



Department for Business, Innovation & Skills

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

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

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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
X	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?

The ongoing development of the TEF and proposed changes to regulatory architecture will require great care to avoid perverse incentives in equality terms. For example, using retention metrics as part of the TEF risks penalising institutions with above average levels of students who have been in care or who have other less advantaged backgrounds, unless there is an extremely subtle and agile weighting for each cohort. Looking

further ahead the use of metrics including graduate destinations, future earnings, at some stage the RAB charge itself at more and more granular levels of detail, may drive institutions away from certain disciplines or student groups without regard to the wider social equality agenda.

The proposed changes to architecture seem to risk narrowing perspectives on equality. For example, there is substantial evidence that where students live has an impact on educational attainment independent of household income, and it is not clear how the OfS and market forces could replace HEFCE's historic role in addressing HE regional cold spots.

Using student evaluations as part of the metrics in the TEF, particularly if the TEF outcomes are linked to fee levels, risks amplifying the well-known biases in such evaluations. This raises particular concern about gender bias in institutional evaluation of the effectiveness of lecturers in TEF metrics. A useful recent summary may be found in the research by Boring, Ottoboni and Stark (2016):

<https://www.scienceopen.com/document/vid/818d8ec0-5908-47d8-86b4-5dc38f04b23e>

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

☒ Yes

☐ No

☐ Not sure

Please provide any further relevant evidence.

The underlying assumption that informs the TEF is that one of the main barriers to equality of access to higher education from different groups is lack of information about teaching excellence rather than lack of high-quality advice and guidance in interpreting the complex web of available information. This is at best a contestable and testable view, at worst simply in error. For potential applicants the TEF data sets will be added to a large volume of existing information, and this may simply add to the complexity of the task of navigating the league tables, NSS, KIS, DLHE, and so on. Additional complexity of provision of information may indeed further advantage applicants in a better position to access informed advice from family members or expert school advisers. For many reasons (which are discussed later) the idea of distilling the complexity of the student experience and the complex interaction between student, university, and course into a simple set of grades denoting excellence could offer little support to applicants assessing the available evidence.

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.

To do this the TEF needs to capture complex ideas and avoid naive metrics (for example: Does higher contact time correlate with higher on-task engagement? What metric information helps an applicant navigate from 'this

course is excellent' to 'this course is excellent for me'? Do high subjective student satisfaction scores correlate with high levels of learning outcome?). Above all, applicants need to assess whether the course or institutional offering will work for them as individuals and support them on their own journey, which is difficult to capture in metric terms and really requires closer engagement, visits, attendance at presentations, guidance from their teachers. (The HEPI response to the Green Paper proposals in their Report 81 provides additional evidence on these concerns)

Employer engagement will operate differently in vocational and non-vocational programmes, and must be viewed alongside actual employer behaviour as reflected in DLHE data.

At Durham we see the educational experience (of which 'Teaching' is itself one small part) as one component in a rich and complex experience of development opportunities for the whole person which is important for future employability and for many other things: a future role as an informed and responsible global citizen, an adaptable and life-long approach to continued learning and development. Our expectation is that employers of our graduates will take heed of the TEF results, but only as part of a much wider picture.

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.

In principle the answer has to be yes, but the first priority should be to establish in an evidenced fashion how to make the TEF meaningful, avoid perverse incentives, and ensure it does not discourage desirable wider experiences outside the lecture theatre before expanding its reach. If the TEF can be configured to provide useful information to all categories of applicant, then the long term ambition should be to extend it to all modes of delivery and all providers.

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?

Yes it should, as long as the same territory is not then also assessed in the TEF itself. There is a risk of duplication of effort unless this is handled astutely. This question also cannot be addressed in isolation: the Access Agreement is an annual cycle of interaction with the existing body OFFA, and if changes are made to how OFFA operates then this becomes a quite different question.

Question 5: Do you agree with the proposals on:

- what would constitute a 'successful' QA review

☒ Yes ☐ No ☐ Not sure

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

☒ Yes ☐ No ☐ Not sure

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

☐ Yes ☒ No ☐ Not sure

Please give reasons for your answer.

As with OFFA above, it would be strange not to take advantage of the existing QAA review data to start the process. It is important to note however that the QAA model, which is highly regarded internationally, is essentially about thresholds for degree awarding powers above which institutions can articulate their distinct offerings.

The move to differentiated TEF levels from year two depends on the linkage to fees. The higher levels of TEF could be a useful process for applicants and institutions if their purpose is to recognise and encourage diverse excellence in teaching and help inform student choice. The link to fees risks distorting behaviour, pushing institutions away from a richly diverse student experience beyond the lecture theatre, and stifling diversification of the market.

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.

Timing will be difficult because of the long lead time for information to applicants (a typical prospectus for entry in 2017 will have been signed off in November of 2015) but this may be manageable. The proposals for panels seem perfectly sensible but may prove to be extremely difficult to populate

because of the link to fee levels. Linking TEF grades to fee levels means the judgements will have potentially significant consequences and may require a large number of well-trained and expert panels to be convened more or less simultaneously, which will need to have real credibility in the sector. The TQA experience – with similar motivations – struggled to build enough credible panels sufficiently rapidly, and in hindsight damaged educational quality by driving all departments into a specific model of delivery. The weight of linking TEF outcomes to fee levels, even on an initially modest scale, risks placing too much of a burden on the proposed 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.

Primarily by using existing public metrics and information provided through prospectuses, KIS, and so on. Minimising the administrative burden is however in tension with effectively assessing the complex diversity of provision, and (because of the link to fees) it is inevitable that HEIs will invest considerable resource in TEF submissions and the assessment process will be costly. Reducing – even controlling – the administrative burden on institutions requires the link to fee levels to be revisited. A particular concern is that the pressure to control costs by using existing metrics may bring measures like the so-called “good honours” rate into play, exerting strong pressure to lower standards. A model in which the TEF establishes in a definitive and metric or yes/no fashion an ambitious threshold level (does this institution / course meet the levels of provision to retain degree awarding powers? Does it meet appropriate levels to retain highly trusted sponsor status for international students?) and on top of that makes some assessment of what is distinctively excellent in a narrative and non-metric fashion could be light in burden, useful to applicants, and robust. It is the linkage between higher TEF level outcomes and fees that make it almost inevitable that it will become burdensome to administer and damaging in its impact.

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.

Differentiation and recognising excellence in teaching is to be welcomed, but linking those awards to fees rather than supporting a genuine market to emerge, in which fee levels are largely determined by a normal provider – purchaser negotiation, is problematic. There is a clear national interest in ensuring the maintenance and continuing evolution of the threshold required to retain or to merit degree-awarding powers, but the articulation of the diverse ways in which institutions may wish to assert what is distinctive and excellent about their offerings is a matter for well-informed applicants to decide based on transparent information. By attempting to capture

excellence of provision in a single metric shaped by the regulator we risk undermining the clarity of the critical threshold judgements and diminishing the diversity of provision.

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.

The emphasis on teaching quality rather than the educational experience as a whole is predicated on a particularly narrow view of higher education. Teaching is simply one small piece of a rich and complex experience and all of the components are important – learning and personal development above all. Measures of the learning environment and actual student outcomes get closer to the things that matter, but are fraught with difficulty. In particular, if learning gain measures create any incentive to lower standards by awarding more good honours outcomes they will be counter-productive. Learning gain measures also risk driving HEIs to reduce a rich educational offering building confidence, teamwork, and behavioural skills down to a focus on a narrow set of measures. We would welcome a shift in emphasis towards: actual outcomes, ideally beyond the immediate and involving employability and other indicators some years after graduation; experiences beyond the lecture theatre that build confidence; assessment of how the student develops as a citizen; contributions students make to wider society while studying.

(<http://edr.sagepub.com/content/early/2015/11/10/0013189X15618385.full.pdf+html>)

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.

The process must avoid duplication of effort and build on the existing data sets. However, it should separate thresholds (which can be established from

existing data sets and QAA audit reports) from institution-specific differentiated offerings articulating bespoke notions of “excellence”, which should be primarily about transparent information aimed at the intended applicant rather than a regulatory process linked to fee levels.

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

Question 12:

- 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.

Clearly a desirable national objective – it is less clear that the focus for achieving this should be entirely at institutional level. A concern is that the expertise and relationships that OFFA has built up in the sector need to be sustained and not undermined.

- 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.

The historic strength of higher education in the UK is in part a product of institutional autonomy, and this would risk directly undermining that. It would also drive perverse behaviour away, for example, from some excellent work aimed at raising aspirations and increasing access to HE in general and reduce institutional effort entirely down to entry to that specific HEI, which may not serve the individual applicant or the wider project well. It is not clear on what basis the Office for Students would make such judgements, and not clear where responsibility might then lie for resulting student outcomes.

- What other groups or measures should the Government consider?

Students who have been in care; more generally the aspiration should not be towards specific groups defined now but towards ongoing evidence-driven focus on specific groups.

Question 13:

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

More refined information will help in several ways, permitting targeting of effort where it will do most and equipping the regulator to come to an understanding of whether it makes sense to (for instance) continue to run access agreements at the level of individual institutions rather than via a levy on the entire sector and an efficient national scheme able to put very considerable resource into robustly evidenced schemes that are known to work best as a whole. Ensuring that expenditure is going to where it has most impact seems a natural wish, and runs slightly counter to the current model.

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

This cannot be quantified without a more detailed understanding of what is being proposed in concrete terms.

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.

The primary concern here is that there does not seem to be a robust protection against course withdrawal or even institutional closure. Students may be at risk, and differentially so depending on circumstances. For example, a mature student with carer responsibilities may be much less able to take up the offer of a place elsewhere than a young student without. It is not at all clear what body will protect students here, nor how a mechanism can be devised that respects both institutional autonomy and students subject to a course or institutional failure.

Question 15:

- 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.

Resource and effort needs to be focused on providers and on groups of students exposed to risk around standards or stability. Established institutions welcome scrutiny and an opportunity to articulate their offering, but protection of students must come first. The consequences for students enrolled on a course of study of course closure or institutional failure are so

grave that the limited resource available for scrutiny must prioritise those most at risk.

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

We do not look back over the last twenty years and see an anti-competitive and risk-averse environment in relation to validation agreements, and it seems curious to seek to relax validation which (in our case) is done with great care and with protection of students involved as the primary goal. Institutions dedicated to high academic standards and strong protection of students are indeed demanding validation partners, but for good reasons. Responsible providers welcome the challenge of high-quality validation agreements.

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.

The one universally endorsed rationale behind the green paper is that students choosing to go to university are making a life-changing choice which will in most cases be outworked over many years. Preserving and raising standards of quality and of protection does not seem compatible with simultaneously reducing the validation, stability, volume, quality barriers to entry. The sector is not without experience here, and a careful analysis of QAA reviews since the opening up of the sector at the start of the coalition administration should be made to inform these developments.

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.

This is clearly needed but impossible to quantify in cost without a clearer sense of what this might comprise. Such a mechanism cannot be structured to spread the cost of variable risks across the sector with the resulting moral hazard – and at institutional level seems to be incompatible with the wish to lower all barriers to entry. The natural mechanism here is simply to require as a barrier to entry that the provider is in a position to provide stability of provision.

Simplifying the higher education architecture (Part C)

Question 18:

- Do you agree with the proposed changes to the higher education architecture?

☐ Yes ☒ No ☐ Not sure

Please give reasons for your answer.

HEFCE has played a remarkable role both in front of and behind the scenes in maintaining institutional autonomy, protecting students from institutional instability, encouraging a healthy marriage of research and teaching, protecting the Haldane principle, increasing wider access to HE, being a credible voice in financial negotiations between institutions and the financial sector, and maintaining threshold standards in QA terms. The proposal do not seem to build in a body with a similar capability. The proposed remit of the OfS is incoherent and internally contradictory, and it is irresponsible to imagine that a body tasked with representing the interests of students will automatically entail an adequate representation of the national interest in the health of the sector and its role in knowledge creation, education, and research.

- 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

The proposed OfS may need to call on expertise to run the TEF, OFFA, HESA and so on. It does need to retain clarity of responsibility for ensuring the health of the sector as a whole and the protection of the arms-length relationship between institutions and government. Contracting out at the same time as reducing barriers to entry risks creating conflicts of interest in tension with student protection.

- If you agree, which functions should the OfS be able to contract out?
- 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,

Option 1 risks undermining institutional autonomy, and is capable of undermining the market dynamism sought. Any public funding of teaching, be it through the SLC or grant, should ultimately follow the student and the choices they make. Option 2 is the only way to protect institutional autonomy and reduce the risk of higher education becoming a political tool. It can only be made to work if the proposed OfS rapidly acquires the credibility enjoyed by HEFCE.

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.

As the market matures the distinction between providers with different histories will shrink, and the only way to protect student interests is to have a uniform regulatory and legal framework. The wish to be light touch and transparent is in tension with the link to fee variation as argued above.

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

The role of Student Unions varies across the sector and this should be reflected in the regulatory framework, permitting recognition of different representative bodies based on unions, colleges, or other structures. The direct question about Student Union transparency and accountability is best addressed through their role as independent charitable organisations.

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.

The duties are too broad in some ways for a single body – the assumption that the interests of students, providers, and taxpayers for example can be represented by a single body is not credible. The duties are too narrow in other ways: one of the success stories of UK HE is a specific articulation of research-led education, and the proposals risk separating research from teaching in a potentially damaging way.

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

☒ Yes

☐ No

☐ Not sure

Please give reasons for your answer.

The OfS clearly needs a stable funding regime and this seems to be the natural model. It is important however that – particular if the OfS chooses to contract out functions to for-profit bodies – that institutions are protected from rising costs and the OfS has clear incentives to control its costs.

Question 22:

- 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.

Managing risk is something that HEFCE did well, and it is an essential function. The idea of financial sanctions is a concern because the most likely source of instability and risk to students, particularly for smaller new entrants, will be financial itself. The model of trusted partnership working in the student interest with a genuinely arms-length body that HEFCE has built up is more effective.

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

This requires a credible arms-length body with status comparable to HEFCE. It also requires an explicit commitment from government that the OfS is seen in that light, and that BIS will not intervene directly in how institutions operate.

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.

Much of this seems to be a straightforward reflection of anachronistic statutes adapting to modern expectations. It is essential that a credible body protects the wider interest of society, in particular in transferring assets to new entities. This will be particularly pressing in relation to hybrid models with for-profit bodies inheriting (for example) land or buildings donated or built up by public bodies.

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?

Durham welcomes the recognition in the Green Paper and the Nurse Review that

- the research ecology is complex and should be viewed holistically
- universities have a key role in training the next generation of researchers and that as a result, research, teaching and knowledge exchange are integrated activities that should not be construed as being in opposition.
- curiosity-driven (discovery) research, translational research and applied research are all essential parts of the research landscape and that the institutional framework needs to fund all types of research appropriately.
- excellent research is distributed across many HEIs and other organisations; consequently grant allocations and QR investment should remain independent via the dual support mechanism, and recognise excellence wherever it is found
- peer review is fundamental to the assessment of excellence
- increasing the speed of response and granting of awards from research councils is desirable

Durham supports the proposals in the Nurse Review for

- more consistent policies, processes and procedures within the Research Councils to reduce bureaucracy and increase effectiveness.
- enhanced support of interdisciplinary research that crosses the existing RC boundaries
- closer integration of the activities of InnovateUK with the Research Councils to provide more effective support for research projects that spans several technology readiness levels. If InnovateUK is brought within the RUK umbrella, it is essential that additional resource is provided to RUK and that support for R&D at TRLs 4-7 is not 'tucked in' to existing Research Council budgets, thereby driving the impact agenda for UK PLC.

Question 25:

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

The following safeguards are required:

- budget allocations need to be set independently of the managing organisation so that the allocations cannot be changed in-year
- the different purposes of QR and grant funding must be recognised and RC funding should not be used as a proxy for determination of QR allocations

- **dual funding should be included as a specific section in annual reports to give accountability and demonstrate levels of allocation across the regions.**
 - **administrative costs need to be transparent and shared appropriately between grant funding and QR**
 - **independent oversight and scrutiny through the Office for Budget Responsibility**
-
- 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?

X Yes

☐ No

☐ Not sure

Please give reasons for your answer

- **QR is a primary source of infrastructure funding in universities and based on REF. This should be distinct from funding for PSREs which are not assessed in the same way.**
- **Investing in universities via QR funding is essential for the diversity and maintaining distributed strengths of UK research**
 - **Recognising and investing in excellence in research across the UK underpins government policies such as the Northern Powerhouse and rebalancing the economy.**

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?

REF provides a mechanism for:

- **evaluating the quality of research across Higher Education in the UK**
- **enabling benchmarking of research within each academic area**
- **providing a mechanism for evaluating and demonstrating the impact of research and its benefits to UK Society and Economy**
- **allocating research funding towards those institutions that can demonstrate the highest research quality**
- **supplying common targets towards which staff, units of assessment and the institution can work;**
- **providing a framework for active research management within institutions**

To ensure that these benefits are preserved, it essential that the requirements of REF and TEF are jointly considered to discourage game-playing (e.g. moving staff backwards and forwards between teaching and research contracts) and to ensure that the rules do not encourage undesirable activities

(such as metric-based assessment that discourages interdisciplinary research or research in entirely new fields).

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

- future REF submissions to include all eligible academic staff, which eliminates the selection of staff and brings the research to the fore.
- eligibility criteria that would need detailed consideration especially in the light of TEF requirements
- for open access, date of publication should be used: using the date of acceptance by the publisher will create an industry around compliance, and lead to considerable additional expense in universities. There is also the danger of an industry developing around staff moving their publications from one institutional repository to another when they move institutions.
- Greater use of metrics for the environment and impact template, greater standardisation of evidence for case studies.

Lengthening the REF cycles from six to ten years would allow for a mid-cycle refresh using metrics. This is preferable to a refresh at three years, which is likely to lead to two sets of different institutional REF-industries and be counter-productive in the light of reducing burden. Careful thought would have to be given, however, to avoiding perverse incentives inherent in the use of metrics, in terms of gender diversity and academic age. Additional funding would also be required to support emerging research areas highlighted by metrics.

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

- Use of existing data sets to underpin RIM would ensure increased accuracy and completeness of data.
- Ensuring interoperability of systems is a key factor to ensure consistency and save staff time.
- Systems need to capture both quantitative and qualitative data. For example, reporting on how many staff have been trained does not give an indication of the content or quality of the training delivered.

Existing reporting summary

Data set	Use in REF	Use in TEF
HESA staff return	Yes – defines staff roles and can be used as basis for UoA; include annual monitoring of ECRs and	Yes – defines staff roles. In both cases it is important that HESA data is robust and audited.

HESA Students return	most appropriate UoA PGR SSR; PhD student data already used in Environment	Yes – UG and PGT SSR
HESA Financial return	Research income already used in Environment	
HESA estates return	Yes – to underpin research environment narrative	Yes – underpin teaching environment narrative
HEBCIS return	Yes – to underpin impact strategies and research environment	
ResearchFish	Interoperability with other systems and completeness of data need addressing amongst other issues	
Citations	Not relevant in all disciplines – only used in 1/3 of REF2014 UoAs; use only to support peer review, not to replace it	
RCUK income in kind (use of large supported facilities)	Yes – environment data; RC record keeping needs to 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.

Durham University welcomes the emphasis on the educational experience in the green paper and is eager to work with BIS to ensure that the well-being of the sector and the interests of future students are protected. We are concerned that some of the proposals could undermine our own ability to provide a genuine research-led educational experience in an environment that respects the importance of the diversity of institutions and of provision. We would be happy to be involved in or consulted on any matters of the development of the TEF and the OfS.

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 X

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?

X Yes

☐ No

BIS/15/623/RF