



**Senate**

<b>Paper Title</b>	QMUL Response to Green Paper
<b>Outcome requested</b>	Senate is asked to note the response.
<b>Points for Senate members to note and further information</b>	<p>BIS published an HE Green Paper ('Fulfilling our Potential: Teaching Excellence, Social Mobility and Student Choice') in November 2015. QMUL provided an institutional response to the consultation process, drawing on discussions at fora such as SLG and Senate.</p> <p>The full Green Paper document can be found via the following link: <a href="https://www.gov.uk/government/consultations/higher-education-teaching-excellence-social-mobility-and-student-choice">https://www.gov.uk/government/consultations/higher-education-teaching-excellence-social-mobility-and-student-choice</a></p>
<b>Questions for Senate to consider</b>	Senate is asked to consider the proposals in the Green Paper and the potential impact on the sector and QMUL.
<b>Regulatory/statutory reference points</b>	It is not clear whether or when an HE Bill will come before Parliament. A number of the proposals in the Green Paper would need legislation to be enacted.
<b>Strategy and risk</b>	The Green Paper has implications for all aspects of QMUL's activity and the full range of its Strategic Aims and Objectives.
<b>Reporting/consideration route for the paper</b>	The consultation was submitted further to discussions at QMSE, Senate and SLG, amongst other fora.
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## Department for Business, Innovation & Skills

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

You can reply to this consultation online at:

<https://bisgovuk.citizenspace.com/he/fulfilling-our-potential>

A copy of this response form is available at:

<https://www.gov.uk/government/consultations/higher-education-teaching-excellence-social-mobility-and-student-choice>

The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

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

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Please tick the box that best describes you as a respondent to this consultation.

	Alternative higher education provider (with designated courses)
	Alternative higher education provider (no designated courses)
	Awarding organisation
	Business/Employer
	Central government
	Charity or social enterprise
	Further Education College
<b>x</b>	Higher Education Institution
	Individual (Please describe any particular relevant interest; parent, student, teaching staff etc.)
	Legal representative
	Local Government
	Professional Body
	Representative Body
	Research Council
	Trade union or staff association
	Other (please describe)

### **Introductory Comments**

QMUL welcomes the opportunity to respond to the Government's Green Paper. Ahead of our responses to the specific consultation questions, we make the following general observations:

1. Universities are complex institutions where research, teaching, and other forms of dissemination (including public engagement and commercialisation of research outputs) exist as part of a continuum of activity, with many different interconnections between different components of this academic spectrum.
2. Students are at the heart of our activity but should not be regarded solely as customers. They are co-creators of their educational experience, collaborating with, and being supported by, academic and Professional Services staff and drawing on the facilities and infrastructure of the institution. We urge that due recognition is given to these interactions, which do not mirror the 'transactional' relationships found in standard consumer environments.
3. We therefore welcome a focus on the importance of the student experience, but are concerned about the separation of the treatment of teaching and research entailed in

the proposals. These activities are not, and should not be, neatly compartmentalised in the majority of our universities, given the enriching effect on the student experience of interactions across the spectrum of academic activities.

4. Furthermore, we are concerned that the proposed architecture for the sector, reflecting the artificial split noted above, would mean that there was not one body with a holistic view of the health of individual institutions. This would reduce the likelihood of early interventions to support institutions and avoid instances of failure or poorly managed exits from provision, with potentially serious consequences for students (past and present) and the reputation of the sector.
5. We note and welcome the high-level objectives of the TEF to promote excellence in teaching. However, we have a range of concerns about the design and implementation of the exercise, relating to the potential administrative burden and its ability to accurately capture teaching quality. We would be specifically and particularly concerned by the use of metrics that were significantly influenced by factors that were largely outside of the control of individual institutions, such as the financial and social backgrounds of students, and note the difficulty of introducing effective “context dependency”.
6. We would not be supportive of a graded TEF system, which risks undermining international confidence in the UK system.
7. We urge against simplistic comparisons with the Research Excellence Framework, which has reached its present level of refinement through multiple iterations. Two points in particular are important: (i) it is widely acknowledged that quantitative assessment of teaching quality is more complex than that of research quality; (ii) the timescale for improvement (or indeed deterioration) of teaching quality is much shorter than that of research; thus the currency of a teaching assessment may be critical.
8. We view the dual support system as essential to the health of the UK’s research-base and would therefore call for a clear mechanism to separate QR funding from grants distributed via the Research Councils.

We look forward to taking further opportunities to input to the development of the Government’s proposals, in order to ensure that proposed reforms work in the best interests of students, researchers, institutions, the economy and wider society.

## 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?**

We welcome the strong focus on potential equality impacts throughout the Green Paper, not least because these can be important factors in poor student retention and success. We are pleased to see that in addition to groups with protected characteristics, other disadvantaged groups have been considered when reviewing the equality impacts of these proposals.

We note, however, that a clear distinction should be drawn between evaluating the excellence of provision by an institution and that institution’s commitment to equality issues evident from its widening access policies.

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

Yes       No       Not sure

**Please provide any further relevant evidence.**

Although the Green Paper mentions disadvantaged backgrounds in its consideration of equality impacts, we are concerned about the longer term impacts of increased costs/debts to students, which is likely to have a disproportionate impact on disadvantaged groups. This is particularly the case when considered cumulatively with other recently announced policies such as changes to DSA and the replacement of remaining maintenance grants with loans. It is also important to analyse how changes to the fees regime affect the choices and destinations of those entering HE from lower income backgrounds (for example their rates of entry into higher-tariff institutions), and not just consider overall levels of participation.

**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.**

The TEF has the potential to help inform student and perhaps employer decision making if it provides additional value over and above information already available. The TEF would need to provide robust measures (which took account of contextual influences) of teaching excellence rather than simply existing measures, which are acknowledged in the Green Paper as “imperfect proxy measures”. If only existing measures such as NSS are used then the value of the TEF for students and employers is limited.

Given the diversity of the sector and students, a narrow set of metrics in three categories as proposed in the Green Paper (employment/destinations, retention/continuation, and student satisfaction) may not be sufficient for students to make informed and individualised choices. Furthermore, particular consideration would need to be given to students’ backgrounds. The Green Paper acknowledges that graduate outcomes differ by disadvantaged groups and any focus on this as a metric in the TEF without consideration of these backgrounds would lead to a framework that does not truly measure learning gain and is therefore misleading.

The point above highlights the fact that there is a tension between the desire to provide straightforward information and the fact that the underlying data are complex. In order for any information from the TEF to be able to inform decision making, it needs to be simple, comparable, robust and reliable, but also provided within an appropriate contextual framework. Raw metrics without any sense of benchmarks or context are unhelpful, too narrow in scope and could unintentionally promote flawed decision making.

It is somewhat unclear to what extent employers would use the TEF to make decisions given they would normally make decisions on the basis of skills and experience of candidates. In this context, it should be noted that QMUL is already in the process of planning for the introduction of a GPA scheme to run in parallel with the Honours Degree Classification and we do expect this to have a positive effect on student engagement and the additional granularity in the scale to help employers to make better informed decisions. QMUL is also developing its plans to expand its portfolio of degree apprenticeships, and this will help involve employers and those recruiting in the relevant sectors to employ graduates with the necessary skills and academic knowledge to succeed.

**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.

We agree that the ambition for TEF should be that it is open to all providers in order to provide a level playing field.

On balance, we agree that the benefits of undertaking the TEF phase two at discipline level outweigh those at the institutional level but there would be considerable concerns regarding the associated costs and therefore, for example, institute-wide services related to teaching-quality would need to be covered in common.

Benefits of assessment at discipline level (appropriately defined by the sector) include:

- Less aggregation and therefore greater accuracy.
- More expert input and therefore greater credibility.
- More informative for students.

We note, however, the substantially increased risk of creation of a burdensome system as granularity of assessment is increased – an outcome that the Green Paper specifically seeks to avoid.

**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?**

We agree that an approved access agreement should be a pre-requisite for a TEF award, with a similar mechanism, perhaps utilising similar targets to those set out in Access Agreements, for other providers. This would ensure a level playing field across all provider types.

The link between the TEF and widening participation is welcomed as it highlights the importance of ensuring the success of students from a wide range of backgrounds. However, the detail of the metrics to be used will be crucial. There is a risk that some employment and retention metrics in the TEF will work against HEIs that already attract a high proportion of students from less privileged backgrounds. There are many reasons for poor retention, but factors relating to financial problems and family difficulties are prominent amongst these. Employment and internships in the professions are greatly enhanced by family or other networking connections, and these connections are less likely in students from widening participation cohorts. While there is reference (p31) to ‘breaking down’ the metrics to take into account background, greater detail is needed as to how widening participation metrics will be linked to TEF outcomes, and how they will affect the opportunity to move beyond TEF level 1.

**Question 5: Do you agree with the proposals on:**

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

- Yes       No       Not sure

This seems to be a sensible approach as this relies on an existing published mechanism and thus minimises bureaucracy. Quality assessment and teaching excellence must not be developed as separate assurance systems.

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

Yes       No       Not sure

Yes we agree there should be a mirrored approach for alternative providers to ensure that there is a level playing field across the sector.

**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 very unlikely that an adequately sophisticated framework, in which the sector has full confidence, could be introduced on the intended timescale, i.e. by year two.

Furthermore, while we support the exposure of poor teaching quality and the notion that there should be sanction over this, the proposed link between fees and differentiated levels of TEF, where it would be very difficult to categorise institutions accurately against these levels, is likely to prove problematic.

There is also a significant risk that the reputation of the UK higher education sector could be damaged by differentiated levels of TEF, particularly if this is because of inappropriate use of proxies for teaching quality.

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

**Timing?**

Yes       No       Not sure

TEF assessments need to be minimally burdensome hence determining the frequency of reassessment on a risk basis, with the proposed application window, may be sensible, e.g. institutions causing concerns or those seeking a higher level of award should be reassessed.

In relation to this issue it should be noted that teaching quality can be influenced and can change much more rapidly than for research outputs and this could present issues with a periodic snapshot of teaching quality.

**Assessment panels?**

Yes       No       Not sure

Confidence in the expertise and integrity of the assessment panels would be essential. There would need to be careful consideration of how widening participation aspects of the assessments would be integrated with assessment of teaching quality. The TEF should make use of professional-body accreditations as part of the assessment to avoid duplication. It is, however, unclear how employer representatives would be chosen given the diversity of

graduate destinations and also whether such representatives would be able to judge teaching quality.

**and process?**

Yes       No       Not sure

Please give reasons for your answer.

The main focus of the TEF should be learning gain. The proposals on assessments relating to teaching quality and learning environment need to underpin this primary ambition but the process needs to be designed to minimise the administrative burden and the possibility of 'game-playing'.

We note that there is the potential for multiple panels, publication of panel decisions, moderation and an appeals process, all of which add to the bureaucracy of what is aiming to be a low bureaucracy process.

**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.**

We are mindful of the potential administrative burdens of the TEF, particularly in the context of the direct and indirect costs incurred during preparations for the most recent REF submission. Our estimates (which can be provided if required) indicate that QMUL incurred multi-million pound costs, related to internal staff time and the use of external assessors, over the four-year period running up to the submission deadline. These data would suggest that the TEF would have to be designed in a way that was substantially less burdensome than its research equivalent to avoid imposing major direct and indirect costs on institutions.

Use of metrics could reduce the administrative burden on institutions, however in order for the TEF to be effective the metrics need to be carefully designed to capture learning gain appropriately.

**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.

We are concerned about differentiation in TEF awards based on performance 'significantly above expectations'. There is insufficient detail to describe these expectations. For any differentiation to be meaningful, the metrics would need to appropriately reflect the items they are intended to measure along with relevant contextual and benchmarking data. In the absence of credible, contextualised data, the approach could unintentionally mislead potential users of TEF information and lead to inappropriate comparisons being made. The more detailed technical consultation on the exact proposed metrics is important in this regard.



If enacted, we would anticipate issues with the boundaries between different levels of TEF outcome. There is also a risk of publically stating that the education provided by some institutions was not as good as others, which might undermine confidence in UK HE amongst international students.

We question whether there needs to be a link between fees and the TEF levels; reputational incentives might be sufficient, and helpfully keep the focus on teaching excellence.

**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.

Although we agree that there should be a consistent approach for providers across the sector, we are not supportive of different levels of TEF awards linked to differentiated fee caps, which risks over-complicating the fee landscape for students.

If fee uplifts are to be restricted to allowances for inflation, there is a risk that some providers might choose not to participate given the costs (both real and opportunity) of submitting to the TEF set against these limited incentives.

**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.

We broadly welcome the proposed focus of the TEF on teaching quality, learning environment, student outcomes and learning gain. We also welcome the proposal that institutional evidence on fair access be part of the additional information provided to supplement the common metrics. However, as previously outlined, there are many factors beyond the teaching and learning environment which drive student outcomes and these therefore need to be taken into account any measurements.

HEFCE's research on differential outcomes<sup>1</sup> provides additional support to the notion that DLHE data could unintentionally penalise institutions who are more fully embracing the government's widening participation agenda. We would therefore wish to see the metrics not simply broken down and reported by disadvantaged/under-represented groups, but benchmarked and adjusted on this basis so that headline figures, which are potentially misleading, are not given undue influence. The use of HMRC data looking at employment and earnings more than 3 years after graduation may be a better measure, however this may prove difficult to benchmark outcomes of underrepresented groups in early years.

We welcome the Green Paper's suggested focus on "the relationship and mutual benefits between teaching, scholarship and research" as we believe that this is a key factor in enabling us to provide students with a well-rounded educational experience and to support lifelong learning beyond more straightforward learning metrics. Also, an institution's ability to provide

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<sup>1</sup> HEFCE (2015), 'Differences in employment outcomes: Equality and diversity characteristics', October 2015/23

graduates with the skills and knowledge required to progress to further study should be considered.

While we are strongly of the view that learning gain is the most important factor, there is a need for research into different approaches to measuring learning gain within the sector as current measures are crude and lack credibility. Research and piloting of learning-gain measures (that can accommodate the different approaches to learning gain taken by different institutions) should be carried out alongside the development of the methodology of the second phase of the TEF, which would have a bearing on the timescale for implementation of the second phase.

**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.

Given our belief that vision, context and even location play an important part in overall performance and in the provision of a holistic educational experience, we strongly believe that there should be scope for institutions to provide additional supporting evidence and narrative to be considered by the panels alongside any national metrics.

We are not convinced that the currently proposed metrics are suitable proxies for the areas of focus, and they do not provide comparability due to the significant differences in outcomes between different groups of students. In addition, if the intention is to open the TEF to all disciplines, modes and levels of study, the common metrics are unlikely to provide sufficiently robust data sources to support that granularity; some of those metrics are only collected for undergraduate students.

As outlined above, we think that the metrics should be broken down by student background. We would welcome a strong focus on performance on improving access and success for students from disadvantaged and under-represented groups.

DLHE data that are collected six months after graduation are of limited value regarding the longer-term outcomes for students. The proposed future use of HMRC data matching would help with consideration of longer-term outcomes and would help to inform prospective students. However, these data alone would not capture information on students undertaking further study.

Use of graduate salary data in the TEF implies a direct link between higher salaries with better educational outcomes, which would be a significant over simplification.

We note that the current metrics on retention and continuation do not provide any context as to why a student chooses to discontinue, and that in some cases this may be a positive choice.

Student satisfaction is not a genuine performance measure of teaching quality; it is opinion-based information that can be influenced in any number of ways. There is risk that those completing NSS Surveys are influenced by the perceived reputational effect on their institution of the survey outcomes, rather than providing an accurate assessment of quality of teaching.

## 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.

QMUL has a proud record of providing a university education of the highest quality to a diverse population of students, including many from backgrounds lacking financial or social privileges, and indeed our Strategy identifies how we can further extend this work. To this end, while recognising that widening access is not directly related to teaching excellence, we welcome those aspects of the Green Paper that have the potential to improve access and success for students from disadvantaged and BME backgrounds. We particularly welcome the recognition to be given to those institutions that do the most to support students from a range of backgrounds. However, the expectations on the sector as a whole and for individual institutions must be clearly identified.

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.

We do not agree with this proposal as allowing the Office for Students to set targets for providers would be resource intensive and would threaten institutional autonomy and undermine an institution's capacity to set their own targets based on where most improvement is required. Furthermore, externally set targets would be less likely to recognise collaborative work and work with younger school-aged students, which constitutes valuable outreach activity but arguably has less direct impact on an individual institutional outcomes. We note that the Office for Fair Access does not support this approach and that the current system works well, and targets agreed through discussion and negotiation are better able to reflect the institutional context.

Should there be a power to set targets, baseline levels of performance should be taken into account, so that institutions who are already succeeding in this area in real terms are not held disproportionately to account with respect to targets compared to institutions with much lower levels of overall performance.

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

Part-time students and those studying short courses (i.e. non-degree programmes) to encourage a return to study and, for example, to improve the educational ambition within deprived households should be considered. Access to postgraduate study can prove to be challenging for prospective students. There could also be greater consideration of measures to support disabled students. Given collaborative working and partnerships between HEIs

has been encouraged and funded in the past, some consideration of these arrangements would be welcomed.

**Question 13:**

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

We support the proposals to work with bodies across the sector to provide relevant data and information and it would be helpful if data were more accessible to institutions on a timely basis.

The development of a more consistent approach to data and monitoring from primary school (implementing a unique learner reference number) would help inform the debate on definitions of disadvantage and under-representation and determine robust and workable performance indicators against which progress and success could be measured reliably. Access to the National Pupil Database (NPD) and UCAS data at individualised level would facilitate research into which interventions have the greatest impact. It would also allow comparison with outcomes for non-participants from similar backgrounds and prior attainment levels. At present UCAS will not provide individualised data, and the work required to access partial NPD data is complex, time-consuming and costly.

HEFCE has played an important role in widening participation research, data analysis and evaluation, and it is important that this support is not lost if HEFCE's role is integrated into the new Office for Students.

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

Improved access to appropriate data could in the longer term bring greater efficiency. We anticipate that there would be development costs associated with any new arrangements but hope that the already considerable data-collection burden on HEIs would be kept to a minimum. If data could be gathered from existing sources such as the HESA student return and Access Agreements, the administrative burdens could reasonably be contained to review and analysis. In relation to name-blind applications, we would envisage a substantial allocation of staff time to be required to ensure that we can adequately track students whom we engage with through our widening participation work and therefore assess the effectiveness of our activities. This is likely to impact significantly on QMUL, given our long-standing and successful commitment to widening participation.

We are engaging with the UCAS consultation on this issue and would urge the Government to carefully consider the outcomes of this process, in terms of the potential administrative implications for universities.

**c) 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.

We agree that a level playing field should be created so that the system is fair and equitable for all providers. The process should remain rigorous and thorough to retain credibility and reputation nationally and internationally. Furthermore, the application of rigorous criteria governing entry to the sector reduces the likelihood of subsequent institutional failure, with the hugely negative impact on students (both present and past – meaning holders of an institution’s degree) that result from failure.

Given concerns around the quality of private provision, a robust review of proven, high quality track record of providers is a necessary element of any decision and we do not believe this should be reduced. We do not believe that the track record of individuals should be taken into account as this does not appropriately reflect the current operating environment. Universities should not be reliant on the track record of individuals for their success, this needs far greater embedding across the whole institution.

We also disagree with the proposal that the University title should not be limited by the size or location of the student body. This risks creating a complex, unstable sector which is difficult to manage and operate, and risks undermining the UK’s reputation for maintaining high quality higher education.

**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.

We agree with the need for a phased, risk-based approach which would help to safeguard the quality of higher education.

It is not sufficient for safeguarding standards to rely on sanctions after the event; there must be confidence that new providers can meet and maintain the high standards as a condition of their eligibility

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

We would urge caution regarding giving DAPs to non-teaching bodies in order to “widen options for validation”. Non-teaching bodies do not in general have a substantial academic community to maintain standards and such an option risks lowering of degree standards.

**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.

Speed of entry to the sector should not be at the expense of evidence-based decision-making. It is not in the interests of students for unsustainable new institutions to enter the sector only to fail. The proposed reduction from three years to two years of financial track record would perhaps be particularly unwise in this respect.

## 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.

Contingency plans should ensure that commitments made to students are honoured, e.g. regarding financial support. We would not support a central 'insurance' type arrangement which could lead to strong institutions subsidising those in the sector who are more likely to fail, rather we would support the development of local arrangements appropriate to each individual provider.

## 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 separation of teaching funding from research funding proposed in the Green Paper (and reinforced by the Nurse Review) is a concern, as is the lack of clarity on where funding for the variety of knowledge dissemination activities (beyond teaching) would sit. 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 there will not be one body that takes a holistic view of the health of an individual provider/institution.

**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 OfS should be able to contract out the delivery of quality assurance and the collection of data, if this meets quality and cost requirements. Indeed there are clear positive advantages to separation of these functions from regulatory activities.

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

**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,

We think that it would be inappropriate for BIS to determine and administer the formula. The principle of institutional autonomy is more likely to be maintained by Option 2, which also reduces the risk of political influence over funding decisions.

We note, however, that under the arrangements in Option 2, the OfS would be a funder as well as a regulator, which is a position that would require careful consideration. Perhaps the oversight of an independent board could help to avoid conflicts of interest.

**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.

We broadly welcome the proposals to put in place a single, transparent and light touch regulatory framework for all 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.

We 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?**

Students' unions play a vital role in supporting students and in representing their views but we doubt that any further steps taken by the Government would aid transparency or strengthen accountability.

**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 Office for Students to have a statutory duty 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.

There are advantages to widening participation being integrated into the Office for Students, as this could be seen to enhance the status of this work. However, the Director of Fair Access to Higher Education should remain a specific high-profile post within the Office for Students, and should be free to operate independently of other regulatory duties and conflicts of interest. The proposed duties and powers relating to widening participation should continue to reside with the Director, and this position should be enshrined in legislation.

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

Yes       No       Not sure

Please give reasons for your answer.

The subscription payment together with the costs of implementing the TEF are very likely to outweigh any TEF-related increases in tuition fee income to institutions. Furthermore, the proposal raises the potential for conflicts of interest between its proposed funders (providers) and its proposed 'customers' (students).

If the subscription model is introduced, institutions would need to be able to ensure that they were receiving value for money; this could be achieved, for example, through an independent board.

Any subscription model which would include costs for the support of failed providers would not be supported.

**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.

Setting tuition fee caps (except inflationary increases) should be the business of Parliament, rather than the Secretary of State. We would, however, 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?**

Without details of how such powers of managing risk would operate, it is difficult to comment.

**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.

We would broadly welcome these proposals as steps to lessen the time and cost impacts on the sector.

**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?**

Awarding research funding according to the Haldane Principle and on the basis of excellence is the most effective way to secure the maximum economic and wider benefits. The dual support system of funding research in universities is of critical importance in sustaining the international excellence of UK research and so it will be essential to establish safeguards to ensure the distinction between the two streams is not eroded, and that the distribution of funds between the two is broadly maintained.

It will be vital to ensure that the Director of Research UK is independent, and able to work well with the Research Councils as well as talk to government effectively. The separation of research into RUK and teaching into the Office for Students creates what could be an unhelpful divide amongst the national bodies dealing with universities and could reduce effective oversight. It also creates a false dichotomy between the institutional research landscape and that for teaching and students. This is not helpful as these functions interrelate in Higher Education institutions and cannot be viewed as entirely separate parts of the landscape.

**Question 25:**

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

We would wish to see the independence of the dual funding streams explicitly guaranteed in the legislation setting up Research UK or other organisation.

**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

Without this there would be an inevitable pressure to link QR funding to Research Council funding in some way, or to make funding transfers. Separation of these funding streams would also be necessary because of the complexities in these funding streams between England and the devolved administrations.

**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 benefits to QMUL are we believe also common in the research-intensive sector – the availability of peer-reviewed assessments at a UoA level of our research has been a very useful additional source of information to guide decision-making, and also to make comparisons across the sector. The REF has also been effective in increasing the quality of research overall. The introduction of impact in the 2014 REF provided a helpful impetus to ambitions to foster initiatives in this area. These benefits can be preserved by maintaining the current REF structure in general terms.

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

The simplest mechanism to reduce the burden of the REF is to reduce its frequency; the next REF should not take place until 2021 at the earliest, and ideally later. We would also recommend that Panels be allowed to specify a greater use of metrics (albeit moderated by peer review), as they deem appropriate.

In addition, the impact template should be incorporated into the environment template. The use of metrics in the environment template should be increased, and a more standardised and quantitative topic-based template should be used to cover different areas.

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

RUK could usefully provide a unified system for reporting on research information; the Gateway to Research appears a helpful step in this direction. Linkage with other funders of research could be explored. The current outcome reporting tool ResearchFish is not well-designed and is labour intensive, affecting its use.

Any new system of collection of research information should take account of the welcome moves to rationalisation of the HE data landscape being led by the Higher Education Statistics Agency.

**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.

N/A

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**