



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)
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	Awarding organisation
	Business/Employer
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	Further Education College
	Higher Education Institution
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	Legal representative
	Local Government
	Professional Body
x	Representative Body
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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?

English is a traditional discipline, but also a protean one: it marries deep subject knowledge and tried and tested skills such as close reading with new developments such as Digital

Humanities. It remains a very popular choice at undergraduate level in HEIs across the sector, nationwide. Its student cohort is predominantly female (75 - 80% female). The Green Paper acknowledges that 'information barriers are disproportionately faced by those from lower socio-economic groups, women and ethnic minorities'. Particularly at risk in our discipline are women from lower socio-economic groups, who are more likely to study in their home town (for class and financial reasons) and less likely to have the confidence to apply to the most prestigious institutions (for gender reasons). We would thus be concerned at any proposal that threatened to reduce local provision if current providers were to exit the market. To focus only on ensuring that there are no 'black spots' for STEM subjects in a scenario where a provider also delivering English exits the market would be likely to have a disproportionately negative effect on women, who are concentrated far more in Humanities subjects, especially English.

We believe it to be crucial that any TEF is linked to extremely robust mechanisms for access/ widening participation, and for a commitment to sustain regional provision of English degrees nationwide, matching the commitment to STEM subjects. Failure to do so would have a substantial equality impact on large numbers of less privileged female students. See also comments under question 17.

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

☒ Yes

☐ No

☐ Not sure

Please provide any further relevant evidence.

See above.

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.

We have considerable expertise in defining what an English degree should include and the skills it should nurture. The recent QAA review team of the National English Benchmark Statement was chaired by the then Chair of the English Association Higher Education Committee and included several members of that committee and of University English's executive board (<http://www.qaa.ac.uk/publications/information-and-guidance>). We remain dubious that good teaching can be captured by metrics any more than good research can (see Wilsdon's *The Metric Tide*); if metrics are to be employed we think it imperative that the potential for unintended consequences of their use to be carefully considered. We consider that there is inadequate detail thus far to enable us to reach robust, evidence-based conclusions about how the TEF might work.

We are concerned at the possibility for the TEF to be detrimental to student learning unless its nature and presentation to students and employers are extremely carefully thought-through. There is already anecdotal evidence that students' increasing self-perceptions as consumers of an educational product is having detrimental effects on their learning. Students appear

increasingly to ‘work to the test’ (for instance, in reading only the minimal number of texts necessary for completion of summative assessment); to believe that the lecturer’s role is to give them the right answer – or at least, an answer that they can replicate for a 2-1 grade; and to think that the responsibility for their learning lies principally with the lecturer, rather than also in their own application. This phenomenon may now be more pronounced in the UK than it is, for instance, in the US, where students have always paid for HE. Reasons for this are unclear (cultural memory of a recent time where HE was free for the student? a more instrumentalist approach to non-compulsory education in the UK than is operative in the US?) but crucial to us appears to be the overt emphasis from the Browne report onwards on students as consumers of a market product. There is a real risk that unless TEF assessment categories are very carefully designed to counteract this propensity for students to abdicate responsibility for their own learning (a responsibility fundamentally necessary to good learning at HE level) it will have a detrimental effect on the quality of the ‘product’ – that product not being HE degrees, but the educational attainment of the graduates HE produces (which includes their attitudes to independent work and learning, as well as the skills they acquire).

English may be particularly vulnerable to this danger, because as a discipline which demands a very high volume of reading which must perforce be done independently and alone, its contact hours are necessarily limited. Success in our discipline depends on an inculcation in our students of the capacity for independent study and independent thought, and it is all too easy for students to misunderstand the nature of this independence if they believe that their degrees (rather than their attainment at graduation) are the ‘product’ that they are buying. Similarly, there is a real risk that unless data about, for instance, contact hours is very carefully presented, students (and parents, and employers) will assume that ‘more’ always correlates with ‘better’. This is transparently not the case – an English student who got the same number of contact hours as an Engineering student would not end up with a very good degree, for they would have inadequate time to read the volume of material they need to read. Whilst no contact hours would clearly be very bad, many contact hours is not necessarily an advantage, nor better than fewer. It is the quality of contact hours rather than their number which matters most.

Question 3: Do you agree that the ambition for TEF should be that it is open to all HE providers, all disciplines, all modes of delivery and all levels?

☐ Yes

☐ No

☒ Not sure

Please give reasons for your answers.

We are hesitant here because the level of detail in the Green Paper is insufficient for us to make a judgement. But if the TEF is also to be applied to higher levels, and if it is to be a metrics-based exercise, it is possible that the metrics employed for undergraduate education may not be suitable for application to higher degrees, which demand, for example, increasing amounts of independent study. We would ask for concrete evidence that a metrics-based TEF system is appropriate for postgraduate HE before it is instituted.

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. A very robust Access Agreement should be a prerequisite for a TEF award. We see no case for exempting any type of provider from this pre-requisite; all providers should be bound by the necessity to adhere to the same robustness of access conditions.

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.

The proposal is too accelerated, in the absence of any clear intelligence of what is to form the basis of the assessment. It leaves inadequate time for debate on the indicators of teaching excellence which it is already invoking as evidence for judgement.

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.

The proposal suggests that only 'in time' will panels be convened for each discipline and include experts in that discipline. The implication is that at first, panels will include only 'academic experts in learning and teaching, student representatives and employer/ professional representatives'. We consider that meaningful judgements can be made only by discipline

experts. Panels should be chaired by a discipline expert, and the student representative should be a student studying the discipline being assessed. In our case, for example, it is highly unlikely that an Engineering student would have the capacity to judge provision of an English degree (any more than an English student would be able to judge the quality of provision of a degree in Engineering). Failure to ensure that panels are primarily composed of discipline experts will mean that the process does not have the confidence of the academic community. We would point out that in HE, teaching methods in different disciplines differ at least as widely, and perhaps more widely, than they do in compulsory education, and that criticism of a lack of discipline knowledge among Ofsted inspectors has been articulated in Conservative websites (<http://www.conservativehome.com/localgovernment/2015/11/john-bald-ofsted-inspectors-need-to-be-subject-specialists-to-have-credibility.html>). In the absence of discipline expertise, the problem of credibility will be far more serious at HE level than it is at school level.

We do not agree that the panel should include employer representation. This is not because we do not value employer input; and as evidence of that fact we would emphasise that it was under our instigation that an employer focus group was convened as part of the process of review of the National Benchmark Statement for English, an innovation subsequently adopted, we believe, by Benchmark Statement Review Committees in other disciplines. However, we believe that employer input should come at an earlier stage of the process. Employers have valuable expertise to offer in articulating the skills that they need graduates to possess, but they are highly unlikely to have expertise in assessing the best way to deliver these skills, any more than an academic would have the expertise to pronounce on the quality of the way an employer manages his or her company. In this respect, it would not solve the problem were an employer to be him or her self in possession of a degree in the discipline they assess: content of degrees as well as modes of delivery change over time, and in ways that may be poorly understood by past graduates. The only viable assessors of teaching quality are those themselves currently engaged in the practice of delivering HE in the same or a cognate discipline.

A robust appeals process is necessary.

There is no detail about process, so we cannot answer this question.

**Question 7: How can we minimise any administrative burdens on institutions?
Please provide any evidence relating to the potential administrative costs and
benefits to institutions of the proposals set out in this document.**

We are extremely concerned that the administrative burden of TEF may have the unforeseen consequence of creating a metrics-driven teaching landscape that hobbles innovation and results in university teachers having less time to expend on teaching itself, and on supporting students. However 'light touch' the process is intended to be, the administrative and hence financial costs will be substantial. Metrics may be relatively cheap, but as evidenced elsewhere in our reply to this consultation, they are neither robust, nor credible to the discipline community (and nor are they cost-free). Peer review and case studies may be more credible, but they are far more costly in terms of staff time.

The proposals seem to desire the creation of an HE landscape analogous to that which exists in the US, with far greater fee differentiation and a larger number of private providers in the

market. But one of the characteristics of the US landscape, both for private and for public providers, is that the administrative burdens it sustains are far lower than those already existing in the UK (REF, QAA etc). UK HE already labours under an administrative infrastructure and burdensome audit culture far heavier than that of its US counterpart; if the TEF exacerbates this burden it will make it harder, not easier, to compete with the States both in research productivity and in reputational advantage.

If poorer institutions find it harder to bear the administrative burden of the TEF, this is likely to have a particularly deleterious effect on English. One of the key strengths of our discipline, as evidenced by REF 2014, is the fact that research excellence, both in impact and outputs, was discernable throughout the sector, in many different kinds of HEIs. This is possible for English in a way that it is not for STEM subjects, which characteristically are far more resource-costly than Humanities; in English, moreover, there is an intrinsic relation between research and teaching which is crucial to student satisfaction: the best teaching manages to convince students that they are the co-producers, with their tutors, of new insights and ideas. A time-consuming TEF which made it less possible for academics in less wealthy institutions to be actively engaged in research would be likely to have a detrimental effect on the teaching they provide.

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.

It is hard to answer this question in the absence of knowledge of what the TEF will compare. But discipline-specific assessment must be in place from the outset.

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.

We are of the view that the high percentage of undergraduates stating that they believe that 'their course offers very poor or poor value for money' may indicate not that they are dissatisfied with their course *per se* but that they believe the cost of education in the UK is too high (and clearly, such respondents may not fully understand the nature of university finances). We cannot see that the current proposals – inflation-level increases only – will meet the costs of participation in the exercise. If the ultimate intention is eventually to allow over-inflation fee rises, we believe this to be a threat to our discipline. The benefits of HE – in *inter alia*, health, happiness, and engagement in participatory democracy, all mentioned by Lord Willetts in his recent Radio 4 programmes – are very substantial, but for some decades now these benefits have been understated or ignored in favour of a discourse that expresses the value of HE in purely economic terms. Just as students think (wrongly) that their £9k p.a. is most directly related to the number of contact hours they have, so too they tend to conceive of the value of their degree purely in relation to the salary expectations they might enjoy on completing their

education. We do not know whether students would be willing to pay much more than £9k p.a. for English degrees when the prevailing articulation of the benefits of degree education focus almost exclusively on salary expectations and graduate destinations.

Furthermore, our degrees are relatively cheap to teach, and probably already subsidise the cost of STEM degrees, as may be evidenced by institutions' TRAC returns to HEFCE. In other words, inflation-level fee increases will be of minimal value to institutions; above-inflation fee increases would risk deterring the Humanities students who currently subsidise STEM subjects. Above-inflation increases, moreover, are of no benefit to students, whose interests the Green Paper announces it is championing.

We are unclear as to whether these incentives and disincentives also apply to private providers, but believe that incentives and disincentives must be identical for all types of provider.

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

☐ Yes ☐ No ☐ xNot sure

Please give reasons for your answer.

It is not clear what these terms will denote. But we are anxious that the metrics suggested will inadvertently signal that teaching input alone is sufficient for good student learning, and we would like to see some explicit acknowledgement built into the TEF that student effort and application are extremely important. The TEF should not, intentionally or inadvertently, signal that responsibility for learning lies only (or even, arguably, primarily) with the institution. We would advise a deep rethink of the discourse about education that government has been communicating to students, employers and the public since the Browne Report. Students are not simply consumers of an educational product. They are themselves the product of the financial, emotional and intellectual investment that they, as well as we, put into their own education. What institutions put into that matters greatly, but even within the very best teaching environments, what students themselves must bring to their own education is crucial. Students cannot buy an education in the same way they might buy a packet of pasta, let alone at the quality most of them now expect their 'investment' to earn them – a 2-1, maybe not a Waitrose 1st, but certainly not a Tesco 2-2. We cannot over-emphasise the importance of the TEF countering a 'message' that has been communicated by successive UK governments since Browne. It must signal the importance of student effort and begin to adjust the highly damaging message that student payment means they are simply buying a product. Failure to counteract this message will have deeply damaging and long-term effects on the graduates we produce, and will neither be in their interests, nor in the interests of employers.

Many institutions assume that discipline-specific pedagogical research will be low-rated in REF exercises, and discourage both the production and the REF submission of discipline-specific pedagogical research. We are of the opinion that a teaching/ research divide is highly detrimental to our discipline and would wish to encourage submission of teaching materials to REF. Alternatively, the government might consider inviting such publications as part of TEF submissions.

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.

Considerable doubt on the use of metrics in research has already been articulated in the Wilsdon Report, *The Metric Tide*, and elsewhere there is growing evidence that the use of metrics in, for example, university league tables, merely uphold existing hierarchies (see for example Christopher Newfield's 'Metrics Mania in Higher Education', to be published on University English's website <http://www.universityenglish.ac.uk/> in mid-January). If they are to be employed, metrics should, as the Green Paper acknowledges, be valid, robust, comprehensive, credible and current, but the proposed metrics fail on these criteria.

HMRC-matched and DWP data about graduate outcomes, destinations and benefits are not a proxy for teaching excellence. Graduate salaries are generated by many factors that have nothing to do with the quality of teaching a student has received: for instance, the prestige of a given university in an already highly stratified HE landscape; the gender-pay gap (particularly relevant to English, a subject in which the majority of students tend to be female); the social capital already possessed by more privileged students, especially those attending more privileged institutions. Moreover, earning potential is far higher in the South-East of England than it is in the North or South-West of the country. There is a real risk of further exacerbating the growing North-South and East-West divides if this data is used in isolation, and/or of inadvertently encouraging migration to the South. Utilising this data in isolation will simply reinforce existing hierarchy and inequality, and further entrench existing privilege, both gender and class-based.

Similar observations might be made of retention/ continuation HESA statistics. A privileged young student without dependents will find it much easier to complete his degree than a poor, inner-city single parent (who will be far more likely to attend their 'local' and generally less prestigious, university).

HMRC, DWP and HESA data would only be meaningful if adjusted to take into account data about a university's average student intake by class, race and gender, and adjusted so that the premium afforded by an HEI's current place in the prestige ranks is negated. Use of the data should also take into account the fact that average salaries differ in different regions. Not to do this would be to flout the stated expectation that the metrics should be valid, robust, credible and comprehensive.

Student satisfaction indicators are again a poor proxy for teaching excellence. There is a good deal of evidence to suggest that student satisfaction is higher in particular types of institution. For instance, campus-based institutions typically score much higher than inner city institutions. It is not clear why this is so, but one reason might be that particular types of students tend to choose to study in particular types of institutions.

We are unsure about how the institutional evidence will relate to the discipline specificity of TEF. Issues such as ‘teaching intensity’ (there is inadequate clarity about the meaning of this term) and ‘contact time’ for instance will vary widely within individual institutions as there are matters relating to discipline practices rather than institutional teaching strategies.

We would suggest that case studies of particular disciplinary practices might provide a better indication of pedagogical commitment, philosophy and excellence than metrics-driven exercises, but we would add that the production of such case studies will entail a substantial cost in staff time.

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.

We believe that ensuring good regional provision of a range of degree courses (not just STEM) is crucial to the WP agenda, as disadvantaged students are frequently reluctant to live away from home for financial and other reasons. We doubt that conscious or unconscious discrimination arising from a student’s name is a material factor in admissions (and even were it to exist, such discrimination would not, in any case, affect the cohort with worst participation, i.e. underprivileged white males) but we have no objection to name-blind application, other than that it will have an administrative cost.

- 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.

On the one hand, targets focus institutional minds. On the other, setting targets for the least privileged, most under-represented groups (African-Caribbean and white working-class boys) in the absence of robust consideration of the current over-representation of the most privileged (the privately educated) bears the risk of adversely affecting the prospects of those who are not targeted because they are not at the bottom of the pile, but who still face substantially higher barriers to entry than their most privileged peers. This is a particular risk for English, whose student cohort includes large numbers of lower middle-class, state-school educated, girls.

If universities admitted privately-educated pupils at no more than the percentage that they represent of the school-leaver population, access would look rather different for the majority, including the least privileged. State schools (and a greater range of universities) would become very much better supported by those with material and cultural capital. The fate of the next least-privileged, and non-targeted, students remains troubling if attention is concentrated on just one set of social and economic markers, without regard to the educational inequality currently underpinning the whole system.

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

Part-time and mature students. Women may be disproportionately represented in this cohort.

Question 13:

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

As already mentioned, any metrics regarding, *inter alia*, graduate salaries and university retention rates are meaningless unless contextualised within other data about social class/ race/ gender/ region of employment post degree.

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 expertise to pronounce on the costs of acquiring other data about social class/ race/ gender/ region, but we think that in order to preclude game-playing with data returns such data should be centrally generated by the OfS.

Opening up the sector to new providers (Part B: Chapter 1)

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

☐ Yes

☒ No

☐ Not sure

Please give reasons for your answer, including information quantifying how the potential cost of entry would change as a result of these proposals.

We are deeply concerned about plans to expedite the entry of private providers into the market. The UK has an enviable international reputation and the risks of too precipitately opening this market up to private providers are substantial. This has been evidenced by several recent

private sector scandals, some recently covered in a BBC documentary, others in, for eg, reports from the National Audit Office (<https://www.timeshighereducation.com/news/private-provider-dropout-rates-and-loan-access-laid-bare-by-nao/2017302.article>) who found that the dropout rate for students at private providers accessing student support was 12% in 2012-13, as against 4% for HEFCE-funded institutions, and noted also an alarming rise in the number of for-profits with dropout rates above 20%.

We would point out evidence from other countries, such as Finland, where the success of the school system partly arose from ending private school provision in the 1970s, allowing the system as a whole to operate much better for all. And we would emphasise that, in Howard Hotson's words, until now, 'the UK has somehow managed to maintain top-ranked universities for only about a fifth of the US price' and point out that in the US, the state-funded University of California achieves world-class results for a much lower cost, and with better access, than the Ivy League (see <http://www.lrb.co.uk/v33/n10/howard-hotson/dont-look-to-the-ivy-league>).

We see no reason to think that fear of competition inhibits incumbent providers from validating new degrees: universities already compete for students, and new degrees are validated by employees of competing institutions all the time (see below).

We believe it to be essential that the same conditions regarding, for instance, proportions of staff on permanent contracts, widening participation and access agreements would apply to all providers, irrespective of their public or private status.

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.

UK HE has a global reputation. We have to preserve that reputation, and these proposals threaten it. Only providers with a good track record, sustained over several years, should have DAPs and university title. We should also consider the students whose degrees will lose value if their awarding institutions collapse soon after precipitate award of university title.

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

As we have noted elsewhere in this consultation, universities already operate in an environment in which they are competing for students. Universities are already endlessly instituting new degrees to attract new student cohorts, and endlessly engaging academics from competitor institutions to validate those degrees. Many academics already work with private providers engaged by their own institutions to deliver, for instance, pre-sessional or first year courses for international students. Academics engaged in validations do not fail to validate degrees because they are worried about competition: professional probity and respect for discipline trump market-driven considerations for almost all academics of whom we are aware. The reasons academics do not validate degrees lie in professional worries about the quality of the proposed

provision. It is a travesty that the Green Paper fails to recognise this. Academic judgement, from those already involved in delivering similar or cognate provision, is an essential guarantor of quality, and cannot be devolved to the OfS or other organisations without substantial, and we believe untenable, risk. Attempting to circumvent this professional judgement is perilous in the extreme.

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.

Speeding up entry makes it more likely that inadequate provision will slip through the net, and hence that, eventually, more students will have to depend on the inadequate provisions for provider exit stipulated in the following question, with potentially devastating effect on the reputation of UK HE. Current stipulations appear adequate to us. Substantial track record is an important indicator of quality.

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.

Clearly, students must be protected in the event that their course cannot be completed. They must be able to complete their study in the same geographical location (not to be able to do so might represent indirect discrimination – against single parents, for instance, most of whom tend to be female). This is true for all subjects, not just for STEM subjects, but may be particularly relevant in our discipline, given the predominance of female students in English.

The Green Paper appears to anticipate that in some cases provider exit might be possible without allowing students that possibility (para 2.7: ‘failing that ...’). If this were to happen, tuition fees and maintenance might not be adequate compensation – say, for instance, for a mature student who had resigned prior employment in order to complete a degree. Moreover, the Green Paper specifies rebate for ‘(unspent) prepaid tuition fees’. This location appears to suggest that it is anticipated that all that would be reimbursed in the event of provider failure and inability to place the student in another institution is a proportion of the fees the student has paid. But a student’s tuition fees are an investment in a degree, not in a proportion of it, and a degree is not analogous to, say, rent, where the commodity already paid for has already been consumed. A proportion of degree study is not a useful line on the c.v. In the event of provider failure and inability to place the student elsewhere, all fees and maintenance loans paid

to that date should be reimbursed, not just the ‘unspent’ proportion of them. Furthermore, in such an instance account should also be taken of lost earnings if a student has resigned prior employment to embark on degree study.

We do not understand why an international student’s visa status should be allowed to impede continuity of provision. If a course provider exits the market, an international student’s investment should be protected to the same degree as a home/EU student’s. Lack of such a guarantee to international students that they can complete their degree course would be damaging to international recruitment as well as contrary to natural justice.

Simplifying the higher education architecture (Part C)

Question 18:

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

☐ Yes ☐ No x☒ Not sure

Please give reasons for your answer.

An Office for students could not take over all of HEFCE’s functions, such as its provision, for example, of funding to the Institute of English Studies, which is a key player in the national landscape of English literature. We wonder where PGT and PGR students’ interests will be catered for, and have stated elsewhere in this consultation document our anxieties that separating teaching and research will be detrimental to teaching quality.

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

☐ Fully ☐ Partially x☒ Not at all

The Green Paper argues the virtues of gathering roles under one organisation. If this is the case, it makes no sense then to contract those functions out to separate bodies.

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

See answer to 18 b)

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

Option 1: BIS Ministers set strategic priorities and BIS officials determine formula.

☐ Agree ☐ x 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,

Both of these options appear to counter the GP's claims to provide a framework governed by student interests. Instead, the agenda here appears to be that of manipulating provision in order to counter the market forces generated by student demand. It would seem likely that the net result of an attempt to (for example) limit provision of Humanities places and grow STEM provision would be a net loss in students entering HE. A student who wishes to study English is unlikely to elect to follow a Physics degree if s/he cannot find a place to study English and would be more likely not to go to university at all.

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.

At present, and as articulated, it is hard to see how the TEF could be defined as 'light touch'.

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

This question does not pertain to our remit as a body representing English, but we think that student unions should remain autonomous bodies.

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.

We are not sure that the proposed duties and powers are at present adequately defined.

One of the key strengths of UK HE, especially in our discipline, is the link between teaching and research. We are concerned that the proposed changes may undermine this link, and we think that the failure to include anything about research in the remit of the OfS will communicate, perhaps inadvertently, the message that research is not a matter which concerns students (elsewhere in this response we have attempted to articulate why we think this is not the case). Pitting research against teaching, even inadvertently, will be likely to encourage

students to object to their tutors 'wasting time' on research when they should be teaching – to the detriment of the teaching future students will be likely to receive.

We believe that validation of new courses should be carried out by those directly involved in teaching similar courses, and have no confidence that such roles can be adequately fulfilled by those without direct, recent experience of teaching the programmes they are engaged to validate.

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

☐ Yes ☐ No ☒ Not sure

Please give reasons for your answer.

Question 22:

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

☐ Yes ☐ No ☒ Not sure

Please give reasons for your answer.

It is not adequately clear what these powers are, or how they will be circumscribed in future years.

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.

The proposed deregulatory measures would be likely to have a particularly significant and, in our view, detrimental impact on the Humanities in the post-92 HE sector. Most post-92 institutions are HE Corporations; the proposed deregulation would allow these HECs to

dissolve themselves and transfer their assets to new entities. There is no indication in the Green Paper that these entities would have to be run on a not-for-profit basis. Post-92 universities rely on tuition-fee income for the overwhelming bulk of their revenue, and the proposed regulatory changes would therefore be likely to increase the pressure on these institutions to become ‘teaching-only’ organisations; for reasons outlined earlier in this response, this would have detrimental consequences for both teaching and research in the subject.

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?

We are pleased that the Green Paper reaffirms the Haldane Principle and commitment to Dual Funding support. We would be very concerned at any indication that government wished to take a more active role in setting strategic research priorities and would want the arm’s length status of the Research Councils to be preserved. We would want to ensure that dual funding streams and their distinctive characteristics would not be changed were they to be operated within a single organisation; we would prefer that separate organisations operated these streams in order better to ensure preservation of those characteristics. We reiterate our concern about the potential separation of teaching and research under the new regime.

Question 25:

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

In the event that dual funding were operated within a single institution, total transparency about relative amounts of both types of funding should be published in advance of the new structure being instituted, in order to ensure that QR funding distribution is not transferred into Research Council budgets.

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

See above

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?

Unlike STEM subjects, English is a discipline that for the most part needs time more than expensive kit and facilities. For this reason, QR money is particularly important to us. That

REF 2014 indicated that excellent impact and outputs were observable throughout the sector was a matter for celebration, optimism and pride in our discipline community. As already noted, the extensive reach of research excellence has a symbiotic relationship with teaching quality: academics are invested in the research questions they introduce to students because they themselves 'own' those ideas and play a role in their production. QR is essential to this process for us, to a far higher degree than it is for Health and the Natural Sciences. It nurtures curiosity-driven, blue-skies research and allows individual academics to produce the outputs that enhance their career mobility, sometimes from institutions relatively low down university league tables to those which enjoy the highest of rankings. It thus directly contributes to the UK's international research reputation: some of our best research emanates from less prestigious as well as the most prestigious institutions. Furthermore, it has been a crucial mechanism through which the broader impact of Humanities work can be articulated and communicated to a wider public.

QR is fundamentally important to the Humanities; REF may not be the ideal way to distribute it, but no credible alternative has yet been produced. It has the broad confidence of those both within and outside institutions as a means of distributing public monies, and it is relatively cost-effective.

Peer-review is indispensable to research assessment processes in our discipline.

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

Institutions begin preparing for the next REF as soon as the submissions are entered for the preceding one. Weeks or even months of staff time are devoted to strategising and auditing, way before the rules and guidelines of the next exercise are published. Much earlier publication of REF rules and guidelines would help here, so that institutions can be more focussed in their strategies from the outset, rather than second-guessing all the time what the stipulations will be.

One consequence of REF emphases on external grant income is the pressure exerted by institutions on academics to apply for grants that only very few can secure; we are not convinced that this is always the best use of academic time.

Peer-review, though time-consuming, remains central to Humanities quality assessment and has the confidence of our discipline community much more than metrics do.

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

We do not think metrics are useful to the assessment of quality in the Humanities. Moreover, there is a great deal of evidence emerging to suggest that certain kinds of metrics are gender-biased (see for example: http://sciencecareers.sciencemag.org/career_magazine/previous_issues/articles/2015_09_03/caredit.a1500217)

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

Please use this space for any general comments that you may have, comments on the layout of this consultation would also be welcomed.

Thank you for your views on this consultation.

Thank you for taking the time to let us have your views. We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply 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