



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
	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)

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?

AGCAS welcomes the aspiration to “give students much more information both about the type of teaching they can expect and their likely career paths after

graduation". We also welcome the proposals for equality of access to "***widen participation of people from disadvantaged backgrounds***" in HE.

However, there is no reference to a critical part of successful transition into HE (and subsequent retention and graduate destinations/outcomes) and that is the need for pre-HE careers information and guidance (IAG). Successive governments have merely paid lip service to this issue and have consistently failed to value and invest in the (re)introduction of an appropriately funded, impartial, professional and qualified careers IAG service for schools.

Careers IAG has a crucial role to play if potential students are to respond to the "***evidence of a surplus and mismatch***" in skills and staffing [reported by UKCES surveys](#) and feel able to convert the growing wealth of data and information into personalised intelligence, sound decision-making and effective action. The culture of league tables, with limited guidance available on how to interpret them, means that, in the absence of pre-HE careers IAG, choices are too often made on the basis of league positions (which are often actually meaningless).

Provision of pre-HE careers IAG is especially important in the case of the most disadvantaged students (seeking to progress to further study or highly skilled/graduate-level jobs).

It has been suggested that there is no evidence that higher fees are deterring students (from WP backgrounds) from entering HE. Furthermore, there appears to be no concern from BIS that higher fees will deter future students. However, the reality is that many students will only start to feel the burden of higher fees once they have entered the graduate labour market and are earning enough to start repaying their fees. This is especially pertinent in the context of social mobility – the impact will be greater for those individuals from lower to middle income families. The AGCAS view is that a responsible and mindful approach to fees for WP students, with consideration of background and social capital, is imperative. It is ironic that funds specifically available to support WP students are being reduced or removed at a time when HEIs are trying to increase access, for example the Disabled Student Allowance and the Student Opportunity Fund.

AGCAS welcomes any recommendations that will help make selection to HE fairer. While the proposals for 'name blind' UCAS applications are well-intended, if HE admissions teams are only judging applications on the basis of grades and the experiences/opportunities students have taken up (and included on their personal statements) they will be judging in isolation rather than being able to measure the distance travelled of a student who has achieved despite the odds against them.

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

☒ Yes

☐ No

☐ Not sure

Please provide any further relevant evidence.

In tandem with the introduction of 'name blind' UCAS applications, AGCAS would support further measures to counter an arguably even greater perpetuator of social immobility within the graduate recruitment process itself – institutional preference. If the intention is to carry social mobility through to graduate destinations, the

introduction by employers of 'institutional blind' processes should also be encouraged.

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.

Improving the quality of information to aid student choice, the provision of high-quality, specialist careers IAG, providing "*greater focus on graduate employability*", supporting the needs of the UK and global market and the increased focus on employer engagement with HEIs to determine the nature of their provision (which is already taking place across the UK due to the not insignificant efforts of individual HEIs and employers) are all welcome proposals.

The subsequent detail on how this affects the work and role of HE careers services is less clear. It is important not to conflate 'graduate employability' with short-term 'employment'. HE careers services have a pivotal role in supporting students, institutions and employers to meet this challenge to ensure that the messages of employability and high-level skills, which are more akin to attitudes, attributes and the capacity for reinvention and life-long learning, are not lost amongst a focus on immediate hard-skill need and short-term employment outcomes.

It is the AGCAS view that there are also some major assumptions made in the paper relating to graduate employability and employer engagement that warrant challenge.

These include:

- The statement that significant numbers of graduates are entering non-graduate jobs has a poor evidence base. The Longitudinal DLHE survey does not produce sufficient data to evidence this statement. The most recent six-month DLHE results indicate that the majority of graduates are entering graduate-level jobs.
- The statement that employers are concerned about skills shortages/mismatch and job readiness is very open-ended. Which employers and in which sectors? This sentiment is regularly communicated by/on behalf of 'graduate employers' but is usually based on a very small, albeit valid, body of opinion within graduate recruitment (essentially, large multinational corporate) and is not necessarily the case across all types of employers and sectors.
- It is vital to retain sight of the need for and impact of active student engagement in the co-production of HE outcomes. Employers, whether major graduate recruiters or local SMEs, will not be in a position to engage with the detail of the skills and knowledge available from the diversity of institutions and courses which provide the richness of UK HE. The capacity of students and graduates to engage with, own and articulate their unique skills and competencies will remain. The TEF, and any communication around this, should make this clear rather than suggest and assume that employers will have this knowledge and understanding.
- The assumption that employers currently don't play a major part in programme design fails to take into account the hundreds of examples where employers

play a very active role in co-designing, advising and supporting the curriculum – as well as their involvement in extra-curricular activities.

- AGCAS would challenge the assumption that employers, of any size or type, will value or make use of a Grade Point Average (GPA) system. Most employers have their own approaches to graduate recruitment (national or very local), designed to meet their very specific recruitment requirements. A major focus on GPA scores also flies contrary to the move of many major employers away from using degree classification to sift out applicants; they have realised that this approach is against their increasing focus on equal access. Furthermore, the introduction of GPA does not address the underlying challenge of comparing results and marks across institutions.
- The paper has a clear and purposeful drive to ensure fairness and equality, which AGCAS supports. However, the introduction of the TEF, which cannot be a measure of a students' suitability and preparedness for employment in its own right, surely reinforces institutional bias (present in graduate recruitment practice, as outlined in Question 1b). It allows for a continuation of institutional comparison and makes no provision for 'blind' graduate recruitment. To have real meaning, the TEF should include robust measures of student contribution to their own learning.
- The simplistic focus on graduate destinations and salary data is a flawed approach to 'assuring' the quality or worth of a degree programme. AGCAS agrees that that *"higher education should deliver lasting value to graduate"* and we welcome debate and agreement on the diversity of indicators of value. AGCAS feels that there could be greater recognition that graduates who are in jobs that 'make them happy' are also considered good outcomes. We remain wary of disregarding the wider social values of HE and equating value in simple earnings/income terms. Taking such an approach ignores many realities including:
 1. Many degrees require graduates to undertake additional work experience or skill development prior to obtaining more positive graduate destinations. This has always been the case, especially for non-vocational and/or arts and humanities subjects. This does not mean that these degrees lack value or impact and taking this approach comes dangerously close to stating that its only worth studying English, Philosophy, History or Theology if you can get £X salary within X months. Those outcomes, while important, are not the reason why students study these subjects.
 2. If graduate salary data is going to be that important then we would recommend that the government also looks at legislating against abusive employers who repeatedly pay the absolute minimum salary if they can get away with it (including MPs, who still offer 'unpaid' internships to graduates who must follow these routes to break into many public sector careers).

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.

Yes. If the purpose of the TEF is to genuinely inform choice and decision-making, all options should be included with the expectation that all providers will offer the same level of service and support.

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?

AGCAS would support the Access Agreement route in the absence of anything more effective.

Question 5: Do you agree with the proposals on:

a) what would constitute a 'successful' QA review

☐ Yes ☐ No ☒ Not sure

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

☒ Yes ☐ No ☐ Not sure

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

☐ Yes ☐ No ☒ Not sure

Please give reasons for your answer.

It's unlikely that universities will/can shift their positions without such incentives.

It is difficult to agree or disagree without consideration of what the metrics will be and appropriateness/ability to deliver objectives, particularly in light of the reviews of QAA and DLHE processes, which are in progress. In principle, AGCAS would welcome the inclusion of something that relates to student engagement and consideration of learning gain or distance travelled.

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

Timing?

☐ Yes ☐ No ☒ Not sure

Assessment panels?

☐ Yes ☐ No ☒ Not sure

and process?

☐ Yes ☐ No ☒ Not sure

Please give reasons for your answer.

In relation to Chapter 2, Para 6: “*One consequence of this approach is that some assessments might be more recent than others for students choosing a course.*”

This would be particularly challenging if using short-term DLHE data, which can be significantly influenced by economic conditions, resulting in potential students making erroneous conclusions about the quality and achievements of different institutions.

In relation to Chapter 2, Para 9: “*The proposed panels will be made up of a balance of ... and employer/professional representatives.*” AGCAS would welcome the inclusion of processes to ensure this is representative (region, sector) and able to be delivered in the scale required and with appropriate moderation across panels.

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.

Lack of detail makes it difficult to comment on administrative burdens and cost other than to assume these will not be inconsiderable if the process is to be meaningful, fair and robust.

In relation to Chapter 1, Para 12: “*... at present students and employers must rely on imperfect proxies rather than a robust assessment of teaching quality.*” The proposed introduction of a TEF raises the question: what is a robust assessment of teaching quality? The metrics mentioned to date represent similar imperfect proxies. Identifying relevant robust and suitably granular measures, without introducing significant levels of administrative burden and cost to institutions, must be at the heart of any TEF.

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 per Question 5.

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.

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.

As per Question 2.

AGCAS welcomes the move away from reliance on DLHE data six months after graduation, favouring a longitudinal approach as part of proposals to take a broader perspective (although this approach will inevitably bring response rate issues).

However, the AGCAS view is that using HMRC salary data as a measure of career success would give a skewed value of the interpretation of a graduate-level role.

HMRC data:

- **will only provide salary details – it will not capture the multitude of other outcomes which could constitute career success and/or make a degree worthwhile;**
- **will not factor in regional discrepancies and variations, part time versus full time, career motivation, etc;**
- **will not include job titles – determining whether a role is ‘graduate-level’ or not will not be possible;**
- **in the absence of SOC codes, will not offer data on whether a job is related to degree studied (if HMRC data can be used to collect salary information, is it not possible to also collect data on job title and employer to enable coding of roles?).**

If salary data is to be utilised in any way, it is imperative that such data is contextualised so as to give a balanced picture of regional differentiation and variations in subject of study and institutional student demographic.

Teaching excellence linked to the learning environment, outcomes (in terms of employment) and the interpretation by students of their experience goes some way towards demonstrating evidence of quality. However, student and staff retention rates, academic achievement and recruiting excellent teaching staff with the right induction, training and support for continued professional development should all have the same focus.

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.

Not in the case of DLHE or salaries – for reasons already given.

Contextual information is vital, for example the mobility of students from WP backgrounds has a direct impact on their employment outcomes just as local economic context has a direct impact on student destinations. Ensuring such information is available and has the same impact on reputation, rankings and decision making as quantifiable data from national datasets is crucial.

Employability covers a range of factors and activity (skills, attitudes and behaviours) and to focus on limited metrics is too narrow an approach. More useful measures for inclusion in the TEF could be the provision by institutions of access to extra and co-curricular development opportunities for students such as work placements, volunteering, internships and employer engagement events.

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.

AGCAS fully supports the desire to make HE more accessible.

- 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.

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

Question 13:

- a) What potential benefits for decision and policy making in relation to improving access might arise from additional data being available?
- b) What additional administrative burdens might this place on organisations? If additional costs are expected to be associated with this, please quantify them.

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.

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.

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

Although not opposed to the idea of private providers being able to award degrees, the move to fast-tracking degree awarding powers and allowing any providers to call themselves universities has the potential to add confusion when making choices (not 'a like for like' comparison).

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.

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.

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.

- 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?

In agreeing we realise that this may result in returning to the current situation, ie having HEFCE, QAA, etc.

- 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,

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.

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

Student Unions are not the same as mainstream Trade Unions. This approach takes an ultra-simplistic approach to the very complex and positive relationships that Student Unions have with their institutions and the value they provide to their members (who are students, not workers).

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.

AGCAS is against the idea that so many independent and impartial bodies would be shoehorned into one overarching agency. This is entirely at odds with the issues of transparency and accountability that are repeated throughout the paper.

In relation to Chapter 2, Para 2: “*The purpose of OfS will be to empower, protect and represent the interests of students, employers and taxpayers*”. The AGCAS view is that the office should therefore be renamed to reflect all stakeholders. The exchange of data and the management of student data needs to be ensured, just as Freedom of Information requirements should apply to all providers.

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

☐ Yes ☐ No ☒ Not sure

Please give reasons for your answer.

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.

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

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.

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?

Question 25:

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

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?

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

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

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