

University of Stirling response to UK Government Green Paper: Fulfilling our potential: teaching excellence, social mobility and student choice

Introduction

The University of Stirling welcomes the opportunity to respond to the UK Government's consultation on the future of the UK higher education system. The UK HE system is internationally recognised and acclaimed for excellence in learning and teaching and research. It has been noted that, internationally, the UK HE sector is viewed as one and that international students, employers and universities do not identify the devolved education sectors as distinct. Therefore, as a key player in this broad sector the University of Stirling encourages the government to ensure devolved administrations, funding councils and institutions are consulted on and involved in the implementation of changes which will have direct and indirect impacts across all nations of the United Kingdom. The University of Stirling endorses the Universities Scotland response to this consultation.

Teaching Excellence Framework

The implementation of a Teaching Excellence Framework (TEF) in England will have consequences across the devolved nations through the influence of student and employer perceptions. It is imperative, therefore, that representatives of the devolved sectors are involved in future consultations and implementation groups for the Teaching Excellence Framework.

The University of Stirling is committed to excellent teaching and the delivery of an excellent student learning experiences, however, the University is concerned that there are a number of potential unintended consequences and risks from the TEF as proposed:

- Minimal benefit for prospective students and employers: the proposed Teaching Excellence Framework proposes a simplistic review of existing data which do not closely relate to 'teaching excellence' and could distort student and employer understandings of the experiences at higher education institutions. As the data proposed is already publicly available there is negligible additional value to students or employers in collating this into a TEF judgement.
- Diminished value of existing data by distorting purpose: the various measures proposed (including National Student Survey and Destination of Leavers in Higher Education survey) are useful tools which are currently heavily used by universities to review and enhance their performance and by prospective students to evaluate their options; they do not, however, currently purport to measure an institution's 'teaching excellence'. Altering their purpose from that originally envisaged may diminish their value in driving enhancements to the student learning experience.
- Reduced widening participation: the proposed measures for the TEF (particularly in relation to retention and completion rates and graduate employment) are influenced by factors external to the university's control (e.g. social capital, local economy) and the impact of this could be to disincentivise institutions from recruiting students from a widening access background.

- Increased bureaucracy: the Green Paper indicates that one of the driving factors of the Teaching Excellence Framework (and of the HEFCE-led review of quality assessment) is to reduce bureaucracy. This principle is supported by the University, however, real concerns exist that the proposed TEF mechanisms – particularly once the TEF is carried out at discipline-level – will significantly increase administrative burden and regulation. The introduction of a burdensome assessment process would be a regressive step and is strongly resisted.

The Scottish model of quality assessment, the Enhancement-led Institutional Review delivered by Quality Assurance Agency Scotland (QAAS), robustly reviews Scottish HE institutions for quality assurance and quality enhancement and makes explicit judgements on academic standards and the quality of the student learning experience. The latter judgment is comparable with a recognition of 'teaching excellence', as proposed in the Green Paper. However, the ELIR judgements are reached following review of qualitative and quantitative data, analysis of narrative and through engagement with the institutions (including staff and students). Crucially these judgements are made in the context of the institutions' vision and mission. The University of Stirling considers this to be a more effective method for identifying and recognising teaching excellence.

The University encourages the Government to ensure that, following the implementation of a Teaching Excellence Framework in England, there remains a degree of comparability between the outcomes of the quality systems in place in the devolved nations of the United Kingdom.

Social Mobility and widening participation

The University of Stirling to support social mobility and widening access to higher education; this remains a core aim of our Strategic Plan. The University shares the Government's commitment 'that anyone with the talent and potential should be able to benefit from higher education.' The University sets stretching targets for widening access, agreed in partnership with the Scottish Funding Council, and would advocate this model rather than the unilateral power suggested for the Office for Students in the Green Paper; this approach would undermine institutional autonomy and risk tokenising widening access.

The University welcomes the identification of 'high quality data' as a crucial underpinning factor for measuring, targeting activity and driving widening participation and social mobility. This is in line with representations the University has made to the Scottish Government, the Scottish Commission on Widening Access and the UK Performance Indicator Steering Group. In a Scottish context, this includes adopting a more sophisticated measure for widening access than the Scottish Index of Multiple Deprivation.

The University does not consider that a greater use of data requires the actions outlined in the Green Paper – namely, increased legislative requirements to publish data. It is considered that far greater value could be extracted from existing data sets by greater partnership across government and sector agencies to align data sets and support effective progress tracking. The University strongly supports the introduction of a Unique Learner Number in Scotland, preferably compatible across the UK, which captures student data from primary school through all levels of education, which would allow for greater value to be obtained from existing data sets through, for example, trend analysis.

The introduction of a unique learner number would also allow for the introduction of names-blind admissions processes, which the University supports in principle, without removing the

ability for institutions to identify students on application who have, for example, taken part in widening access or outreach activities. This process supports the use of contextualised admissions which delivers a nuanced and sophisticated approach to widening access and supporting student success and should be preserved.

The adoption of a broader focus for widening participation, for improved data analysis and for names-blind applications are supported in principle by the University of Stirling, however it is crucial that autonomous institutions are encouraged to widen participation in line with their particular vision and mission, their suite of academic disciplines and an acknowledgement of local and national demographics. Any targets should be benchmarked and contextualised, and mutually agreed, not imposed, between the institution and the relevant funding body,

Opening up the sector to new providers

There are two principles which must be adhered to if the sector is to be opened up to new providers:

- The integrity of university title and the protection of the reputation of UK HE
- Protection for students

The University of Stirling supports a high bar for provider entry to the UK HE sector and demonstration of a proven track-record developed over a number of years before an organisation can be permitted to seek university title. The high bar for entry will protect the sector against regular exit of providers from the sector which could destabilise the sector and would put the quality of the student experience at risk. In international perceptions, informed by international benchmarking such as the International Student Barometer, this would impact on the reputation of established, high quality providers across all the devolved UK nations.

The University does not, therefore, support the proposals on this matter in the Green Paper.

Simplifying the higher education architecture

The UK HE system is supported and enhanced by the provision of a coherent, UK-wide infrastructure and architecture which has evolved to recognise and reward diversity across the devolved nations. The existing architecture has allowed the devolved nations to pursue distinct policies pursuant to their requirements while maintaining a comparability across the United Kingdom which underpins the international reputation of excellence enjoyed by the UK HE sector. It is crucial to the ongoing validity of the sector that this coherence and comparability is protected.

There are a number of key organisations and partnerships which exist across the UK which facilitate this and ease the establishment of cross-border teaching and research partnerships which ultimately benefit students, universities and society.

The University of Stirling supports the maintenance of agencies such as the Quality Assurance Agency and the Higher Education Statistics Agency as UK-wide organisations

independent of the Office for Students. Their independence from government and national funding councils support institutional autonomy - which is linked to our international excellence - and facilitates UK-wide comparability.

The Green Paper proposes deregulatory measures in relation to freedom of information and the role of the Privy Council. The University of Stirling supports the lifting of bureaucratic regulation on universities to support a responsive, modern and efficient sector on a level playing field and welcomes the Government's stated objective that 'all higher education providers subject to the same requirements'. It is noted that the proposals in the Green Paper would have cross-UK implications but are governed by distinct legislation in Scotland. We therefore encourage Government to enter into dialogue with the devolved administrations to ensure the steps taken to deregulate the sector in England meet the principled intentions of simplifying the higher education architecture rather than creating counter-productive perverse cross-border complexities and inconsistencies.

Reducing complexity and bureaucracy in research funding

In principle, the University welcomes the opportunity to reduce complexity and bureaucracy in research funding. It is crucial that the desire to reduce complexity or to simplify processes does not, however, diminish support for excellent research across all nations of the UK or negatively affect the reputation of research excellence of the UK HE sector internationally. The University welcomes the commitments to these principles in the Green Paper and encourages the Government to follow through with these commitments in the subsequent legislation and in their actions.

It is essential that the research infrastructure continues to support distinctive policy approaches across the devolved nations while maintaining the strength of a unified UK HE research sector. The Green Paper does not adequately recognise the impact of the proposed changes to the research infrastructure on the devolved nations. The Government should make commitments to ensuring adequate representation of Scottish HE institutions and the Scottish Funding Council in determining the future of the research infrastructure and subsequently on decision-making bodies of UK-wide bodies (such as the proposed Research UK).

The University considers the maintenance of a dual-support system as critical to the continued success of higher education research; the balance between specific project funding and funding based on evidenced excellence to encourage ground-breaking innovative research is a key driver for our world-leading research.

The University notes the ongoing Research Excellence Framework (REF) Review and considers that the mechanisms and method of the REF should be examined in full by the review group and that this Government consultation should not seek to usurp or pre-judge the outcome of this review. The REF review should build on the experience and expertise developed in the national funding councils and from professional research managers within institutions (for example through the Association of Research Managers and Administrators (ARMA)) with evidence of what drives research performance improvement and through consultation with academic leaders.

In principle, the University of Stirling strongly believes the UK-wide infrastructure should continue to support a Research Excellence Framework exercise, which is an internationally recognised indicator of quality. The REF should maintain a UK-wide assessment of research and retain the distinctive approaches to allocating the funds within devolved nations pursuant to devolved administrations' requirements.

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15 January 2016