



HIGHER EDUCATION STRATEGIC PLANNERS ASSOCIATION

Response to the BIS Green Paper

January 2016

Higher Education Strategic Planners Association
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Please return completed forms to:

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Email: consultation.he@bis.gsi.gov.uk

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
x	Representative Body
	Research Council
	Trade union or staff association
	Other (please describe)

Dear Ms Haines,

Thank you for the opportunity to contribute to the consultation with regard to the BIS Higher Education Green Paper. This response is from the representative professional body, the Higher Education Strategic Planners Association. Some introductory information follows. We hope that our contribution is helpful - we believe particularly that as an organisation we will be able to help advise on the technical consultation, as much of our work is in data analytics, planning and implementation.

Yours sincerely,

Lucy Hodson (Chair until February 2016).

Who are Strategic Planners in Higher Education institutions and providers and why will their view be important for the Green Paper?

Planning offices in universities – and now increasingly in new alternative providers – fulfil many functions, but their overriding role is the construction, formalisation and execution of strategy, including responses to Government policy, within higher education organisations.

To do this, the marshalling and analysis of historical and projected data plays a key role – planners are the people in institutions who use evidence to support their senior teams in decision making.

Planners are the staff responsible for assuring, and in many cases actually submitting, statutory returns to government and government agencies, for forecasting student numbers, for setting and reporting on key performance indicators and for scenario planning and for impact assessment of any new institutional decisions or policies.

In most institutions, planning offices are heavily involved in developing the institutional response to the Green Paper because:

- Planners can assess the strategic implications of all elements of the Green Paper dependent on their in depth knowledge of their own institution's performance.
- Planners understand many of the technical issues raised by the Green Paper. Planning offices will be the main submitters of returns with regard to the forthcoming technical consultation.

What is the Higher Education Strategic Planners Association?

HESPA was set up formally two years ago, as a natural development of an existing network of planners gathering to organise an annual conference and to lobby with regard to planning issues. The organisation - a professional body under the Professional HE Services umbrella - grew rapidly and is now an institutional membership organisation of 123 higher education institutions. Our website is at www.hespa.ac.uk; we have had a permanent office base for just over a year and are governed by a 16- member executive which is broadly representative of our member institutions.

How representative of the view of planners within the sector is this response?

This response has been put together by a sub-group of the HESPA Executive Group and endorsed by the Executive. Overall responses which BIS will receive to key parts of the Green Paper will vary depending on the position of different universities within the sector; HESPA has however attempted to restrict our responses to elements of the Green Paper where planners will have similar views, as well as to suggest aspects of design and implementation which may require further consideration, rather than to propose an answer which may favour one particular part of the sector.

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

☐ Yes

☐ No

☐ Not sure

Please provide any further relevant 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.

HESPA welcomes any initiative which will help to continually improve the standard of teaching in higher education providers.

As planners, who draw on a wide range of institutional, national and international data sets both for detailed planning and for strategy development in their universities, HESPA welcomes the move towards developing robust ways of measuring improvements in how higher education is delivered and its effectiveness. In this respect, HESPA looks forward to working with BIS to assist in the endeavour to find meaningful and robust data sets and ways of using that data in fair and transparent ways to improve student choice and learning gain.

As a UK-wide organisation, HESPA urges the development of the TEF in such a way as to facilitate the speedy inclusion of Wales, Scotland and Northern Ireland, to ensure the maintenance of the public perception of a high quality UK HE sector.

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.

See below. In general HESPA supports the use of sound evidence to support assessments of quality, and that the TEF is going in the right direction. However, there is still much work to be done in relation to contextualisation, benchmarking, controlling for small data sets and an assessment of the appropriateness of the qualitative evaluation such as the NSS, before the evidence can be robustly marshalled to be used as real quality indicators.

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?

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.

We answer questions on differentiation under Question 8.

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.

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.

- a. Our members are often responsible for fee planning, and the development Access Agreements or the equivalents in the devolved administrations. The complexity of administering slightly different fees for multiple cohorts – for universities but most particularly for the SLC over time, together with the prospect of fees going down again if TEF performance is not maintained, is probably impossible to manage, particularly with CMA issues added to this.

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 do not agree with differentiation based on the metrics cited in the Green Paper alone:

- a. This section refers to the use of raised fees as an incentive. Our experience of how improved reputation – through such things as better student satisfaction and employability – has an impact on ability to recruit students is a very major incentive for universities; the TEF kite mark will only add to factors which enhance reputation and will be incentive enough without the link to fees.
- b. An attempt to make major differentiations using a data set such as the NSS, where there is very close clustering of institutions around a narrow band of performance is not a robust use of data. Institutions with lower student numbers are particularly vulnerable to fluctuations year on year.
- c. League Tables are referenced in this section of the Green Paper. We have three points to make:
 - a. The TEF must not be simply be a rubber stamping of the League Tables, which draw on a set of proxy data for quality, but where – because of very similar performances – league table positions can change drastically from one year to the next. League Table compilers are not accountable to students, taxpayers or the government.
 - b. This could in part be avoided by the use of averages over time, instead of annual data. There are precedents for this use of data.
 - c. HESPA has worked closely with HESA and League Table compilers in developing a process and resources to ensure that League Tables at least draw on important contextual information when interpreting a data set. E.g. if an institution has recently closed a department, there will be fluctuations in student numbers as at least one effect of this. We would urge a similar process of contextualisation for the TEF, and the use of rigorous benchmarking to take account of different institutional profiles.
- d. There are huge issues about differentiation at institution level because of the very substantial effect on the data because of different subjects. We understand the requirement of the TEF to assess at discipline level; however, aggregation to produce an award at institution level will need to be done with very robust benchmarking to take account of variations between disciplines, and the effect of the different student cohorts. This methodology will take time to develop, particularly if it is not to generate perverse behaviours – such as the closing down of disciplines which are shown to perform worse in TEF metrics, to the detriment of universal HE provision in the UK.
- e. In terms of the level of differentiation required, we consider that further analysis of the current data is required as universities are delivering already high levels of student satisfaction for instance.
- f. As planners, we use both quantitative and qualitative methods to develop plans and strategies and evaluate their implementation and effectiveness. We recommend that there is **a strong narrative element** included in the development of TEF assessments. Our members have much experience in

developing both quantitative and narrative frameworks for performance enhancement in our institutions.

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.

- a. We understand that there will be need to be decisions about fee levels, but would urge that they are not linked to the TEF.

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.

These are all absolutely valuable qualities to measure in teaching and higher education generally – the challenge is how these should be measured fairly.

We support the statement that the TEF must be simple in its processes, but robust in its judgements in order to maintain the confidence of students, the sector and other stakeholders.

From our experience in using data for strategic planning – one year's data will never provide enough data to plan effectively for the next year. We therefore offer the following observations on issues around metrics:

- One system cannot serve quality, choice and competition and markets agendas: There is a danger of asking one process/system, such as the TEF to deliver too much.
- In our letter to David Willetts in April 2014 and in our representations to HESA with regard to their transformational projects, we have stated and continue to state that one principle of high quality data is that data collected with one specific purpose in mind is not then made to serve another purpose – as happened with qualifications on entry data at the time of the introduction of the AAB+ differential for the SNC. There is a real danger that this will be what happens with the TEF,

as proxy datasets are used to deliver on quality, student choice and CMA indicators, before there is time to develop new data sets.

- We welcome the reference to “centrally collected and benchmarked data”. We welcome the opportunity to work with BIS on the technical consultation to ensure that proven methods of benchmarking are used, such as have been developed by HESA, and drawing on further benchmarking work which HESPA has been developing with HESA.
- We believe that there is potential to develop new data sets and would welcome the chance to advise on these; as well as urging that the Higher Education Statistics Agency plays a central role in this exercise.
- The four measurements in the question beg a narrative - there should be a strong narrative element in the TEF assessment process.

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.

- Planners have been involved in the implementation of the NSS and particularly in how the data is interpreted. Most of us lead on the collation of the Key Information Sets in our universities. We think it is important that BIS recognise that the NSS has been transformative in putting the student learning experience at the forefront of university plans, but that the survey was never designed to be used relatively.
- Universities have used the NSS findings very successfully as one of the metrics in their quality assurance processes, but there are serious problems in using the data relatively – for instance, the consistent difference in NSS results between disciplines.

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.

Planners are often those in their institutions charged with the formulation of Access Agreements and are familiar with the different data sets drawn on by universities in developing their outreach policies and measuring their effectiveness.

We also strongly support an evidence-based approach to widening participation of HE to disadvantaged groups.

However, we would wish to state that we do not believe that this important development work should be assessed as part of an assessment of teaching excellence, but rather as separate exercise linked to Access Agreements. Incentives to undertake outreach etc are already built into Access Agreements. Similarly there are incentives and compliance issues in relation to equality issues. We believe that the metrics which support Widening Participation are related to but separate from those around Teaching Quality.

- 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?

In terms of the data used to support widening participation activities and as users of UCAS data ourselves to support institutional decision making, we support the proposal that UCAS is required to make available additional admissions data earlier, to improve our ability to assess the effectiveness of outreach and retention activity.

We recommend that UCAS data is made available for use in the development of national data capability with regard to HE, for example, by inclusion in the enhanced HEIDI plus HE database.

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

See above. Some of the additional costs could be avoided if the UCAS data is integrated into the HEIDI+ database of HE statistics. All subscribing universities of HESA are given access to this database, and the improved service is much easier to use.

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?

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.

We support the maintenance of an arms-length public body in relation to HE regulation.

Given the operational issues which could ensure for universities, we would advise that grants are not administered by the SLC.

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?

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

No answer, but see below comment:

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,

The strength of the UK HE sector lies in its diversity, and we would urge that the expertise and professionalism built up in a body like HEFCE is maintained in OfS so that there is an understanding of the diversity of the sector.

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?

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.

As planners, our role within institutions is to make connections between the many activities within our institutions, particularly teaching and research. Our planning processes promote research –informed teaching, for instance. We are therefore concerned at the lack of space in the Green Paper for the interface between teaching and research, and the paper's silence on research students.

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

☐ Yes ☒ No ☐ Not sure

Please give reasons for your answer.

We believe there may be a conflict of interest between a body which is funded by institutions and student interest and would urge a re-examination of the funding model for the OfS.

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?

Many planning offices play a role in their institutions' research strategies, for example, by being responsible for collating and impact-assessing the Research Excellence Framework.

Planning functions in many universities are involved in assessing metrics for research assessment.

While we support the further development of metrics to support the Research Excellence Framework and have expertise to offer in this regard, we are certain that peer review should be maintained, as advocated by Andrew Wilsdon. By maintaining this peer review element, the last REF enhanced the reputation of UK research internationally

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.

Our members come from 123 different higher education providers positioned across the mission groups and none. As an organisation we do not take positions which might be seen to favour one particular type of higher education establishment over another. We are however concerned that the high quality of UK higher education is maintained – through effective governance, sound planning and foresight, and robust and ethical use of evidence and metrics.

We have expertise to offer in the design and formulation of new metrics and hope that we might be called upon to assist BIS in the technical consultation.

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