

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

Response Document



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Introduction

On 6 November 2015, the Government released the controversial higher education green paper “Fulfilling our Potential: Teaching Excellence, Social Mobility and Student Choice”. The Green Paper sets out proposals to stratify education based on a graduates’ perceived economic value, suggests transferring the power to set tuition fee caps to the secretary of state, and attempts to limit the freedoms of students’ unions. Consensus surrounding the Green Paper is that it is a ‘Trojan Horse’ for raising tuition fees, privatisation and marketization of academia, and an attack on academic freedoms which will ultimately lead to stratification and ghettoization of higher education.

This document alone has caused considerable anger among universities and students’ unions, however when taken in context with other changes to higher education being imposed by this government, the Green Paper has caused major concern. It is widely regarded to be the biggest change (and threat) to the higher education sector in a generation.

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Imperial College Union’s response to the Green Paper marks the start of a long running campaign against the aforementioned proposals, many of which are unpalatable at best but totally unacceptable at worst. We are determined that any changes to the layout of the higher education sector will be made with meaningful student input. To this end, we refuse to be only bystanders and we will not merely accept a seat at the table, but will demand a voice as the primary stakeholders.

Executive Summary

Imperial College Union welcomes the opportunity to give the opinion of its members on the proposals contained in the Higher Education Green Paper. Broadly, the document raises significant concerns, which can be summarised in three themes:

1. The proposals are rushed

The suggested timeframes for introducing the successive stages of the Teaching Excellence Framework (TEF) are far too short. Having the first level of the TEF in place for only one academic year, with levels 2- 4 implemented in year two, is an extremely compressed timescale that does not recognise the complexity of enacting meaningful change at an institutional level.

The Green Paper suggests that the assessment procedure for levels 2 - 4 would be completed and the results announced by spring 2017; not even one full academic session will take place between the present and that proposed deadline. Sector experience with high-level institutional reviews, such as the Research Excellence Framework (REF), Institutional Audits and Higher Education Reviews, shows that a much longer timeframe is necessary for implementing the consequent changes and preparing for the next cycle. These existing programmes can have as much as six years elapse between instances.

By operating on a far shorter timeframe, the TEF proposals introduce an unnecessary risk of having inappropriate and low-quality metrics established as the guiding data for major funding streams - which would be difficult and disruptive to reverse. Instead, in order for a TEF-like proposal to be genuinely useful for prospective students and respected by the sector, time must be invested in creating meaningful and reliable models and data upon which decisions can be made.

2. The proposals rely on poor and inappropriate existing datasets

The datasets and metrics currently available to students and institutions - such as the National Student (NSS) and Destinations of Leavers from Higher Education (DLHE) surveys - are not universally considered to be meaningful and reliable

indicators upon which funding decisions should be made. Furthermore, these measures cannot and should not be equated to teaching quality.

3. The proposals create perverse incentives

Arising from the above flaws, and the linking of arguably distinct topics (such as widening access and teaching quality) throughout, the Green Paper inadvertently creates a number of perverse incentives. As currently proposed, many of the measures - intended to drive up quality, widen participation and simplify the sector - pose the risk of disrupting existing projects and incentivising damaging behaviour by individuals and institutions.

For example:

- If NSS scores are mechanistically linked to tuition fees via the TEF, students may consider giving lower scores than they would otherwise if they believe that will hold down the costs of study at their institution.
- If graduate salaries are used as a metric of success for the TEF, institutions would be incentivised to close courses that produce graduates with lower average starting salaries, regardless of the cultural or economic importance of the subject matter. Additionally, without proper recognition of the value of further study,
- If every course has to have a contingency plan for failure, smaller and marginally-viable courses may close rather than continue.

Additionally, we are deeply concerned about the proposal to empower the Secretary of State to set tuition fee caps without Parliamentary approval. We strongly believe this to be a completely inappropriate course of action that fails basic tests of transparency, accountability and scrutiny, and contravenes our democratic values.

PART A: Teaching Excellence, Quality and Social Mobility

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

Imperial College Union supports any efforts by the Government to champion and further equality with regard to all protected characteristics enshrined in the Equality Act 2010.

However, in the context of other recent reforms to student funding and support, we are not convinced that the Government is making access to higher education fairer or more equal. The freezing of the student loan repayment threshold (as announced in the 2015 Autumn Statement) has been found to be deeply regressive, hitting middle-income graduates harder than higher-income ones; additionally, the changes to Disabled Students' Allowance have reduced the support available to the students who need it most.

Although it is encouraging to see the Government state an aim to improve access to education for students from lower socioeconomic backgrounds, Imperial College Union would like to challenge the Government's claims that the Teaching Excellence Framework passes the 'Family Test' and propose that the Green Paper would not pass this poorly validated test of policy sensibility when applied to less-well-off-than-average families. Increases in student debt, when coupled with regressive changes to repayment methods, are directly linked with delays in marriage, stable tenancies and home ownership.

A major concern we have is that the Green Paper's attempt to raise fees for certain institutions and disciplines will lead to a stratification or ghettoisation of higher education. To quote Gordon Marsden, Labour's shadow minister for higher education and further education: "this is looking like a Trojan Horse for increased tuition fees and a two-tier system where this government effectively brands some universities as second-class, with the consequent impact on their students' life chances.". We are alarmed by the potential for variable fees implied in the Green Paper. It has be evidenced that those from lower socioeconomic backgrounds are more debt averse than those from more advantaged backgrounds. As such we worry that the proposals are likely to become a barrier to students from low income backgrounds to high quality university education.

As the representative body for students at a world-leading STEM university, Imperial

College Union is concerned that the Green Paper's proposals will lead to a considerable uplift of fees at our institution and thus cut out a huge number of talented, intelligent students from lower income backgrounds from gaining access to the incredible opportunities an education at Imperial affords. Not only is this directly contrary to the government's own reference to social mobility in the Green Paper's title, but also dilutes the quality of students and thus graduates entering the employment market upon graduation.

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

The discussion in this Paper is insufficient to enable stakeholders to make an informed decision. We suggest that the Government commission an independent body to complete a full equality impact assessment of the changes, with particular focus on women, BME and Disabled students, as well as those from disadvantaged backgrounds.

2. How can information from the TEF be used to better inform student and employer decision making?

In its current form the TEF is merely a repackaging of existing data presented as unvalidated proxies for 'excellence'; this is in no way conducive to informed decision making. Imperial College Union believes the TEF will only be informative for prospective students if the information presented is new, credible, and robustly measures teaching excellence. By the Government's own admission, the metrics currently available and proposed in the Green Paper are only "imperfect proxy measures" for the enshrined concept of 'teaching excellence'; for this reason Imperial College Union is puzzled as to why the Government is being so hasty to pass the TEF without taking time to develop proper metrics which will be of genuine use to students.

The three sets of common metrics proposed in the Green Paper (employment/destinations, retention/continuation, and student satisfaction) are extremely narrow and fail to take into account the broad range of other factors considered by prospective students when choosing a university and degree course. In order to make an informed decision, students should ideally have access to information which showcases:

- Teaching quality: this should be based on accurate and robust measures of quality. We implore the Government and sector to invest significant time and effort into developing and validating such measures before implementing any policy which refers to 'teaching excellence'.
- Levels and forms of support available to students in order to maximise their success, including both educational and pastoral support mechanisms.

- The experience of life at a given university and its locality. Satisfaction with a university education is about far more than the degree course. As an example, Imperial College London may not be suited to all due to the intensively academic nature of its courses and its location in the middle of a bustling metropolis. Prospective students should be certain that they can tolerate living and working in a given town or city when selecting a university, and that the particular ethos and culture of an institution is to their taste.
- Opportunities for additional professional development; this may include access to work placements or internships, individual research projects, study abroad placements, or industry accreditation.
- Extracurricular and co-curricular opportunities make up a considerable part of the university experience and play a huge part in student decision making. For example, Imperial College London offers a highly competitive music scholarship in partnership with the neighbouring Royal College of Music, boasts two top flight rowing clubs with international competitors as members and a Students' Union with more clubs and societies than any other. All of these play a role in the appeal of Imperial College London beyond its world-class academic reputation. Imperial College's new Strategic Plan outlines the importance of extra-curricular activity as a fundamental part of the student experience through its partnership with Imperial College Union.

It is unclear how the TEF will further aid employer decision making. Employers are well known for making recruitment decisions based on far more than just academic attainment. It is an intellectual insult to both graduates and employers who have developed highly rigorous processes of selection involving a variety of different assessments to assume that employers will make recruitment decisions based on broad and imperfect proxy measures of the quality of teaching a candidate received while at university.

With regards to the proposed introduction of a Grade Point Average (GPA) system, we agree with the concerns of Imperial College London:

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

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?

If the TEF is to include taught Master's courses, consideration must be given to the more specialised nature of these courses, the small sizes of each cohort and the interdisciplinary nature of many of them. There are over 100 Master's course available at Imperial, compared to 20-25 Undergraduate courses; some have cohort sizes in the single digits; many are run by small teams or even individuals, who may choose to discontinue the course if their administrative burden increases. That said, it is important that measures are put in place to monitor and improve teaching quality in Master's courses, as due to the reductions in government funding for undergraduate study, Master's courses could be increasingly conceived and delivered as 'cash cows' for HEIs, increasing the risk of students losing out in terms of quality.

4. Where relevant, should an approved Access Agreement be a prerequisite for a TEF award? What other mechanism might be used for different types of providers?

Imperial College Union highly values the Access Agreement arrangements currently in place, and we believe they have contributed positively to Imperial College London's bursary provision; we would oppose any measure to weaken or remove them. However, we agree with the College that it would be inappropriate to include factors that are not directly related to teaching quality into a Teaching Excellence Framework.

5. Do you agree with the proposals on:

a. What would constitute a 'successful' QA review

We agree with the College that the definition of a 'successful' QA review in the Green Paper is too narrow, as it does not allow for low-risk institutions whose most recent audit was under the Institutional Audit scheme rather than the Higher Education Review scheme, to be included.

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

We have no comment to offer on this question.

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

We disagree with the proposals as currently scheduled; as explored above, we believe that this timeframe is too short to allow robust metrics and processes of measuring teaching excellence to be implemented. We agree with the College that a period of pilot schemes and preparation, in order to establish sector and student confidence, would be necessary.

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

a. Timing

We believe that the proposed five-year interval is too long to derive meaningful quality improvements. A period of five years will see almost two cohorts passing through in between TEF assessments; a further five cohorts will have passed through between the first and second set of TEF assessments. Any changes will therefore be protracted and not give sufficient impetus for institutions to address pressing issues in a speedy manner.

b. Assessment panels

It is vital that the voice of students is effectively represented on any assessment panel in regards to the TEF. We fundamentally believe in the power of students as partners in their education, however the engagement of the student voice in this process must go beyond simply adding a student member to a high-level assessment panel. There must be additional work to ensure that students are able to give substantial input, and ensure that the students' input is not superficial or tokenistic.

As we will discuss later, it is in institutions' own interest to support and engage with strong and capable students' unions. The development by students' unions of institutional knowledge, a coherent and detailed local educational policy and the nurture of successive cohorts of skilled student academic representatives will yield dividends for universities; it is the only way they can have meaningful and useful student input, and is a prerequisite for being truly assured that their educational offering is well-regarded by their students and continually improving in quality.

Student input into TEF assessment panels should be viewed as one of the outcomes of engagement with students at all levels across the institution; at Imperial College

London, a network of 500 academic representatives enables student partnership at module, course, department, faculty and institutional level. In their own submission to this consultation, Imperial College London explicitly recognises the value and benefit they receive as a result of Imperial College Union's expertise and contribution to academic debates.

c. Process

We would be interested in seeing considerably more detail about the composition and methodology of the proposed assessment panels, in particular what administrative and policy support will be given to student members. We are particularly concerned about the possibility of 'regulatory capture' if the dominant voice on these panels is that of academics rather than students.

We agree that an appeals process would be necessary.

7. How can we minimise any administrative burdens on institutions?

We have no comment to offer on this question.

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

We have no comment to offer on this question.

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

We have no comment to offer on this question.

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

Imperial College Union broadly agrees with the three main aspects covered here. We would like to see the Government present more specific information before proceeding with the TEF.

Teaching quality

We agree that students should be “intellectually stimulated, actively engaged in their learning, and satisfied with the quality of teaching and learning”. However we feel more emphasis should be given to these areas with specific metrics to define each point.

In agreement with Imperial College London, and as discussed above, Imperial College Union believes the TEF should take into account alternative educational opportunities offered by some institutions. For example, Imperial College London offers a large number of Undergraduate and Master’s-level programmes which include an individual research project as a key component. Opportunities such as these provide students with an additional set of skills, knowledge and competencies, giving many an edge either in the graduate employment market or when pursuing careers in research. We feel the TEF should reward institutions which provide students with novel or unique opportunities for open-ended and individually directed experiences, not those which merely spoon-feed knowledge to their students. We believe that an ethos of fostering and growing each student’s love and passion for their chosen subject is a fundamental element of excellent teaching.

We are extremely uncomfortable with the notion that research should be separated from undergraduate teaching and believe such a move would greatly limit the opportunities for development available to undergraduates. Conversations with Imperial alumni demonstrates the huge value placed on undergraduate research experience by students, employers and postgraduate supervisors alike. Not only do opportunities for individual research projects boost student choice, they also equip students with highly valuable skills including problem solving as well as individual, critical and innovative thinking. The opportunity for Postgraduate and senior Undergraduate students to work as teaching assistants in research-focused environments also gives the academics of the future the possibility of honing their teaching abilities very early on in their careers. The Government should be wary of underestimating the value of research opportunities as unparalleled intellectual experiences.

Teaching excellence can be driven through positive celebrations as well as establishing metrics to measure satisfaction and dissatisfaction. Through our Student Academic Choice Awards (SACAs), students at Imperial regularly share the impact of brilliant teaching and give detailed and passionate examples of innovation and dedication in this area. Launched in 2012, the SACAs have grown considerably in participation and prestige; 2015 saw 800 nominations across all categories,

with almost half of those falling in the category of 'Best Teaching for Undergraduates'. As well as offering a route through which students can thank excellent individual members of staff, the SACAs generates a significant dataset of teaching and supervision excellence - over 250,000 words of testimony so far - which is being used by Imperial College Union and the College's Educational Development Unit to champion and improve teaching standards across the institution.

Imperial College London has recognised that in order to increase teaching quality it is best to reward and recognise the areas of best practice. The College has developed and delivered training for those who teach based on case studies and examples of innovative and impactful teaching.

If the TEF is to be successful it must look to examples such as the SACAs or other Student Led Teaching Awards to understand how students can be proactive partners in their education, and acknowledge that they are able to contribute significantly to curriculum design and teaching standards. There must be more incentivisation both at an institutional level and locally of student-centric innovative methods of teaching which enthuse students about their subject.

Learning Environment

Imperial College Union welcomes the Green Paper's emphasis on high quality learning environments, but we feel the definition of learning environment presented here is limited and unimaginative. In particular, we would like to see a strong focus on quality spaces and resources - both physical and virtual - and a discussion of future developments.

As an example, we believe that learning environment should push for the provision of quality learning spaces that allow for collaboration between students and which inspires and encourages one to think freely and learn constructively. E-learning strategies, and the provision of high quality virtual resources, should also be an important factor for consideration.

Student Outcomes

We are disappointed to see such heavy emphasis on employment outcomes and feel strongly that the TEF should place equal weight on the transformative nature of learning and progression to further study, particularly higher level research degrees; in this respect, we are in agreement with Imperial College London. The UK has a world-class reputation for top-quality research, which will only continue to flourish if students wishing to continue in academia are afforded the same respect as those preferring to enter the graduate employment market.

Furthermore, Imperial College Union believes that intrinsic educational value and scholarship should be more prominent throughout the TEF. Future employment is by no means the only positive outcome of a university education and many students place value on the experience of being challenged intellectually, and the simple opportunity to broaden and improve their minds.

At present we believe that there is no credible method for consistently measuring 'learning gain'. We are not comfortable with the Government proceeding to implement the TEF using crude metrics such as the relationship between entry requirements and degree classification. There is a need for such metrics to be rigorously piloted to test their validity and feasibility in context before implementation.

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?

The common metrics currently proposed in the Green Paper are wholly inadequate, inappropriate, and in their current form completely contrary to the 'key principles for metrics and institutional evidence' set out in the Green Paper itself. The Government's own expectation is that effective metrics will be valid, robust, comprehensive, credible and current, yet no such metrics are detailed.

The three common metrics (employment/destination, retention/continuation, and student satisfaction indicators) do not truly relate to 'teaching quality' in any way and were never developed to be associated with teaching quality; they also fail to take into account the nuanced variation between institutions. These metrics are therefore neither valid nor comprehensive.

Imperial College Union does not believe that these three common metrics will garner sufficient support from the sector to be considered credible. We welcome the Government's proposed technical consultation and recommend that it gather sector opinion on metric methodology, as we believe very strongly that taking these three common metrics forward in their current form would be irresponsible.

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?

We support the notion that the Director for Fair Access be given specific guidance regarding access to education for BME and disadvantaged students. However, the Green Paper contains little detail about the specific nature of any new measures.

We are in agreement with Imperial College London that teaching quality and access to higher education are separate issues and should be kept as such. We believe that the Government must improve investment at earlier stages of education in order to give students from disadvantaged backgrounds the opportunity to truly be able to compete with their advantaged counterparts.

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

We agree that the Office for Students should be empowered to reject Access Agreements for institutions whose outcomes relating to access are not satisfactory. However, this decision must take into account the local factors that may affect each institution, and a robust warning and appeal system must also be created due to the considerable impact that such a decision will have.

We do not agree that the Office for Students should be able to set targets for individual institutions, as they are unlikely to be able to give full consideration to institutional and local factors. An enhanced role in holding institutions to account for their own plans should be sufficient; we do not believe that such a role would be a breach of institutional autonomy.

c. What other groups or measures should the Government consider?

We have no comment to offer on this question.

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

We have no comment to offer on this question.

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

We have no comment to offer on this question.

PART B: The higher education sector

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

We have no comment to offer on this question.

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

We have no comment to offer on this question.

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

We have no comment to offer on this question.

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

We have no comment to offer on this 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?

Imperial College Union supports measures from the Government to provide robust protection to students should they be unable to complete their program due to factors beyond their control.

We also agree with Imperial College London that it would be an unnecessary and disproportionate burden to ask that each course or department prepare a contingency plan; instead, a set of binding

principles and protections, over and above statutory rights, should be enumerated at institutional level, in consultation with students' unions.

Financial compensation must be provided as part of a contingency mechanism, and the rebate must be in full - including both spent and unspent tuition fees. Furthermore, in such circumstances, students may have experienced substantial lost time, opportunity and investment (for example, where a student is at an advanced stage of their program when it is cancelled), and we believe strongly that the students should also receive additional compensation proportionate and representative of such lost opportunities and investments.

Assistance to collapsing Universities is appropriate, but quality control measures must be maintained at a high standard to ensure students don't suffer from a subpar experience post-institutional implosion. We agree with Imperial College London that it would be inappropriate, even risky, to create a mechanism by which viable institutions are expected to 'bail out' failing ones; we also recommend that institutional mergers are not used as a rescue mechanism unless in the genuine interest of each institution and of the sector as a whole.

PART C: Simplifying the higher education architecture

18. a. Do you agree with the proposed changes to the higher education architecture?

While we welcome proposals to place students' interests at the heart of the sector, we are concerned that institutional interests would remain dominant; as mentioned above, 'regulatory capture' is possible unless genuine and meaningful student engagement via students' unions is enabled.

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

Preserving the institutional knowledge and experience present in existing bodies, such as HEA and HESA, would be the most efficient approach.

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

We have no comment to offer on this question.

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

We agree with Imperial College London's response to this question:

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

"A key priority of funding teaching in higher education should be to ensure that the

quality and reputation of UK higher education is maintained and enhanced. In order to achieve this, it is imperative to ensure that institutions are able to recover the full costs of teaching, particularly in relation to high cost STEMM subjects. As discussed under Question 9 above, despite the increase in the maximum tuition fee level in 2012-13, the College is continuing to experience a deficit in Home/EU undergraduate teaching in high cost STEMM subjects which has grown as tuition fee levels have not increased with inflation (£9,000 in 2012 is equivalent to £8,460 in 2015). The College is currently making an average deficit of around £2,000 on every Home/EU undergraduate student. Any increases in tuition fee income in line with inflation would simply be used to cover inflationary increases in costs, at best maintaining this deficit. The provision of high-quality, research-led STEMM education is resource-intensive by its very nature and necessitates expensive facilities and the use of high cost consumables. If the combination of teaching grant and tuition fee income continues to be constrained below full cost, this will result in Home/EU undergraduate STEMM provision becoming increasingly unsustainable. Institutions may be forced to reduce their Home/EU undergraduate numbers further and further, not on the basis of poor quality, but because of severe under-resourcing. This would lead to less choice and diminishing opportunities for Home/EU students in STEMM disciplines, and to a wider impact on the UK economy where there is already a shortage of suitably qualified STEMM graduates.

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

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

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

Imperial College Union welcomes the concept of a straightforward regulatory system and agree that such a system should enforce minimum standards on quality, information and student protection. However, we are uncomfortable with the emphasis on the interests of taxpayers (and indeed employers) in this section and throughout the Green Paper. The title alone of 'Office for Students' suggests heavily that this body should be solely upholding the interests of students. Our concern is that trying to balance the priorities of students against the priorities of taxpayers and employers will lead to a damaging conflict of interest from the very beginning.

We are in agreement with Imperial College London that this regulatory framework should explicitly respect institutional diversity and academic freedom. We are concerned that any regulatory framework lacking this flexibility will lead to homogenisation of Higher Education and thus reduce the choice available to prospective students. ICU is also concerned that one of the unintended consequences of the Green Paper will be a loss of degree courses of cultural and academic importance which are not considered to be of 'national importance'; in our view this would constitute a direct reduction in academic freedom and further reduce student choice.

Currently the details of this regulatory framework are insufficient to substantiate the Government's somewhat spurious claims that "Students would have the information to make the best choices and the protections they need.", "Students and taxpayers would get better value for money", and "Providers will benefit from regulation limited to what is necessary".

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

Imperial College Union strongly opposes any attempt by the Government to further regulate the activities of students' unions. The purpose of students' unions is to ensure that the needs and interests of students are upheld at institutional, local and national levels; any attempt to stifle this will be met with powerful opposition from across the students' union sector.

Imperial College Union, like many students' unions, holds independent charitable status; as such the comparison with trade unions is wholly inappropriate, and frankly misguided. Students' unions are already regulated effectively, by our parent Institution through the Education Act 1994, and by the Charity Commission in Charity law. These regulations, combined with the inherent requirement on the Union as a democratic membership organisation means that Students' Unions are significantly transparent and accountable. These are values to which we and the entire sector

are deeply committed to upholding. There is therefore no need for students' unions to be brought under the trade union umbrella.

The funding we receive from Imperial College London is mutually agreed by both parties and based on the additional benefits the presence of a strong students' union affords its members: the students of Imperial College London. We provide a huge volume of opportunities to our members which the university cannot offer. These include volunteering opportunities and leadership experience through our Student Development department and over 340 clubs and societies, giving students an outlet from the intensive demands of their degrees, as well as opportunities to gain management experience by running clubs and societies. We provide students with a vast array of opportunities for personal and professional development through all of our democratically elected volunteer roles as well as by employing students up to managerial levels in our bars and retail outlets. We would like to remind the Government how many successful and eminent politicians cut their teeth in the world of students' unions. Clearly we are capable of providing our members with a huge number of opportunities to develop new skills and improve their employability. Restricting our ability to do so will be contrary to the Government's aim of improving the value of graduates to employers.

We have an incredibly strong and productive partnership with Imperial College London, which is also detailed in the College's own response to this Green Paper. Student representatives have input on almost all decision making boards at Imperial College London, including College Council and College Senate. Elected student representatives chair staff-student committees and student-facing project boards at departmental, faculty and institutional levels. Moreover, Imperial College Union and Imperial College London organise and chair joint committees annually where elected student representatives can work directly with members of College's senior leadership to address major items of feedback.

As another example of this strong partnership, Imperial College Union is delivering a high degree of student scrutiny at every stage of the appointment of Imperial College's new Vice Provost (Education). This includes student officers being entrusted to independently organise and execute an interview panel for the candidates.

As further examples, we can present the Government with numerous cases of our collaboration with Imperial College London for the benefit of our students, including:

- As cited in Imperial College London's response, in early 2015 we worked closely with the College to develop several different pricing structures for rents in halls of residence. These options were then democratically voted on by our Union Council, resulting in our preferred option being implemented.
- Imperial College London offers a highly generous and robust bursary package to its home undergraduate students, the structure of which was developed in conjunction with Imperial College Union.

Imperial College Union and Imperial College London therefore strongly caution the Government against introducing reforms which may threaten constructive relationships of this kind.

These sorts of relationships also make an extremely strong case for the Government to work collaboratively with students' unions throughout the country and the National Union of Students. As is being actively demonstrated constantly at Imperial, working together is a far more productive means to ensuring the needs of students are met than the more adversarial style of working threatened by the reforms proposed in the Green Paper.

If the Government truly intends to uphold the needs of students, as stated in the Green Paper and the proposals for the Office for Students, it must commit to genuine student engagement in the style of Imperial College Union and Imperial College London.

21. a. Do you agree with the proposed duties and powers of the Office for Students?

The creation of a regulatory body for higher education that has a statutory duty to promote students' interests is a novel concept, and one that we would like to see explored and detailed further.

While we understand the concerns of Imperial College London and other institutions that a regulatory body must take financial sustainability and academic excellence into account, it is an interesting reframing of the debate to consider such issues through the prism of students' rights and interests. For example, it is hardly against students' interests for institutions to be financially viable and to produce high-quality research.

We also believe that students and their unions are more than capable of engaging with long-term and strategic questions facing institutions, the sector, and the wider economy, and in fact are generators of innovative solutions and ideas at multiple levels. We hope our productive and valued relationship with Imperial College London has demonstrated this - not least in our detailed contributions to the institution's own core strategic plans.

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

Yes, as long as mechanisms are in place for institutions to have meaningful input into the strategy and operations of the Office for Students.

22.

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

We strongly believe it would be fundamentally wrong for the Secretary of State to be empowered to set tuition fee caps without Parliamentary approval.

The whole Green Paper and the rhetoric surrounding higher education from all stakeholders focuses on the economic and social importance of higher education, and the value of widening access and supporting students. Our higher education system is portrayed as an invaluable national asset that is the envy of the world. Tuition fees are of such key importance to the settlement that underpins the sector that it would be a historic mistake and a deeply undemocratic decision to place this power in the hands of one individual rather than Parliament itself.

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

There is not enough information provided to give a meaningful answer to this question.

23. Do you agree with the proposed deregulatory measures?

We do not agree that higher education institutions should be exempt from Freedom of Information legislation. We understand the frustrations experienced by institutions when receiving commercial or vexatious requests, but do not agree that these criticisms are justification for removing a valuable tool for students and the wider public to hold institutions to account. These organisations spend large sums of student and public money, and implement processes that can have a huge impact on the livelihoods and wellbeing of thousands of individuals; the ability to investigate and learn about their practices should not be threatened.

PART D: Reducing complexity and bureaucracy in research funding

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?

We have no comment to offer on this 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 have no comment to offer on this question.

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?

We have no comment to offer on this 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?

We have no comment to offer on this question.

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

We have no comment to offer on this question.

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

We have no comment to offer on this question.

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

We have no comment to offer on this question.

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