



Department for Business, Innovation & Skills

Fulfilling our Potential: Teaching Excellence, Social Mobility and Student Choice - Consultation

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The closing date for this consultation is 15/01/2016

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Executive Summary

Teaching Excellence Framework (TEF)

1. The proposal for Phase 1 of the Teaching Excellence Framework (TEF) to be based on quality assurance reviews is reasonably straightforward and workable (subject to the recommendations under Question 5 below).
2. The proposals for Phase 2 of the TEF, as currently constituted, do not form a credible and robust way of assessing teaching excellence. They are based on metrics that are questionable proxies for teaching excellence and fail to capture the value of the different types of provision across the sector (such as research-led teaching). This creates a number of risks. Firstly, individual institutions could suffer undeserved reputational and financial damage by being judged as poor at teaching based on a flawed assessment; secondly, institutions might divert their efforts towards improving their performance in the proxy metrics as opposed to making genuine improvements in teaching quality. Finally, there is a risk that the sector as a whole could be damaged, particularly in international markets, if inappropriate judgements concerning teaching quality are made. Given the seriousness of the risks to institutions and the sector, the College would recommend that, beyond Phase 1, the TEF should be developed and piloted over a number of years to ensure that it is robust, credible, and capable of adding real value. Such an approach was adopted for the assessment of impact in the REF, and represents good practice.
3. The TEF must be focused solely on teaching excellence. Widening participation and social mobility are important policy objectives which the College fully and wholeheartedly supports. They are not, however, intrinsically related to teaching quality. An exercise which conflates these issues is likely to lack credibility in all three areas.
4. The success of the TEF will require complete confidence in the expertise and integrity of the review panels. It will be important for panel members to be distinguished and respected peers from institutions which share the values and missions of the institution being judged. The confidence which REF outcomes enjoy across the sector derives in large part from trust in the panel members, and similar confidence in TEF outcomes will also require that panel members are chosen appropriately.
5. TEF assessments should not be coupled with decisions on tuition fee levels in the mechanistic way proposed in the Green Paper. Outcomes from the TEF could be used to inform teaching funding in the way that outcomes from the REF inform research funding, but this should be a separate process and should also take into account the different costs of teaching in different disciplines. The Government must find a way for the combination of Home/EU tuition fees and support for teaching higher cost subjects to meet the full cost of high quality teaching of STEM subjects, if this is to be delivered sustainably.
6. Providing that the methodologies have been appropriately piloted, discipline-level assessments in the TEF are likely to be more accurate and credible than institutional-level assessments, and of more benefit to prospective students. Pilots should also seek to quantify the value to students of the exercise, and ensure that the costs are not out of proportion to that value. In order to reduce the administrative burden, a single institution-wide assessment of cross-disciplinary support and quality enhancement activity should be undertaken, supplemented by the discipline-specific submissions. However, any link between TEF performance and teaching funding should be based on an institution's aggregate performance in the TEF.

Office for Students

7. It would not be appropriate for the statutory duty of the Office for Students to be to act solely in the interests of students. Other factors, such as the need to promote academic excellence and financial sustainability, and to meet the needs of business and society, should also be taken into account. Universities owe a duty not only to their current students, but also to their alumni (the value of whose degrees depends to some extent on the ongoing reputation of the university), and to future students (whose educational

experience is dependent upon the university being run in a sustainable manner in the current day).

8. If the sector has to fund the Office for Students, the sector should also be able to determine its budget and the scale of its operations, in order to reduce bureaucracy. This could be done, for example, through a board of stakeholders representing those funding the Office for Students.
9. It is essential that the formula for allocating teaching funding is devised by the Office for Students overseen by an independent board constituted like HEFCE's, rather than by BIS, to avoid allocations reflecting political considerations.
10. The College strongly supports the current arrangement under Access Agreements whereby universities set their own targets relating to widening participation which are then agreed with the Director of Fair Access. This enables individual institutions to select goals and targets which are appropriate to their mission and which are likely to generate the greatest impact when considered against local circumstances. We consider that, if the Office for Students were given powers to set targets, there would be a reduction in the richness and diversity of programmes undertaken as compared to the current situation, whereas the policy objective should be to encourage further diversification and innovation.

Regulation

11. The College supports the proposal that the Office for Students should be required to implement a risk-based regulatory framework, with very limited monitoring for low-risk providers. In general, risk-based approaches should apply across all the proposals made in the Green Paper, for example in relation to the requirements for providers to have contingency arrangements in place for an exit. Providers that are demonstrably low risk should have "earned autonomy", with a lower regulatory burden.

Freedom of Information

12. The College supports the proposal made in the Green Paper that there should be a level playing field between HEFCE-funded providers and other providers in relation to the Freedom of Information Act. Both should be exempt, as compliance is excessively burdensome compared to the benefits. The College is committed to openness and transparency, and would propose that if universities were made exempt from the Freedom of Information Act, they should continue to publish a selection of appropriate information agreed in consultation with the sector. Universities are also subject to rigorous scrutiny and monitoring of their teaching and research activities through measures such as academic peer review of journal articles, assessment of research quality through the REF, assessment of educational standards and quality through the QAA, and the provision of statistical information to bodies such as HESA, which makes much of the information collected available in the public domain.

Research

13. While we welcome the commitment to maintaining the very effective dual support system, we note that there must be a very strong "firewall" in place between the two streams if both are administered by Research UK to avoid allocations being commingled or diverted.
14. The College strongly supports the Green Paper's commitment to the principle that decisions on individual research projects are best taken by researchers themselves, while the Government's role is to set the overarching strategy (generally known as the Haldane principle). Many decades of experience of research funding have shown that it is simply not possible to predict where the next revolutionary idea will spring from and so at a national level we need to support excellent research across all core disciplines. Care will need to be taken that the new arrangements proposed by Nurse for an overarching Research UK body and a ministerial committee are used as an opportunity to improve strategic decision-making without compromising the Haldane principle. As Professor

Graeme Reid, previously head of research funding in BIS, has observed, “the ring-fenced science budget and the Haldane principle allow the UK to punch well above its funding weight”¹.

15. The College broadly supports the continuation of the REF in a similar format to REF2014, including the broad balance between outputs, impact and environment. The College would encourage panels to consider further use of peer review moderated metrics for those disciplines that would suit such an approach.
16. QR should be distributed based on concentration of excellence, and the allocations should properly reflect the costs of research for different disciplines. Currently the substantially higher costs of STEMM (particularly science, engineering and medicine) research compared to other disciplines are not sufficiently reflected in the relative subject funding weightings.
17. The Green Paper and the Nurse Review propose very substantial changes to the research landscape, which should be consulted on in detail with the sector prior to any implementation.

Imperial College London
January 2016

¹ *Times Higher Education*, 18 December 2014: <https://www.timeshighereducation.com/news/people/qa-with-graeme-reid/2017522.article>.

Public sector equality duty

Question 1:

a) *What are your views on the potential equality impacts of the proposals and other plans in this consultation?*

As part of the piloting of a robust TEF methodology recommended by the College under Question 5 and elsewhere below, it would be helpful for the Government to consider the diversity of provision across the sector and how each institution tailors its teaching to the profile of its students. In particular, the Government should consider the support that institutions provide to disabled students.

b) *Are there any equality impacts that we have not considered?*

Yes

No

Not sure

The development of a robust and credible TEF should support the decision-making of all prospective students, including those with particular protected characteristics.

Teaching Excellence Framework (TEF) (Part A: Chapters 1-3)

Question 2: *How can information from the TEF be used to better inform student and employer decision making? Please quantify these benefits as far as you can.*

Information from the proposed TEF can only be used to better inform student decision-making if the information presented is new, credible, and provides a robust and accurate way of measuring teaching excellence. The Green Paper, however, focuses on the use of existing data that is already widely available, such as the National Student Survey (NSS) results. It is unclear what added benefit the TEF would provide to prospective students simply by incorporating already existing data. There are also conflicting messages within the Green Paper, which notes that currently only “imperfect proxy measures” of teaching excellence are available, yet proposes to utilise these imperfect proxies in the higher levels of the TEF. The information from the TEF is, therefore, unlikely to inform student decision-making any better than existing data sets, and may even have a negative impact on student decision-making if it gives the impression that imperfect proxy measures are validated by the Government as robust ways of measuring teaching excellence.

The UK higher education sector and student population are very diverse, and individual choice should be recognised as key to decision-making. The homogenisation of information into a few metrics for the entire sector may not be helpful to prospective students, who are likely to be interested in a wide range of information outside the three sets of common metrics proposed in the Green Paper (employment/destinations, retention/continuation, and student satisfaction). For example, in the College’s experience, some prospective students considering applying for an integrated Master’s programme in a STEMM discipline are interested in information on the opportunities available for engagement with cutting-edge research. Other prospective students are interested in programmes with professional accreditation that offer a faster route to professional registration in their chosen field post-graduation.

It is unclear on what basis information from the proposed TEF is expected to better inform employer decision-making, as employers usually make recruitment decisions based on the skills and experience of individual candidates rather than on broad and imperfect proxy measures of the quality of the teaching that they received while at university. Graduate recruitment processes tend to involve a number of different assessments and are sufficiently

rigorous to enable employers to identify the most suitable candidates. Securing a graduate job is rarely achieved on the basis of degree classification alone.

The College is also not convinced that a Grade Point Average (GPA) system would improve graduate recruitment decisions in comparison to the current honours degree classification system. Employers who are concerned with further granularity are easily able to request yearly percentage grades or performance at individual examination level from students as part of their application process, tailored to their individual requirements. A GPA system that required marks for every piece of submitted work to be included in the overall calculation would also substantially increase the pressure on students and might incentivise them to select options that are perceived to be easier to achieve a good mark in, rather than options that will challenge them more intellectually. Furthermore, neither the GPA system nor the metrics proposed in the TEF address the issue suggested in the Green Paper that “too many organisations find it hard to recruit the skilled people they need”. It would be more helpful for employers to define the skills that they are looking for and publicise their needs more effectively so that universities would be motivated to adjust their curricula to meet industry needs and put students on the right trajectory from the beginning.

The mechanisms used to deliver and publicise information from any TEF should be accessible and transparent. Data should be fully contextualised to allow for meaningful interpretation and any benchmarks produced should be clearly explained. Currently, course information published through the *Unistats* website often aggregates data in broad subject groups where course sample sizes are small, without providing clear explanations. This can be misleading to prospective students and does not provide them with an accurate or representative indication of their potential experience on specific courses when a number of different courses have been aggregated.

Question 3: Do you agree that the ambition for TEF should be that it is open to all HE providers, all disciplines, all modes of delivery and all levels?

Yes

No

Not sure

Please give reasons for your answers.

The benefits of undertaking TEF assessments at discipline level include: (a) discipline-level assessments would be more accurate in the sense that they will not be attempting to aggregate many different subjects and types of provision; (b) they would be more credible because panels can be made up of subject experts familiar with the type of provision being assessed; and (c) they are likely to be more beneficial to students, who are generally most interested in the subject for which they are applying. It is important that disciplines are appropriately defined in consultation with the sector. In order to reduce the administrative burden, a single institution-wide assessment of cross-disciplinary support and quality enhancement activity should be undertaken, supplemented by the discipline-specific submissions. However, any link between TEF performance and teaching funding should be based on an institution’s aggregate performance in the TEF.

The College would recommend that the TEF only be extended to taught postgraduate level if a sufficiently credible process for assessing teaching excellence at undergraduate level can be developed which commands the confidence of the sector and is capable of application to taught postgraduate level. Taught postgraduate provision is substantially different to undergraduate provision, often involving small cohorts and specialised subject matter, and it may therefore be difficult to make consistent and robust comparisons between institutions, especially as it would not always be appropriate to aggregate individual taught postgraduate programmes to discipline level. Furthermore, often an individual research project is a

significant element of taught postgraduate programmes, and this would need to be recognised in any assessment.

The College is surprised by the assertion in the Green Paper that “there is evidence to suggest ‘strong orientations towards research often reveal a weak emphasis on teaching, and vice versa’²”. This selective quote is misleading, as the same report finds that the research environment can impact positively on undergraduate students, in a way that can be measured, where maximising the benefits to undergraduates of research strengths has been made a deliberate priority. The report cites evidence from MIT concerning how undergraduate students benefit from engaging in a research project as part of a research group, and the finding of a positive relationship at the University of Oxford between students’ experience of research-active staff and the extent to which they take a deep approach to learning as a consequence of the collegial system fostering active inclusion in a community of research practice. The overall conclusion of this section of the report, which ties in with our experiences, is that “the key point here is that such benefits have to be deliberately engineered – they do not accrue by magic simply because research is going on as well as teaching”. The College would therefore suggest that a TEF panel assessing this type of research-led teaching should consider the ways in which institutions are linking their research base into their teaching activity with benefit to their students. Benefits could include giving students who are learning techniques in the laboratory a broader understanding of how those techniques can be applied in cutting-edge research, enriching the curriculum by incorporating the latest research in the field, and providing opportunities for students to engage in research projects. In terms of assessing the extent, quality and impact of research involving undergraduates, it would be straightforward to carry over elements of the REF methodology (for example, research outputs, contextual information through a research environment statement, and examples of impact case studies).

The relationship between trying to achieve the very best research and delivering the very best teaching is complex, but when it works it helps to create the inspirational experience that forms the leaders of the future. We have many examples of undergraduates producing high-quality, impactful original research, and we strongly believe that this adds great value to the educational experience of these Imperial students. The Imperial College Union (ICU) response makes clear the high value that many of our students set on having the opportunity to undertake an individual research project, on the grounds that this provides students with an additional set of skills, knowledge and competencies which gives them an edge either in the graduate recruitment market or when pursuing careers in research. An example of where teaching benefits from the facilities available in a research-intensive environment is in the College’s Carbon Capture Pilot Plant, a four-storey scaled-down chemical engineering plant which provides a fully hands-on discovery experience for students and researchers alike. Built to the highest industrial standards, the plant is a core part of the training that the College provides to its chemical engineering students, typifying many of the features that graduates will encounter in real-world scenarios and giving them skills that will be essential in their future careers. The Carbon Capture Pilot Plant is also a vital resource in the fight against climate change, demonstrating best practice in capturing and storing harmful carbon dioxide before it can be released into the atmosphere. The College actively encourages leading industrial organisations to use this facility for research purposes, and it would not exist if the College were not a research-intensive university.

Another key benefit of teaching in a research-led environment is that universities are able to define new disciplines arising out of research and then educate cohorts of individuals in these new disciplines in an organic way that responds to the needs of industry and academia. An example of this is the discipline of bioengineering (biomedical engineering),

² The quote is taken from the report *Dimensions of Quality* by Graham Gibbs (2010), page 29: https://www.heacademy.ac.uk/sites/default/files/dimensions_of_quality.pdf

which is a research-led development of a field that has found deep roots in research-intensive universities and is now finding its way to other teaching-led universities. This discipline has been co-defined by research-intensive universities and industry and is continually evolving through the research interactions and research activities of these research-intensive universities.

Question 4: Where relevant, should an approved Access Agreement be a pre-requisite for a TEF award? What other mechanism might be used for different types of providers?

It would not be appropriate to include any pre-requisites for a TEF award that are not focused solely on teaching excellence. As discussed in more detail under Question 12 below, the way in which the Green Paper proposes to mix up actions around widening participation and social mobility with assessments of teaching quality is inappropriate, and it would make more sense for these important wider policy issues to be considered separately. An approved Access Agreement should not, therefore, be a pre-requisite for a TEF award, and nor should any other areas not intrinsically related to teaching excellence such as compliance with published CMA guidance.

Question 5: Do you agree with the proposals on:

a) *what would constitute a ‘successful’ QA review*

Yes **No** Not sure

The proposed definition of a “successful” QA review refers to meeting UK expectations in the four areas of the Higher Education Review (HER), a QA review methodology which has only been in place since 2013-14. It is unclear from the proposals what this means for institutions whose current, valid QA review was undertaken under a previous method (e.g. institutional audit) which does not provide a similar judgement against the four areas outlined in the HER. In addition to this, the proposed definition also states that the review used must be published by the end of February 2016, but again it is unclear what this means for institutions who are currently undergoing or are due a review in 2016-17.

If a “successful” QA review is to form level 1 of the TEF, the College would therefore recommend that this should be defined as the following (changes to the original proposal highlighted in **bold**):

- the most recent review undertaken by the QAA or an equivalent review used for course designation (e.g. an ISI review);
- which **is in date within the timetable set by the QAA;**
- **which meets the expectations of the QAA in regards to academic standards and teaching quality based on the review methodology undertaken.**

It should be noted that the QA review encompasses both undergraduate and postgraduate provision.

b) *the incentives that should be open to alternative providers for the first year of the TEF*

Yes **No** Not sure

As discussed in more detail under Question 9 below, TEF assessments should not be coupled with tuition fee levels in the mechanistic way proposed in the Green Paper. Allowing uplifts in the tuition fee cap for alternative providers on the basis of TEF outcomes alone would, therefore, not be appropriate.

c) *the proposal to move to differentiated levels of TEF from year two?*

Yes **No** Not sure

Please give reasons for your answer.

It is of vital importance that there is complete confidence across the sector in the criteria being applied to the different levels of the TEF. The College is concerned by the short timescale outlined in the Green Paper for implementing these levels from Year 2. While a light-touch, metrics-based approach can reduce the burden on institutions, in the timeframe outlined in the Green Paper it will only be possible to utilise existing metrics which are already acknowledged as poor proxies of teaching quality. There is a very significant risk that the reputation of the UK higher education sector, and of individual institutions, could be unjustifiably damaged by the identification of “poor” teaching quality if such an assessment were due to the inappropriate application of metrics and/or the use of poor-quality metrics. While the College is fully supportive of the aim of addressing low standards of teaching, this will only be possible if such standards can be identified accurately through credible means. A better approach would be to allow sufficient time to develop a robust methodology which could be tested and piloted thoroughly, perhaps over a number of years, in order to establish a credible framework which truly measures teaching excellence. As an example, before the assessment of impact was introduced into REF2014 a pilot study was undertaken which was very helpful in developing a methodology to ensure that impact could be assessed credibly and robustly. The College would be very willing to participate in a TEF pilot.

Question 6: Do you agree with the proposed approach to TEF assessments on

Timing?

Yes **No** Not sure

The TEF should develop towards a long-term award rather than being awarded over a short number of years. This will significantly reduce institutional burden and recognise that sustained excellence is achieved over time. The College would advise against maintaining a shorter award as proposed for Years 1 and 2 and would instead propose that first a robust methodology is developed that would allow for a long-term award to be issued from the initial implementation of the TEF. For example, the TEF could operate every 6-7 years on a similar timescale to the REF and QA reviews.

The College has particular concerns regarding the feasibility of a rolling cycle of TEF assessments and how this would provide a consistent assessment of institutions. A rolling cycle would mean that some institutional assessments would be more recent than others, and the panels that made the judgements and potentially the criteria assessed might be different. This complexity would cast serious doubt on the credibility of different assessments and would not provide prospective students with a fair comparison between different institutions. A periodic review approach, such as is currently undertaken for the REF, would resolve many of these difficulties, though it would be important to ensure that the TEF and the REF were not run simultaneously as this would put huge pressure on institutional resources.

Assessment panels?

Yes No **Not sure**

Alongside a robust methodology, paramount to the success of the TEF will be complete confidence in the expertise and integrity of the review panels. As referenced also under Question 3, one of the benefits of undertaking TEF assessments at discipline level is that panels can be made up of subject experts familiar with the type of provision being assessed (for example, research-led teaching in STEMM subjects). As an analogy, one of the strengths of the REF is that panel members are drawn from highly regarded academics who are trusted by the research community to undertake a robust assessment of research quality.

Many undergraduate courses, particularly in STEMM disciplines, are already accredited by professional bodies. In addition to this, vocational programmes such as medicine are often highly regulated already. The TEF should make use of this accreditation / regulation as part of the assessment and not duplicate what are already fairly resource-intensive processes. One approach could be to draw on the expertise and knowledge of the relevant bodies through the assessment panels. Careful thought will need to be given to how very different types of provision can be assessed equitably; for example, programmes such as medicine involve significant collaborative provision, including work-based placements where students are often taught by non-university staff, e.g. NHS staff.

The College would question the suitability of including employer representatives on the assessment panels given that they are unlikely to have any expertise in effectively judging teaching excellence, or even subject expertise. It is also unclear on what basis employer representatives will be selected, given the diversity of the graduate recruitment market and the differing skills and knowledge requirements of different sectors. There are very few disciplines which lead to one career path alone. It is likely that industry employers will be looking for graduates with higher levels of technical skills, while employers recruiting for generalist graduate schemes may be more interested in soft skills, and it would not be appropriate for assessments of teaching quality to be influenced by the demands of a small number of employers. A more effective way of involving employers within the TEF would be to include engagement with employers as part of the qualitative evidence provided by institutions.

It should also be noted that employment is not the only positive outcome for a university graduate. Progression to further study, and particularly to higher research degrees, should be viewed as of equal standing to gaining graduate-level employment. If the assessment is to include career readiness, therefore, it should also include an institution's ability to produce graduates with the skills and knowledge required to progress to further study. From this perspective it would be useful to include academics with research expertise on the assessment panels.

While student engagement and involvement will be a key component of the TEF, linking TEF assessments mechanistically to fee increases may create a conflict of interest and lead to student representatives on assessment panels being reluctant to award the higher levels of the TEF because of the financial impact that this will have on future student cohorts. This is a perverse incentive and could also undermine constructive working relationships such as that between the College and its students' union, Imperial College Union (ICU). Other panel members could also experience conflicts of interests depending on their personal views or circumstances. This is another argument against linking tuition fee levels mechanistically to the TEF (discussed further under Question 9).

As there will be a considerable time burden on panel members, consideration will need to be given to incentivising the most suitably qualified and appropriate people to sit on the panels. Panel members will need to have the respect of their peers across the sector if the outcomes of TEF assessments are to be credible.

The Green Paper notes that a “process for moderation to ensure comparability of judgements across disciplines” is being considered. It is fundamental that a moderation process is in place from the outset in order to maintain the credibility of the judgements made by the assessment panels.

and process?

Yes **No** *Not sure*

Please give reasons for your answer.

As noted under Question 4 above, it would not be appropriate to include any pre-requisites for the TEF that are not intrinsically related to the quality of teaching, such as Access Agreements or compliance with published CMA guidance.

Question 7: How can we minimise any administrative burdens on institutions? Please provide any evidence relating to the potential administrative costs and benefits to institutions of the proposals set out in this document.

The credibility of the TEF assessment process must be paramount, though subject to this principle opportunities to reduce institutional burden should be taken. As discussed in more detail under Question 5 above, rather than utilising existing metrics which are already acknowledged to be poor proxies of teaching quality, a better approach would be to allow sufficient time to develop a robust methodology which could be tested and piloted thoroughly, perhaps over a number of years, in order to establish a credible framework which truly measures teaching excellence. Even if the existing metrics were robust, the additional benefits to students and employers of simply repackaging them as part of the TEF would be insubstantial and unlikely to outweigh the increased administrative burden on institutions.

The proposed mechanistic link between tuition fee levels and the TEF assessments risks the TEF being seen solely as a mechanism for enabling institutions to charge higher tuition fees rather than as a “kite mark” of teaching quality. In these circumstances, institutions would be not be incentivised to participate in the TEF if the financial burden of participation was calculated to be greater than the additional tuition fee income that an institution would receive from achieving the higher levels of the TEF.

As the details of Phase 2 of the TEF are still vague and subject to further consideration, it is difficult at this stage to estimate the potential costs to institutions with any accuracy.

Question 8: Do you agree with the proposed approach to differentiation and award as TEF develops over time?

Yes No **Not sure**

Please give reasons for your answer.

As discussed in more detail under Question 9, TEF assessments should not be coupled with decisions on tuition fee levels in the mechanistic way proposed in the Green Paper. Other than that, it is difficult to comment on the proposed approach to differentiation and award as the TEF develops over time because there is little information within the Green Paper as to how the levels will be differentiated in practice and on what basis they will be awarded. As referenced above under Question 5, given the likely reputational impact on institutions of

certain levels being achieved or not achieved, it is of vital importance that there is complete confidence across the sector in the criteria being applied to the different levels of the TEF.

As discussed in more detail under Question 3, undertaking TEF assessments at discipline level would be beneficial to prospective students because they are generally most interested in the subject for which they are applying.

Question 9: Do you agree with the proposed approach to incentives for the different types of provider?

Yes **No** Not sure

Please give reasons for your answer.

The College believes that TEF assessments should not be coupled with decisions on tuition fee levels in the mechanistic way proposed in the Green Paper. Outcomes from the TEF could be used to inform teaching funding in the way that outcomes from the REF inform research funding, but this should be a separate process and should also take into account the different costs of teaching in different disciplines.

The assertion made in the Green Paper that “the additional income [from tuition fee increases awarded to providers who perform well in the TEF] can be reinvested in the quality of teaching and allow providers to expand so that they can teach more students” is hampered by wider issues with the financial sustainability of Home/EU undergraduate provision. Despite the increase in the maximum tuition fee level in 2012-13, the College is continuing to experience a deficit in Home/EU undergraduate teaching in high cost STEMM subjects which has grown as tuition fee levels have not increased with inflation (£9,000 in 2012 is equivalent to £8,460 in 2015³). The College is currently making an average deficit of around £2,000 on every Home/EU undergraduate student. Any increases in tuition fee income in line with inflation would simply be used to cover inflationary increases in costs, at best maintaining this deficit. The provision of high-quality, research-led STEMM education is resource-intensive by its very nature and necessitates expensive facilities and the use of high cost consumables. If the combination of teaching grant and tuition fee income continues to be constrained below full cost, this will result in Home/EU undergraduate STEMM provision becoming increasingly unsustainable. Institutions may be forced to reduce their Home/EU undergraduate student numbers further and further, not on the basis of poor quality, but because of severe under-resourcing. This would lead to less choice and diminishing opportunities for Home/EU students in STEMM disciplines, and to a wider impact on the UK economy where there is already a shortage of suitably qualified STEMM graduates⁴.

As discussed also under Question 7, there is a risk that linking tuition fee levels mechanistically to the TEF assessments risks the TEF being seen solely as a mechanism for enabling institutions to charge higher fees rather than as a “kite mark” of teaching quality. In these circumstances, institutions would not be incentivised to participate in the TEF if the financial burden of participation was calculated to be greater than the additional tuition fee income that an institution would receive from achieving the higher levels of the TEF. It is likely that linking tuition fee levels mechanistically to the TEF assessments would also result in perverse incentives, particularly with regards to certain metrics and the assessment process proposed. For example, students may be reluctant to score their institution highly on the NSS if higher student satisfaction scores will result in increased fees for their

³ Based on changes in the RPI Index between September 2012 and September 2015:

<http://www.ons.gov.uk/ons/datasets-and-tables/data-selector.html?cddid=CHAW&dataset=mm23&table-id=2.1>

⁴ See, for example: <http://www.raeng.org.uk/publications/reports/jobs-and-growth>.

successors. As discussed further under Question 11 below, the inclusion of metrics based on salary data could incentivise institutions to focus recruitment on groups that are traditionally more likely to go on to earn higher salaries. In addition to this, as discussed also under Question 6, members of the assessment panels could be reluctant to award the higher levels of the TEF because of the financial impact that this will have on future student cohorts.

Question 10: Do you agree with the focus on teaching quality, learning environment, student outcomes and learning gain?

Yes

No

Not sure

Please give reasons for your answer.

Teaching quality

Teaching quality must naturally be the fundamental focus of the TEF. As the Green Paper acknowledges, the intention should not be “to stifle innovation in the sector or restrict institutions’ freedom to choose what is in the best interests of their students”. In order to maintain institutional autonomy, institutions must have the freedom and creativity to deliver intellectually stimulating and engaging teaching using the methods that are best suited to their own students and type of provision. For example, the College offers a large number of integrated undergraduate Master’s programmes which include as a key component an individual research project. Providing students with the experience, skills and capability to undertake such a research project is therefore a vital element of the teaching experience, and would need to be recognised as such in the TEF when this type of provision is considered. With the increasingly complex issues facing the world, the agility that graduates will need to be successful and to contribute to solving world problems requires that they be given the opportunity for open-ended and individually directed experiences. The TEF should, therefore, be able to reward institutions that provide such experiences.

Learning environment

The College would agree that complementary to excellent teaching is a high-quality learning environment, and welcomes the Green Paper’s suggested focus on “the relationship and mutual benefits between teaching, scholarship and research”.

Student outcomes and learning gain

As discussed also under Question 6, it should be recognised that employment is not the only positive outcome for a university graduate. Progression to further study, and particularly to higher research degrees, should be viewed as of equal standing to gaining graduate-level employment. Institutions’ ability to provide students with the skills and knowledge required to progress to further study should, therefore, also be considered in this context as it is essential to supporting the future pipeline of researchers and maintaining the world-class quality of the UK research base.

At present there is no credible metric or methodology for accurately measuring learning gain in a consistent way across the sector. Various crude metrics such as the relationship between entry tariff and degree classification have been suggested, but these are not true measures of learning gain and tend to penalise institutions with higher entry requirements purely on that basis. They can also fuel degree “grade inflation”, which would eventually undermine the credibility of UK higher education. Such metrics should, therefore, be avoided in the TEF. Recent research commissioned by HEFCE in partnership with BIS and the Higher Education Academy (HEA) has found that there is a need for robust piloting of the validity and feasibility of the various different approaches to measuring learning gain within the English context, underpinned by dialogue with the sector and experts to build

understanding⁵. Such robust piloting should be undertaken in conjunction with the thorough piloting of the TEF methodology recommended and discussed in more detail under Question 5. It may take several years to establish whether a credible metric on learning gain can be implemented.

Question 11: Do you agree with the proposed approach to the evidence used to make TEF assessments - common metrics derived from the national databases supported by evidence from the provider?

Yes

No

Not sure

Please give reasons for your answer.

As discussed above, the credibility of the TEF assessment is paramount. There is little justification for utilising metrics which are not robust and which do not provide a reliable assessment of teaching excellence simply because they are the metrics that are currently available. It should be recognised that none of the metrics being considered was developed with the intention that it should be used to measure teaching quality in the way proposed by the TEF. Given the financial and reputational risks to UK higher education institutions of being assessed as poor at teaching under the TEF, it would be irresponsible to implement a framework that does not command the confidence of the sector and does not provide accurate information to prospective students. As discussed in more detail under Question 5 and elsewhere above, a better approach would be to allow sufficient time to develop a robust methodology which could be tested and piloted thoroughly, perhaps over a number of years, in order to establish a credible framework which truly measures teaching excellence.

The College's detailed comments on each of the proposed metrics are as follows:

a) Employment/destination

As highlighted under Questions 6 and 10, if metrics based on data from the Destination of Leavers from Higher Education (DLHE) survey are to be used, they must include further study as an equally positive outcome to graduate-level employment. It should be noted that DLHE data is usually collected six months after graduation and so is of limited value in looking at the longer-term employability outcomes for students from different universities. The proposed future use of HMRC data matching would help to extend such metrics to consider longer-term outcomes and would also be of interest to prospective students if published at institution and subject level. However, it should be noted that HMRC data matching would not capture information on further study and so would not be a suitable data source on its own.

While high graduate salaries can be one way of demonstrating that an institution is able to produce graduates who are highly valued by employers, the use of salary data in the TEF on the premise that higher salaries equal better educational outcomes would not be helpful without context. There are wider purposes of and value to education, and using this metric on its own would not factor in the element of personal choice (e.g. choosing geographical location over job, deciding to work part-time or not at all for childcare reasons, and/or self-employment) or the fact that there are a number of career paths which are of great value to society and the economy but which are not traditionally highly paid. As noted under Question 9 above, using such a metric may also create a perverse incentive for institutions to focus

⁵ <http://www.hefce.ac.uk/pubs/rereports/Year/2015/learninggain/Title,102338.en.html>

recruitment on students from groups that are traditionally more likely to go on to earn higher salaries, or to focus their provision on courses that tend to have higher graduate salaries instead of courses that may have more societal value (though breaking down data on graduate salaries by subject would go some way towards ameliorating this latter issue).

b) Retention/continuation

The current metrics on retention and continuation that are provided as part of the UK Performance Indicators do not provide any context as to why a student chooses to discontinue. It should not, for example, necessarily be considered a negative outcome if students discontinue because they realise that higher education is not right for them and wish to pursue a different path. Using such a metric could create a perverse incentive for institutions to keep students on programmes or to pass students who have not met the relevant requirements purely for the sake of the TEF assessment even if this is not in the interests of those students. This would lower academic standards, would not be in the interests of students or graduates, and would harm the reputation of the UK higher education sector.

c) Student satisfaction indicators

Student satisfaction is not a real measure of teaching quality, as it is possible that students who have been spoon-fed material for examinations may give higher satisfaction ratings than students on very intellectually challenging courses which are likely to prepare them better for careers post-university. As referenced under Question 9, there is also a concern that if the TEF assessment is mechanistically linked to tuition fee levels, using NSS scores could create a perverse incentive for students not to score their institution highly on the NSS if higher student satisfaction scores will result in increased fees for their successors.

If benchmarks are to be included alongside metrics, this must be done in a sufficiently transparent way. For example, currently the benchmarks produced for the UK Performance Indicators are not transparent enough for institutions to be able to replicate their benchmarks in order to understand their performance. Clear and precise information on how any benchmarks are calculated would greatly increase the usefulness of metrics. In relation to this, the difficulties that would be caused by the proposal to break down metrics by disadvantaged groups and then adjust them to take account of the different proportions of various disadvantaged groups at different institutions are discussed in detail under Question 12 below.

As acknowledged by the Green Paper, future metrics on engagement and learning gain must only be included “once they are sufficiently robust and available on a comparable basis”. In particular, the College would be concerned about a metric on teaching intensity based on time spent studying as measured through the UK Engagement Surveys, as these often have low response rates and are self-reported by students. In addition to this, information on time spent studying is not an indicator of teaching excellence alone if there is no context as to how those hours are spent. As more and more teaching comes to use technology, institutions may be able to mine data on students’ engagement with different technology and students’ use of internet teaching materials to explore student engagement and learning gain in more depth.

It is very unlikely that metrics alone will be able to provide an accurate depiction of teaching excellence, and the piloting of any TEF methodology recommended under Question 5 and elsewhere above should include qualitative evidence on how institutions provide excellent teaching relevant to their student profile and type of provision.

Social mobility and widening participation (Part A: Chapter 4)

Question 12:

a) Do you agree with the proposals to further improve access and success for students from disadvantaged backgrounds and black and minority ethnic (BME) backgrounds?

Yes

No

Not sure

Please give reasons for your answer.

The College is fully supportive of the aims of improving access and success for students from disadvantaged backgrounds, and is committed to taking students from all walks of life and through excellent teaching transforming them into the scientists, engineers and doctors of the future. However, the proposals set out in the Green Paper to achieve this through the TEF are unlikely to be effective. If implemented, they could in fact mark a backward step in the sector's efforts to widen participation and support access and success.

The key issue with the proposals on access and success made in the Green Paper is the way in which they have been mixed up with the proposals for the TEF, when it would make more sense for the two areas to be considered separately. In particular, the representation of different groups within an institution ("access") is not related to the quality of teaching at that institution. The suggestion in the Green Paper that providers who wish to apply for TEF assessments will as a pre-condition have to fulfil widening participation expectations in recruiting students from disadvantaged groups is, therefore, not appropriate. It could also result in perverse incentives for institutions to engage in practices that would not support social mobility and widening participation over the longer term. For example, an institution might go to desperate lengths to incentivise prospective students from particular backgrounds to enrol so that it can enter the TEF assessment, regardless of whether enrolling at that institution is in the best interests of those students. Such an approach would also encourage a short-term approach to outreach activities. For example, an institution might be forced to focus outreach activities at groups it has to enrol in order to participate in one TEF assessment, and then quickly shift these activities to other groups for the next TEF assessment. This would both undermine existing outreach programmes and go against the strong evidence presented in the National Strategy for Access and Student Success that "long-term, sustained outreach programmes are crucial to success in widening participation"⁶.

It is also important to note, as the Green Paper recognises, that prior educational attainment is a major factor in determining progression to higher education. This means that in order to increase significantly the pool of young people from disadvantaged backgrounds who are qualified to undertake university-level study, interventions will need to take place much earlier on in the education system, ideally from primary school level upwards as recommended by OFFA⁷. In the College's experience, it would be particularly helpful to focus these interventions on STEMM subjects to increase the take-up of and attainment in these subjects by disadvantaged groups. These interventions should be supported by the Government as part of a joined-up strategy across all levels of education, and will need to take place over a much longer timeframe than the proposed TEF assessment period. Without such interventions, the proposals made to include in the TEF measures on the

⁶ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/299689/bis-14-516-national-strategy-for-access-and-student-success.pdf.

⁷ <https://www.offa.org.uk/press-releases/offa-asks-universities-and-colleges-to-do-more-work-with-schools-and-communities-to-raise-aspirations-and-attainment/>

representation of disadvantaged groups within higher education institutions risk driving an unproductive form of “competitive outreach”, with institutions fighting over the same small pool of qualified young people from disadvantaged backgrounds. This would certainly not be in the interests of these young people or of those outside this pool.

With regards to the success of students from disadvantaged backgrounds once they have enrolled in higher education, there are stronger grounds for considering this in the context of the TEF assessment. However, this is an extremely complex area and it is not at all clear that institutions’ performance in this area can be effectively or appropriately measured by the use of quantitative metrics. The HEFCE-commissioned report on the causes of differences in student outcomes that is referenced in the Green Paper found four explanatory factors for differences in student outcomes: (a) curricula and learning, including teaching and assessment practices; (b) relationships between staff and students and among students, with a sense of “belonging” a key determinant of student outcomes; (c) social, cultural and economic capital; and (d) psychosocial and identity factors, including the extent to which students feel supported and encouraged in their daily interactions within their institutions and with staff members⁸. These factors, and the actions which institutions are taking to address them, would be much more appropriately measured through a qualitative narrative on how institutions are supporting teaching excellence. In addition to this, it should be noted that sector-level trends can mask significant variation at institutional level. It should not be assumed in the TEF that groups who tend to achieve worse outcomes at sector level would also do so at every institution.

The issues that would be caused by attempting to apply quantitative metrics to this area as part of a TEF assessment are demonstrated by the suggestion in the Green Paper that metrics on retention and success should be adjusted in some way to account for the fact that students from some disadvantaged backgrounds tend not to perform as well as other students across many outcome measures, so that institutions with high proportions of these students are not “penalised” in the TEF assessment. Rather than accepting such differences in outcomes as inevitable and artificially adjusting quantitative metrics to account for them, it would be more beneficial to focus on the actions that institutions are taking to support the success of all their students, including those students from disadvantaged backgrounds, through a qualitative narrative. This would apply to all institutions regardless of the proportions of different groups in their student bodies, and would also help to prevent perverse incentives for institutions to engage in practices such as keeping struggling students on their courses in order to meet retention targets even in cases where it would be more beneficial for those students to pursue alternative paths, and awarding degrees to students who have not met the required academic standards in order to meet degree attainment targets, thus devaluing the quality of degrees. Institutions would of course still be able to include any relevant data on the retention and success of disadvantaged groups as supporting evidence in their qualitative statements on teaching excellence where appropriate. It should also be noted that institutions already provide details and evidence on their work in this area as part of their Access Agreements.

The Government should also consider that making the TEF too “parochial” by incorporating local policy issues which are not specifically related to teaching excellence will make it more difficult for overseas students considering study in the UK to understand the basis on which the assessments are made. This will lessen its usefulness as a tool for demonstrating teaching excellence in order to attract and recruit overseas students (or, indeed, students from the UK in some cases). Ideally, any system of assessing teaching excellence would enable international benchmarking.

⁸http://www.hefce.ac.uk/media/HEFCE_2014/Content/Pubs/Independentresearch/2015/Causes_of_differences_in_student_outcomes/HEFCE2015_diffout.pdf (page iii).

b) *Do you agree that the Office for Students should have the power to set targets where providers are failing to make progress?*

Yes

No

Not sure

Please give reasons for your answer.

Allowing the Office for Students to have the power to set targets for providers on widening participation goals would both seriously threaten institutional autonomy and risk damaging much of the already excellent work that is currently being undertaken across the sector.

In relation to access activities, allowing institutions to identify their own priorities and targets empowers them to shape their strategies based on an assessment of their strengths and weaknesses and their local context, informed by the expertise of their practitioners. This flexible, effective approach enables a diversity of approaches which reach many different disadvantaged groups across the country. It also assists the building up of the kind of long-term, sustained outreach activities that are particularly effective in supporting progression to higher education⁶. In contrast, forcing institutions to try to meet targets based on national priorities rather than on their own institutional context would be likely to lead to increased homogenisation of activities, increasing the risk of some disadvantaged groups being missed, and undermining existing successful outreach activities. This is also the case for activities to support student success, where allowing institutions to identify their own priorities for action enables them to respond flexibly and rapidly to the changing needs of their students and implement the strategies that will be most effective within their own institutional contexts.

The additional proposal that in circumstances where institutions failed to meet the targets imposed by the Office for Students “without good reason” then the Office for Students could have the power to refuse an institution’s Access Agreement would also be counter-productive in supporting the widening participation agenda. As well as the fact that it is an unreasonably harsh penalty for institutions which prove unable to meet top-down, short-term targets set by a body which will inevitably have a more limited understanding of the institution’s context than the institution itself, the removal of an institution’s ability to charge higher fees will have a negative impact on investment in widening participation activity. For example, in 2014-15 the College spent over £7M of its additional fee income on commitments within its Access Agreement. In addition to this, institutions which teach high-cost subjects are already facing funding shortfalls in Home/EU undergraduate teaching. As discussed in more detail under Question 9 above, even with tuition fees at the £9,000 level, the College is currently making an average deficit of around £2,000 on every Home/EU undergraduate student that it teaches; a reduction in the tuition fee to £6,000 would make this financial situation even more unsustainable and have a negative impact on teaching quality as well as on investment in widening participation activities.

c) *What other groups or measures should the Government consider?*

The UK higher education sector is very diverse and different institutions face very different challenges in recruiting and supporting disadvantaged groups. As argued above, the Government should allow institutions to target activities at specific groups based on their own institutional context; the imposition of top-down targets based on national priorities is likely to have the effect of homogenising institutional activities, increasing the risk of some disadvantaged groups being missed and undermining existing successful activities.

Question 13:

- a) *What potential benefits for decision and policy making in relation to improving access might arise from additional data being available?*

In terms of making additional data available, it would be most helpful for the Government to focus on making rich national data sets more accessible to institutions to enable them to carry out more robust monitoring and evaluation of their activities. At the moment it is often difficult for institutions to understand how research that has been carried out at the sector level relates to their own institutional context, and without this understanding it is hard for institutions to implement national policy recommendations effectively. The College would particularly support the Government making UCAS data freely available to institutions so that they can, for example, track the progression to higher education of individuals who have participated in their outreach programmes.

- b) *What additional administrative burdens might this place on organisations? If additional costs are expected to be associated with this, please quantify them.*

It will be important not to add to the already considerable data collection burden on higher education institutions, and there are arguably greater gains to be made in focusing on national-level data issues such as increasing the accessibility of UCAS data and implementing a unique learner reference number across the entire education system. If higher education institutions are asked to collect data in new areas then this should be balanced by removing requirements for them to collect data in areas that are no longer of much significance.

Opening up the sector to new providers (Part B: Chapter 1)

Question 14: Do you agree with the proposed single route into the higher education sector?

- Yes No **Not sure**

Please give reasons for your answer, including information quantifying how the potential cost of entry would change as a result of these proposals.

While there are benefits to simplifying the process through which new providers can enter the higher education sector, the process should remain rigorous and thorough and must not be unduly hasty. Provision of higher education is by its nature a long-term endeavour, and making the process of entering the sector too rapid and easy risks attracting providers who are interested mainly in turning a quick profit before moving on to something else. Given the hugely negative impact that provider closures would have on their students, there are strong arguments for ensuring as far as possible that providers entering the sector are able to supply long-term, sustainable provision. It is also very important that new providers are able to supply education of a high quality, as allowing low-quality providers into the sector will have a negative impact on the students that they enrol and could also result in prospective students being put off taking the risk of studying at any new provider if a lack of rigorous controls results in new providers gaining a reputation for low-quality provision. Rigorous controls will also help to maintain the strong reputation that UK higher education currently enjoys globally.

The Government should be cautious about extending student loan eligibility to new providers entering the sector without appropriate controls to manage the cost of this and to ensure that any rapid expansion is not at the expense of quality. Lessons should be learned from the poorly-managed expansion of the alternative provider sector over the past few years. For example, the recent investigation of the Public Accounts Committee into financial support for

students at alternative higher education providers⁹ found that between 2010-11 and 2013-14, the number of students claiming support for courses at alternative providers rose from 7,000 to 53,000 and that over the same period the total amount of public money paid to students at alternative providers through tuition fee loans and maintenance loans and grants had risen from around £50M to around £675M. The same report also raised concerns about the quality of some provision, finding that: 20% of students receiving funding were not registered for a qualification; drop-out rates were very high in some institutions; and whistle-blowers had provided evidence that proficiency in English language was not tested, that some institutions were recruiting students on the streets, and that students claiming funding were not attending colleges.

Question 15:

a) *Do you agree with the proposed risk-based approach to eligibility for degree awarding powers (DAPs) and university title?*

Yes

No

Not sure

Please give reasons for your answer.

The proposed approach to eligibility for degree awarding powers (DAPs) and university title for new entrants to the higher education sector is not rigorous or thorough enough to ensure that high standards are maintained. Of particular concern are the following:

- i. The proposal that the current four year track record requirement for DAPs be reduced to three years means that there would be less time for a robust evidence base to be built up to support an application for DAPs. This increases the risk of DAPs being awarded inappropriately, which would have a negative impact on the students involved and on the reputation of the UK higher education sector.
- ii. The proposal to introduce more flexibility on what constitutes track record for the purpose of awarding DAPs, for example taking account of models other than the traditional validation route, overseas track record, and the track record of individuals within the institution, risks awarding DAPs without appropriate evidence of providers' ability to sustain long-term and high-quality provision within the UK higher education sector. It is particularly difficult to see how the previous track record of individuals within the institution would supply any evidence about that institution's ability to deliver high-quality provision.
- iii. The proposal to reduce or remove the student numbers criterion for university title risks encouraging the proliferation of a large number of very small "universities" and causing confusion for prospective students. Providers with fewer than 1,000 students (FTE) are unlikely to be able to provide the kind of broad academic community that students at larger providers benefit from, and this should be made clear to prospective students by retaining the distinction between a university and a university college.

b) *What are your views on the options identified for validation of courses delivered by providers who do not hold DAPs?*

The Government should be extremely cautious about giving DAPs to non-teaching bodies in order to "widen options for validation", as non-teaching bodies generally do not have the academic community that is critical to safeguarding standards. Such an option therefore risks the lowering of degree standards, which would not be a good return on public investment and would have a negative impact on the quality and reputation of the UK higher

⁹ <http://www.publications.parliament.uk/pa/cm201415/cmselect/cmpublic/811/811.pdf>

education sector. The principle set out in the Government's criteria for the award of DAPs¹⁰ that "the criteria are designed to establish that your organisation is a well-founded, cohesive and self-critical academic community that can demonstrate firm guardianship of its standards" should be rigorously maintained.

Question 16: Do you agree with the proposed immediate actions intended to speed up entry?

Yes **No** Not sure

Please give reasons for your answer.

Entry to the sector should not be speeded up at the expense of evidence-based decision-making and demonstrated track record. It is not in the interests of students, the Government, or the wider higher education sector to allow poor-quality and financially unsustainable providers rapid access to the sector. The proposal to reduce the requirement for providers to demonstrate a track record of financial performance from three years to two years is particularly dangerous in this regard. As the Green Paper itself notes, this would allow for a very limited view of sustainability over time. The risks of allowing financially unsustainable providers into the sector far outweigh the benefits of allowing providers to enter slightly earlier. Indeed, it could be argued that the current requirement of three years' track record of financial performance is not sufficient to demonstrate long-term financial sustainability.

Any relaxations in student number controls for alternative providers should be managed very carefully to ensure that the costs are controlled and that any expansion is not at the expense of quality.

Provider exit and student protection (Part B: Chapter 2)

Question 17: Do you agree with the proposal to introduce a requirement for all providers to have contingency arrangements to support students in the event that their course cannot be completed?

Yes **No** Not sure

Please give reasons for your answer, including evidence on the costs and benefits associated with having a contingency plan in place? Please quantify these costs where possible.

In general, it is important that requirements for contingency plans are risk-based and recognise the variation in risk of exit for different providers.

The College would agree that in the cases of course or campus closure, providers should have in place contingency arrangements to support students. Given the large number of courses in operation at any one time, producing separate plans for each individual course would be hugely burdensome from an administrative perspective and would provide little additional benefit for students. A better approach would be for providers to set out the principles which they will apply to support students in the event of a course or campus closure, perhaps along the lines of the recently launched statement of good practice on

¹⁰ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/459815/BIS-15-525-degree-awarding-powers.pdf (page 15).

higher education course changes or closures¹¹. This would cover alternative provision and financial recompense.

The Green Paper suggests that the Office for Students could provide assistance for struggling providers if it is in the public interest to do so. It is, however, not indicated how such assistance is planned to be funded. It will be important that other institutions are not required to bear the cost of supporting struggling providers, as this: (a) would have the effect of forcing thriving institutions to divert funding from supporting their own high quality provision to subsidise other institutions which may be offering lower quality provision and/or which may have made poor financial decisions; and (b) could have the undesirable knock-on effect of causing institutions that are in poorer shape financially to fail themselves by forcing them to divert funding from their core operations. If it is in the public interest to support struggling providers then this support should be funded by the Government.

Simplifying the higher education architecture (Part C)

Question 18:

a) *Do you agree with the proposed changes to the higher education architecture?*

Yes No **Not sure**

Please give reasons for your answer.

The complete separation of teaching funding from research funding proposed in the Green Paper is a concern, as is the lack of clarity on where knowledge exchange funding will sit. Teaching, research and knowledge exchange are very closely linked together and mutually beneficial, so it is helpful that HEFCE is currently able to take a strategic view across the whole of the sector's activities. There is a risk that policies and funding around research, teaching and knowledge exchange will become increasingly fragmented, making it more difficult for institutions to co-ordinate and carry out these functions effectively.

b) *To what extent should the Office for Students (OfS) have the power to contract out its functions to separate bodies?*

Fully **Partially** Not at all

c) *If you agree, which functions should the OfS be able to contract out?*

The Office for Students should continue to be able to contract out its quality assurance function, either to the QAA or in line with other arrangements that are put in place, and its data collection function to HESA. Both these organisations have considerable expertise built up over a number of years. It should be noted that the higher education landscape is extremely complex and that there are unlikely to be many organisations capable of fulfilling the functions of the Office for Students effectively. Contracting out many functions is also unlikely to assist the Government's goal of simplification. In addition to this, from an institutional perspective, continuity and consistency of processes across years is helpful in reducing burden. This is particularly the case for data collection, where consistency also has the benefit of making it easier to undertake research on areas such as widening participation.

d) *What are your views on the proposed options for allocating Teaching Grant?*

¹¹http://www.hefce.ac.uk/media/HEFCE,2014/Content/Regulation/Student,protection/Statement_good_practice.pdf

Option 1: BIS Ministers set strategic priorities and BIS officials determine formula.

Agree

Disagree

Not sure

Option 2: BIS Minister sets strategic priorities and allocation responsibilities divested to OfS

Agree

Disagree

Not sure

Please give reasons for your answer.

It would be wholly inappropriate for the responsibility for determining and administering this formula and the allocations for individual universities to lie within BIS. It should be the responsibility of the Office for Students, with oversight from an independent board to avoid allocations reflecting political considerations. By whatever means strategic priorities are agreed, there should be full transparency so that the reasons for such decisions are clear (e.g. making minutes of meetings public, etc.).

A key priority of funding teaching in higher education should be to ensure that the quality and reputation of UK higher education is maintained and enhanced. In order to achieve this, it is imperative to ensure that institutions are able to recover the full costs of teaching, particularly in relation to high cost STEMM subjects. As discussed under Question 9 above, despite the increase in the maximum tuition fee level in 2012-13, the College is continuing to experience a deficit in Home/EU undergraduate teaching in high cost STEMM subjects which has grown as tuition fee levels have not increased with inflation (£9,000 in 2012 is equivalent to £8,460 in 2015¹²). The College is currently making an average deficit of around £2,000 on every Home/EU undergraduate student. Any increases in tuition fee income in line with inflation would simply be used to cover inflationary increases in costs, at best maintaining this deficit. The provision of high-quality, research-led STEMM education is resource-intensive by its very nature and necessitates expensive facilities and the use of high cost consumables. If the combination of teaching grant and tuition fee income continues to be constrained below full cost, this will result in Home/EU undergraduate STEMM provision becoming increasingly unsustainable. Institutions may be forced to reduce their Home/EU undergraduate numbers further and further, not on the basis of poor quality, but because of severe under-resourcing. This would lead to less choice and diminishing opportunities for Home/EU students in STEMM disciplines, and to a wider impact on the UK economy where there is already a shortage of suitably qualified STEMM graduates⁴.

There is also a higher cost in providing teaching in London due to the cost of living in London being significantly greater than in other regions of the UK. This results in a need to pay higher salaries to attract staff who can deliver high quality teaching, and to provide a greater level of financial support to students.

As Home/EU undergraduate tuition fee levels are not sufficient to cover the costs of teaching high cost STEMM subjects, there will continue to be a need to provide additional funding via teaching grant at a level sufficient to cover the additional costs of teaching high cost subjects, and the significant additional costs of operating in London. These principles are broadly reflected within the existing teaching funding formula, which is based on the volume of students and funding rates derived from the cost of teaching, with an additional weighting for teaching in London. There would, therefore, be no benefit (and could be substantial

¹² Based on changes in the RPI Index between September 2012 and September 2015:
<http://www.ons.gov.uk/ons/datasets-and-tables/data-selector.html?cdid=CHAW&dataset=mm23&table-id=2.1>

disruption) in making significant changes to the existing formula or to where responsibility for operating this formula lies.

Question 19: Do you agree with the proposal for a single, transparent and light touch regulatory framework for every higher education provider?

Yes

No

Not sure

Please give reasons for your answer, including how the proposed framework would change the burden on providers. Please quantify the benefits and/or costs where possible.

The College would broadly support the proposal in the Green Paper that the Office for Students should be required to publish a risk-based regulatory framework limiting monitoring for low-risk providers. However, it will be important to ensure that the regulatory framework for higher risk providers is sufficiently rigorous to uphold the interests of students and the reputation of the UK higher education sector.

When designing this regulatory framework, it will be important to ensure that it is sufficiently flexible for institutional diversity to be taken into account. For example, the Green Paper suggests that as part of the framework the Office for Students will ensure that providers who have students accessing student support meet conditions on fee caps, access, financial sustainability, management and governance. It may well not be appropriate to apply the identical conditions for all these areas to every provider in the sector. The Office for Students should apply these conditions sensibly while at the same time ensuring that conditions are particularly rigorous for new providers and for those who have been identified as being high risk. Providers that are demonstrably low risk should have “earned autonomy”, with a lower regulatory burden.

The College would strongly support the Government’s proposal to include in the regulatory framework an explicit duty for the Office for Students to respect academic freedom and institutional autonomy.

Question 20: What steps could be taken to increase the transparency of student unions and strengthen unions’ accountability to their student members?

It is unlikely that any steps taken by the Government would be at all helpful in this regard. The comparison made in the Green Paper between students’ unions and trade unions is also inappropriate, as they are different types of organisation and are not directly comparable.

Students’ unions play a vital role in supporting students during their time at university and in representing their views. The College has a very constructive relationship with its own students’ union, Imperial College Union (ICU), as outlined also in ICU’s response to this consultation. ICU sabbatical officers are democratically elected by student ballot, and ICU has formal representation on College decision-making committees. The College works collaboratively with ICU representatives to achieve outcomes that are in the best interests of students. For example, in early 2015 the College and ICU worked together to develop several different options for the price structure of rents in the College’s student halls. These options were voted on by the ICU Council, and ICU’s preferred option is now being implemented. ICU has also developed a consultation framework which sets out agreed procedures for consultation with students and helps to ensure ongoing and helpful discussions between staff and students around any changes that may affect students. This kind of collaborative working relationship is much more productive than a more adversarial, negotiation-based approach to university and students’ union relations. The Government

should recognise this and be careful not to introduce any reforms which might threaten relationships of this kind.

Question 21:

a) *Do you agree with the proposed duties and powers of the Office for Students?*

Yes

No

Not sure

Please give reasons for your answer.

It would not be appropriate for the statutory duty of the Office for Students to be to act solely in the interests of students. Other factors, such as the need to promote academic excellence and financial sustainability, and to meet the needs of business and society, should also be taken into account. Universities arguably owe a duty not only to their current students, but also to their alumni (the value of whose degrees depends to some extent on the ongoing reputation of the university), and to future students (whose educational experience is dependent upon the university being run in a sustainable manner in the current day).

Please see the responses to Questions 18-19 for other comments on the proposed duties and power of the Office for Students. Of particular concern is the potential lack of joined-up thinking around teaching, research and knowledge exchange under the proposed new higher education landscape. It is also essential that the institutional autonomy of providers and the academic freedom of their staff are respected.

b) *Do you agree with the proposed subscription funding model?*

Yes

No

Not sure

Please give reasons for your answer.

It should be noted that the proposal that the Office for Students will be “explicitly designed to support the student interest” raises the potential for conflicts of interest within the Office for Students between its proposed funders (providers) and its proposed “customers” (students), as well as the Government (if it is seeking to implement policies through the Office for Students that are not in the interests of students).

If institutions are required to contribute to the costs of the Office for Students, there would need to be a mechanism in place through which institutions can determine overall subscription charges and ensure that they are receiving value for money in relation to any subscription charges paid. This could be done, for example, through a board of stakeholders representing those funding the Office for Students.

Question 22:

a) *Do you agree with the proposed powers for OfS and the Secretary of State to manage risk?*

Yes

No

Not sure

Please give reasons for your answer.

With the exception of inflationary increases, the Secretary of State should not have the power to set tuition fee caps without this going through Parliament. It is essential that changes to tuition fee caps are decided by the elected Members of Parliament.

The College would strongly support the proposal that the Secretary of State should have a duty to respect the institutional autonomy of providers and the academic freedom of their staff.

b) What safeguards for providers should be considered to limit the use of such powers?

There are few details given in the Green Paper about how such powers of managing risk will operate in practice. Without these details, it is difficult to comment on the safeguards that should be considered for providers. The Government should issue a full draft of these proposed powers to enable informed consultation with the sector.

Question 23: Do you agree with the proposed deregulatory measures?

Yes **No** **Not sure**

Please give reasons for your answer, including how the proposals would change the burden on providers. Please quantify the benefits and/or costs where possible.

The College welcomes the Government's consideration of deregulation in relation to the obligations placed upon HEFCE-funded providers arising from the Freedom of Information Act (FOIA). As recognised in the Green Paper, the current situation, where HEFCE-funded providers are treated as "public bodies" but alternative providers are not, has resulted in an uneven playing field where alternative providers are at a significant advantage.

There is no doubt that, in the case of the College at least, compliance with the FOIA has become increasingly burdensome both in terms of staff time and in terms of cost. Although in the early years of the FOIA compliance was manageable, with around 60-70 requests a year, since 2010 the number of requests received has been steadily increasing. 2014 saw the College receive almost 400 separate FOI requests. In addition to this, the requests themselves have become more complex, frequently involving a number of different departments with the requested information often not quickly retrievable (but not falling outside the cost limit). As a result, the College has had to increase its resource for managing requests. There has also been an increase in the number of responses that have been challenged by requesters, which means that the requests have to be considered for a second time as part of the internal review process. Internal reviews are conducted by senior staff, and the increase in the number of these has increased the burden on these staff members, taking their time away from their core responsibilities. On a few occasions the College has also incurred significant cost where it has had to obtain external legal advice to deal with individual FOI requests.

There is evidence that across the sector universities have experienced an increased burden from compliance with the FOIA. For example, a 2014 JISC survey found that the number of FOI requests received by UK universities had risen by 43% since 2012 and by 147% in the last five years¹³. A research project conducted by JISC in 2012 estimated that at that time it cost £144.93 for institutions to respond to each request received¹⁴, a conservative estimate in the College's experience.

The College is committed to being open and accountable and recognises that some requests are made in the public interest in order to hold the College to account. However, many requests are made for spurious reasons, or for the narrow commercial benefit of the requester. Such requests have little or no public interest benefits and are only submitted for

¹³ <https://www.jisc.ac.uk/news/freedom-of-information-requests-received-by-uk-universities-continue-to-rise-21-mar-2014>

¹⁴ <https://www.jisc.ac.uk/blog/ever-wondered-how-much-freedom-of-information-costs-the-sector-04-mar-2013>

the individual gain of the requester. For example, the College receives frequent information requests from commercial organisations for details of current contracts with third party suppliers in their field (for the apparent purpose of hoping to secure later their own contract with the College). The College is obliged to fulfil these requests and they can take up valuable staff time and effort. Another recent request asked the College to provide “any information (evidence) that you hold which would disprove the concept that energy is a minute subatomic particle with minute mass”, a question which is scientifically invalid and almost impossible to answer, but which must nevertheless be dealt with as a serious request for information. The burden of answering such requests far exceeds any possible public benefit.

The College is committed to openness and transparency, and would propose that if universities are made exempt from the Freedom of Information Act, they should continue to publish a selection of appropriate information agreed in consultation with the sector. Universities are also subject to rigorous scrutiny and monitoring of their teaching and research activities through measures such as academic peer review of journal articles, assessment of research quality through the Research Excellence Framework (REF), assessment of educational standards and quality through the Quality Assurance Agency (QAA), and the provision of statistical information to bodies such as the Higher Education Statistics Agency (HESA), which makes much of the information collected available in the public domain.

Should the outcome of the consultation be that it is in the interests of students and the wider public to keep HEFCE-funded providers subject to the FOIA, the College would welcome consideration of ways in which the burden could be reduced. One option would be a reduction of the cost limit. Currently the cost limit for universities is £450, calculated as 18 hours of work (location, retrieval and extraction of the information). A reduction in the cost limit from £450 to £250 (10 hours of work) would mean that the most burdensome of requests could legitimately be refused. Additionally, the cost limit currently does not take any account of the time required to determine how to deal with a request, to consider any exemptions that should be applied, to redact exempted information, or to carry out the public interest test. The inclusion of these often burdensome activities in what is considered to fall under the cost limit would ease the administrative burden for universities considerably. Another alternative approach, proposed above, would be for HEFCE-funded providers to continue to publish a selection of appropriate information agreed in consultation with the sector, but to exempt these providers from having to respond to FOI requests for other information. Any arrangements should apply equally to alternate providers.

Reducing complexity and bureaucracy in research funding (Part D)

Question 24: In light of the proposed changes to the institutional framework for higher education, and the forthcoming Nurse Review, what are your views on the future design of the institutional research landscape?

The changes to the research landscape discussed within the Nurse Review are fundamental and the Government will need to undertake a full consultation with the sector to ensure that there are no unintended and/or undesirable consequences. In particular, care will be needed to ensure that any changes to the research landscape do not act counter to the commitments stated within the Green Paper to the Haldane Principle and dual support funding system, which the College fully supports.

Awarding research funding according to the Haldane Principle on the basis of excellence is the most effective way to secure the maximum economic and wider benefits. Research priorities, including capital priorities, must be established in a transparent process that

involves the research community, potential user communities, and other key stakeholders. In recent years there has been a trend for funding to be distorted by significant investment in specialised areas awarded on very short timescales, without open competition and outside the usual peer review mechanisms. The College would welcome more transparency, and longer-term planning to weigh the benefits of such investments against the wider portfolio would be desirable. Decisions on funding research and on where research takes place must remain independent from politically driven decision-making in order to ensure the long-term sustainability of the UK research base and its international competitiveness. Many decades of experience of research funding have shown that it is simply not possible to predict where the next revolutionary idea will spring from (e.g. the World Wide Web emerged from CERN research on particle physics), and at a national level we therefore need to support excellent research across all core disciplines to ensure that (a) we can attract and develop the best researchers internationally, who will be the people generating the game-changing ideas of the future, and (b) we have the scientific and engineering capability to take advantage of new ideas emerging at the frontiers of research.

The dual support system of funding research in universities is therefore of critical importance in sustaining the international excellence of the UK research base by enabling institutions to carry out the type of blue skies research that is not always readily funded but can lead to significant innovation and impact. If the administration of both streams is to be undertaken by the same organisation in the future, it will be essential to establish very strong safeguards to ensure that the distinction between the two streams is not eroded in the medium to long term.

Question 25:

a) What safeguards would you want to see in place in the event that dual funding was operated within a single organisation?

The budget for the organisation distributing dual support funding would need to be completely transparent, with funding for each stream and the precise constituents of each stream clearly identifiable and directly comparable from year to year.

Separately ring-fencing each stream within the dual support system is needed to avoid the separation of the two funding streams being eroded over time. It would also be necessary to ring-fence the constituents of each stream to avoid the scope of any ring-fence expanding over time by “tucking in” new and additional areas, which would serve to dilute core funding.

In order fully to maintain the integrity of the dual support system, there would need to be concrete reassurances on maintaining the balance of funding across the two streams and on the mechanism through which the dual support system would be maintained under the new arrangements. This could include, for example, locking the separation of the two different funding streams into any governance arrangements, ensuring that decisions about funding across the dual support system are taken at arms-length from Government, and allocating funding on the basis of excellence through an independent process. It would be helpful if these safeguards could be enshrined in law.

b) Would you favour a degree of hypothecation to ensure that dual funding streams, along with their distinctive characteristics, could not be changed by that organisation?

Yes

No

Not sure

Please give reasons for your answer.

Each dual support stream should be separately ring-fenced and hypothecated to the extent that the distinctive characteristics of each stream are protected. The QR funding stream should also be hypothecated to ensure that the different elements are retained, in particular mainstream QR (plus the London weighting), charity QR, business QR, and research degree programme (RDP) QR. However, the way in which universities can use QR funding should continue to be un-hypothecated to ensure that institutions have the resources to drive innovation, invest in new and emerging areas, support new talent and protect important research areas.

It is essential that QR funding continues to be allocated on the basis of excellence and that the method employed to distribute QR accurately reflects the full costs of conducting cutting-edge research in STEMM disciplines. There is a structural problem in the current method used to calculate QR which is caused by the relative subject funding weightings not recognising the extent of the difference in the cost of conducting cutting-edge STEMM research compared to the cost of social sciences and humanities research. Currently the funding ratio is 1.6:1; however, there is evidence to suggest that STEMM research costs between 3 and 4 times as much as research in social sciences and the humanities¹⁵. This has previously been partially compensated for by HEFCE providing additional QR funding for STEMM disciplines; however, this protection was removed in 2015-16.

Specific QR funding reflecting the levels of charity and business research income remains essential to supporting the continued leverage by universities of resources from these sources. It is a priority for sustaining the UK research base that these resources continue to make a substantial funding contribution; for example, without the support of charity QR funding universities might not be able to undertake charity-funded research as the gap between the funding provided and the full economic cost of undertaking the research would be greater. In addition to this, major charities are incentivised to fund research in the UK because they do not have to pay indirect costs; if the Government removed this support then these charities might well fund research overseas instead, which would be a significant blow to the UK research base. It will also be important to maintain the RDP element of QR to support the adequate funding of PhD provision, and to continue to recognise the additional costs of conducting research in London (e.g. higher staff costs resulting from the cost of living in London being significantly greater than other areas of the UK) within the formula.

It will also be important to maintain a funding mechanism for supporting universities' capacity to engage with industry. The College would support the recommendation within the Dowling Review¹⁶ that the Government maintains a form of flexible funding for knowledge exchange as a means of stimulating translational activity and collaboration. Higher Education Innovation Funding (HEIF) has been proven to be particularly effective in helping universities to translate research ideas, knowledge and technology strengths into both economic and social impacts; for example, recent research reports have estimated the average return on HEIF investment across the sector to be £9.70 in benefits for the economy and society for every £1 invested, and considerably more when it is invested in the most research-intensive universities¹⁷. The flexibility and longer-term nature of HEIF funding is also helpful, as fragmented and unpredictable funding makes it harder to develop research strategically and translate it to impact. For industry-sponsored research there is an opportunity cost associated with the effort entailed in building and maintaining industry relationships, and

¹⁵ See the review into research cost relativities based on Transparent Approach to Costing (TRAC) undertaken by JM Consulting LLP:

http://webarchive.nationalarchives.gov.uk/20120118164921/http://hefce.ac.uk/pubs/rdreports/2011/rd09_11/

¹⁶ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/440927/bis_15_352_The_dowling_review_of_business-university_research_collaborations_2.pdf

¹⁷ <http://www.hefce.ac.uk/pubs/rereports/Year/2015/heifeval/Title.105779.en.html>

reductions in HEIF funding would make it more difficult for institutions to support those activities.

Question 26: What are the benefits of the REF to a) your institution and b) to the wider sector? How can we ensure they are preserved?

The outcomes of previous research assessment exercises in the UK have the overall trust of the sector. They have provided important indicators about, and been essential to driving up the quality of, the UK research base and the subjects and institutions within it. A broader benefit has been the introduction of the impact element, which has yielded useful insight into the wider social and economic achievements of research. In addition to this, submitting to the REF yields strategic intelligence about institutional and departmental performance through external scrutiny and benchmarking which complements ongoing performance management. The REF can also act as a catalyst for setting up beneficial systems and procedures, which then continue beyond the lead-up to the assessment. In addition to this, the REF provides an independent quality assessment of an institution's / department's research which itself is valuable in attracting funding from industry and other non-Government sources.

Research assessment in some form is essential for measuring the success of UK higher education institutions. The main policy objective of research assessment must be that any exercise is able sufficiently to recognise and assess the highest quality research and to fund it accordingly. In this respect, in order for research assessment to remain credible and to enable useful comparisons across exercises, it is important to ensure that the assessment levels for subsequent exercises are comparable to historic exercises; adding further categories (such as a 5* category) will simply result in grade inflation. In addition to this, the primary purpose of the REF – to measure the quality of research at UK institutions – must not be diluted. For example, the new open access policy for the post-2014 REF risks outputs being selected based primarily on whether or not they are open access, rather than by a judgement of quality.

Research assessment should be sufficiently regular to reflect current performance but not put excessive strain on institutions such that it negatively impacts their core research activity. An exercise run approximately every 6-7 years, as has been the case in the past, is an appropriate balance. It would not be helpful to “refresh” results or run “mini-REFs” in between main REF assessments as the research landscape will not have changed significantly over a period of 3 years and so any changes in results are likely to be caused by changes in the assessment method rather than reflecting real changes in research quality. Such an approach would also be disruptive to core research activity, introduce instability in QR funding, and add to the cost and burden of research assessment.

Research assessment must mirror normal research incentives for institutions and should not (intentionally or unintentionally) be used to change institutional behaviour. In addition to this, the preparations for research assessment must not hinder the global success of UK research institutions that are competing in an international market against competitors who have no such obligation.

Question 27: How would you suggest the burden of REF exercises is reduced?

As noted above in Question 26, the main policy objective of research assessment must be that any exercise is able sufficiently to recognise and assess the highest quality research and to fund it accordingly. Secondary to this is the desire to reduce the institutional (administrative and academic) and panel burden, though it should be noted that making radical changes to the exercise would be likely to increase the burden on institutions. The College would broadly support the continuation of the REF in a similar format to REF2014,

including the broad balance between outputs, impact and environment, though would encourage panels to consider further use of peer review moderated metrics for those disciplines that would suit such an approach. Any approach must, however, preserve the trust the sector has in the outcomes of research assessment exercises, and should not incentivise behaviour that is contrary or potentially damaging to normal research practice.

The impact of research is not easily measured by metrics as these tend to measure the input to and not the output from the impact, and vary significantly by individual case study. However, the inclusion of impact case studies and impact templates in REF2014 significantly increased the narrative (academic) burden on institutions. Whilst this was manageable, there should be no increase in burden (such as an increase in the number of case studies required), and opportunities for reducing burden should be taken where they do not compromise the overall robustness of the assessment process. In particular, it should be recognised that the impact of research is ongoing and will in many cases span multiple assessment periods, meaning that it should be possible to re-submit existing case studies in future assessments of research excellence so long as the impact over the new assessment period is articulated.

It is important that the research environment continues to form a core component of the REF in order to measure prospectively the longevity and sustainability of future research and its quality. There is, however, scope for simplification within this section via a more structured template which seeks verifiable quantitative information alongside qualitative contextual information provided in bullet point and/or text-limited format rather than free prose. In addition to this, now that research impact is more embedded within the sector there is no need for a separate impact template; relevant information on context, approaches to impact, strategy and plans, and relationship to case studies could simply form one part of the environment template.

Between RAE2008 and REF2014, there was a significant re-organisation in the panel structure which resulted in a reduction in the number of main panels from 15 to 4, and a reduction in the number of sub-panels from 67 to 36. Any significant further consolidation of sub-panels, particularly any merger into a single sub-panel of engineering, would undermine the effectiveness of the REF, both on the grounds of the manageability of the larger sub-panels that would be needed to ensure comprehensive expertise and through undermining the strategic function of the REF of providing a national overview of the health of individual disciplines.

Question 28: How could the data infrastructure underpinning research information management be improved?

The underpinning infrastructure must be fit for the purpose of producing robust and trustworthy indicators at a reasonable cost. This can best be achieved through further systems integration and automation. To achieve this, uniform standards and identifiers are needed that work across the different systems of data collection and analysis which have proliferated over the past decade. Outputs should be associated with relevant identifiers as early as possible, i.e. from acceptance stage, to make it easy to track them through different systems and workflows. A minimum requirement would be ORCID (emerging as the global standard for research identification), DOI (minted at acceptance to enable the open access workflow required under the HEFCE REF policy) and FundREF, ideally combined with an institutional identifier and rich metadata including machine-readable licensing information. With such metadata available publicly, and early on, monitoring and reporting would be greatly improved and manual effort (administrative and academic) would be reduced. This would reduce the burden on researchers in future REF exercises when handling their submissions through multiple reporting systems.

An increased use of metrics has the potential to reduce the cost and burden of the REF, but it must be recognised that the collection of quantitative data and its processing to produce metrics and indicators is not itself cost free. Even with the relatively straightforward data sources used in REF2014, such as citation data from the Elsevier Scopus database and HESA statistics, considerable effort was required by institutions to validate, and sometimes to correct, the data (in addition to the subscription costs for the databases themselves).

Do you have any other comments that might aid the consultation process as a whole?

Please use this space for any general comments that you may have, comments on the layout of this consultation would also be welcomed.

Thank you for your views on this consultation.

Thank you for taking the time to let us have your views. We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would it be okay if we were to contact you again from time to time either for research or to send through consultation documents?

Yes

No

BIS/15/623/RF