were required to self-isolate for ten days and international students would face additional travel restrictions.

This document continued to be updated with details of which students could return to campus and when, as well as more details about asymptomatic testing and Erasmus+.

11 Feb 2021 *Higher Education: Reopening Buildings and Campuses* was renamed to *Higher Education: Operational Guidance* to reflect that it was no longer about the start of the 2020/21 academic year and ensure that it was consistent with other published guidance.

22 Feb 2021 *Students returning to, and starting higher education, in spring term 2021* was updated to explain that, from 8 March 2021, providers could resume face-to-face teaching for practical and practice-based subjects, such as creative arts, that required specialist equipment and facilities. Universities were instructed not to ask students to return whose courses could continue online, and a review at the end of the Easter holidays would determine when remaining students could return. The update also revised advice on reopening university facilities, including more information on face coverings, ventilation, asymptomatic testing for students and staff, and support for clinically vulnerable individuals. Again, universities were advised to stagger student returns and students were encouraged to get tested before traveling and were required to stay in their term-time accommodation unless legally exempt.

	The two documents continued to be updated over the following weeks, providing advice on students travelling home for Easter break and students travelling from overseas.
13 April 2021	<i>Students returning to, and starting, higher education in the spring term</i> was revised, confirming that remaining students were not to return to campus before 17 May 2021, aligning with Step 3 of the government's roadmap for easing restrictions. The update also provided revised guidance on opening facilities and buildings and testing.
10 May 2021	<i>Students returning to, and starting, higher education in the spring term</i> was withdrawn and replaced with <i>Higher education coronavirus (COVID-19) operational guidance</i> with information on Step 3 of the Roadmap, outbreak plans, face coverings, testing asymptomatic students and staff using Lateral Flow Devices ("LFDs"), new and returning students travelling from overseas, educational visits and field trips. The section on staff and student wellbeing was also expanded; DfE asked providers to prioritise the mental health and wellbeing of their students, including determining what welfare and support services students needed, and adapting provision to the circumstances including reaching out to those students who are likely to be more vulnerable.
6 July 2021	An additional operational guidance document was published ahead of Step 4 of the government's COVID-19 roadmap, outlining that providers would no longer face restrictions on teaching and learning, and that universities could fully resume face-to-face teaching without the need for social distancing or face coverings. While there were no longer restrictions, HEPs were still asked to conduct risk assessments and implement proportionate control measures. The document also included guidance on outbreak management plans and testing for new and returning students from overseas.
27 Sept 2021	Additional guidance, <i>Quarantine arrangements for unaccompanied minors joining higher education providers in England</i> was added. This included information on unaccompanied minors arriving from red list countries quarantining at their destination, including in HEPs' accommodation.
29 Nov 2021	<i>Higher education coronavirus (COVID-19) operational guidance</i> was updated to reflect temporary precautionary measures in response to the

	Omicron variant, as announced by the Prime Minister on 27 November 2021. The update included a recommendation for face coverings in communal areas and consideration of their use in teaching spaces where distancing was difficult. It also introduced new self-isolation requirements for all close contacts of suspected or confirmed Omicron cases.
9 Dec 2021	<i>Higher education coronavirus (COVID-19) operational guidance</i> was updated on 9 December to reflect the introduction of Plan B measures in response to the Omicron variant. While providers were expected to continue delivering face-to-face teaching, staff who could work from home were advised to do so from 13 December. However, this did not apply to those required on-site to support face-to-face education. Sections on communications with students and staff, testing asymptomatic students and staff using LFDs, vaccine certification, students travelling from red countries, mandatory certification and students vaccinated overseas and forming new households were also updated.
20 Jan 2022	<i>Higher Education Providers: coronavirus (COVID-19)</i> was updated following the Prime Minister's announcement on 19 January 2022 that Plan B measures would end. As a result, all COVID-19 restrictions for HEPs were removed. Providers were advised to conduct risk assessments based on wider societal approaches to managing the virus.
21/24 Feb 2022	<i>Higher Education Providers: coronavirus (COVID-19)</i> was updated on 21 and 24 February 2022 to reflect the government's shift towards living with COVID-19. This included the end of asymptomatic testing in HE settings from 21 February 2022 and signposted to the latest UK Health Security Agency ("UKHSA") guidance on contact tracing and isolation from 24 February 2022. HEPs were reminded that no COVID-19 restrictions applied to their operations, and they were expected to continue delivering unrestricted face-to-face teaching.
1 April 2022	<i>Higher Education Providers: coronavirus (COVID-19)</i> was withdrawn.

Statement of truth

I believe that the facts stated in this witness statement are true. I understand that proceedings may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief of its truth.

Signature:

Personal Data

Dated: 31/07/2025