



Department for Business, Innovation & Skills

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

You can reply to this consultation online at:

<https://bisgovuk.citizenspace.com/he/fulfilling-our-potential>

A copy of this response form is available at:

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

The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

The closing date for this consultation is 15/01/2016

Name:	Professor Andrew JT George, Deputy Vice Chancellor (Education & International)
Organisation (if applicable):	Brunel University London
Address:	Kingston Lane, Uxbridge, UB83PH
Email Address:	andrew.george@brunel.ac.uk

Please return completed forms to:

Alison Haines
Higher Education Directorate
Department for Business, Innovation and Skills
Level 1, 2 St Paul's Place
125 Norfolk Street
Sheffield
S1 2FJ

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

Please tick the box that best describes you as a respondent to this consultation.

	Alternative higher education provider (with designated courses)
	Alternative higher education provider (no designated courses)
	Awarding organisation
	Business/Employer
	Central government
	Charity or social enterprise
	Further Education College
x	Higher Education Institution
	Individual (Please describe any particular relevant interest; parent, student, teaching staff etc.)
	Legal representative
	Local Government
	Professional Body
	Representative Body
	Research Council
	Trade union or staff association
	Other (please describe)

Executive Summary

1. Brunel University London is a world-class university based in Uxbridge, West London, and was established in 1966. Our mission has always been to combine academic rigour in our education and research with the practical, entrepreneurial and imaginative approach pioneered by our namesake Isambard Kingdom Brunel. We are proud of the diversity of our student body reflects that of society, both in terms of ethnicity (37% white, 27% Asian and 14% black), gender, disability and groups under-represented in HE. We have a global reach, ranking 35th in the Times Higher Education (THE) worldwide table of international universities, as a result both of the international nature of our students and staff and our research and business collaborations with other countries. In REF 2014 Brunel university London was ranked 33rd among the UK's universities for research power and in April 2015 rose to 25th place in the THE worldwide ranking of the top 100 universities under 50 years old, placing Brunel 3rd among universities in the United Kingdom. Our Vision is: "To be a world-class creative community that is inspired to work, think and learn together to meet the challenges of the future".

Teaching Excellence Framework

2. We welcome the concept of introducing a TEF but are mindful that the implementation is key to its success. The TEF has potential for great benefit in terms of further improving teaching quality but also for inadvertent harm due to perverse drivers and other unintended consequences. It will also result in a more marketised model of higher education. We are concerned that there is too great a focus on teaching and not enough importance put on learning or education (we would support the terms Learning and Teaching Excellence Framework or Education Excellence Framework), the higher intellectual skills a student develops or indeed on the wider educational offering of a university provides in terms of the non-academic opportunities to widen students personal development.
3. Whilst we support the idea of a framework for an excellent education and learning experience for students, we do not support the proposed link between TEF performance and fee setting. Once fully validated the TEF could however be used to give a threshold kite mark for good performance. Furthermore, caution is strongly advised when using TEF levels 2, 3, and 4 to inform students and employers unless it can give a fuller picture of the education provided. There will be a loss of focus on the individual's learning outcomes, as opposed to that of the cohort. It may also reinforce and perpetuate inequalities of opportunity.
4. All stakeholders (students, teachers, parents, employers, funders etc.) need to be convinced of the validity of the metrics used and if the TEF is to succeed, it will take time to get it right. We support the initial link of TEF to QAA outcome, but there will subsequently need to be well designed pilot studies to test the validity of the metrics used otherwise the scores and league tables which are informed by them could be grossly misleading to students, teachers, parents, employers and other stakeholders.

5. We welcome the proposals around social mobility, particularly the link to outcomes.

The Higher Education sector

6. New providers should be welcomed, but only if the quality is high. Any lowering of standards for either entry or degree awarding powers will impact on students and damage the excellent reputation of our world-leading sector.

Simplifying the Higher Education architecture

7. The creation of an Office for Students may increase the focus on students, but the name may detract from its broader remit as a regulator. It is essential from a sustainability perspective that the regulator has oversight of the sector and member institutions as a whole. It is also very important that universities retain their autonomy and that their regulation is at arm's length from government. Thus, we propose that the regulator be called the Office for Learning and Education with a mandate that includes both teaching and research and the associated government funding attributed to those activities.

Reducing complexity and bureaucracy in research funding

8. We do not support the proposed transfer of QR and REF to the research councils/RUK. Research and education are intimately entwined with one another and, together, are the *raison d'être* of universities. The proposal to separate them will create an artificial divide which will be highly damaging to the sector and its world leading international reputation.

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?
 - i. As outlined elsewhere in our response, many of the proposals could benefit equality. However, there is a strong risk that inappropriate implementation of the proposals will result in perpetuating or enhancing inequalities in outcome for people with protected characteristics.
 - ii. We note that, not all protected characteristic groups are considered. We believe that there has to be consideration of the equality impact of the proposals on staff as well as students. It will be important to monitor the impact of these proposals on the applications, acceptance and enrolment of students with protected characteristics at different universities.

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

☒ Yes

☐ No

☐ Not sure

Please provide any further relevant evidence.

- i. Yes. The plans and proposals appear to assume that individuals with protected characteristics are either 'women/men', or 'BME', or 'disabled' or other, etc. What has not been considered is the equality impact of intersectionality, that is people are 'women/men' and 'BME' and 'disabled' and other etc. Within our widening participation agenda it would not be unusual for students to have multiple protected characteristics and it is the collective interactions of these that accumulate impacts of inequality that disadvantage them when compared with their peers. As detailed later in the response, there may be discipline-specific elements that should be considered. For example, the Women in Engineering programme at Brunel (Q 12c).

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.

- i. There is currently a lot of information available to potential students and employers about programmes (including KIS and league tables). However, these data can be difficult to access and understand. It could be argued that disadvantaged groups would benefit most from help in navigating and understanding the wealth of data.
- ii. We need to spend more time understanding what data prospective students and employers use (or would want to use) to make decisions. This is likely to be nuanced, and cannot be reduced to a single parameter or measurement. For example, different employers are looking for different things – some will emphasise technical competence and others will need softer skills. Students make choices dependent on location, nature of the programme, reputation and facilities – but each individual will weight these differently.
- iii. There is therefore a danger that a single 'TEF score' will simply substitute for the current system in which reputation (largely gained through historical research activity or self-reinforcing prejudice) is the main measure available to students and employers. A more nuanced TEF in which different aspects of the institutions educational provision would give richer and more valuable information.
- iv. It is vital that the information that employers have do not reinforce current inequalities. At present many employers use league tables inappropriately to decide what universities they will recruit from. This means that students from a disadvantaged background are likely to be discriminated against, as they are less likely to attend those universities. The data available to employers needs to emphasise the actual educational achievement of students (including extracurricular achievements) – rather than proxy data such as employability and ranking/mission group which will set up self-perpetuating hierarchies only loosely related to the educational provision.
- v. Finally it has to be remembered that the metrics measure the performance or experience of the population, but not of the individual. Employers need to have access to information about the individual that succinctly and accurately indicates what they have achieved. Anecdotal feedback suggests that employers do not use the HEAR as much as they could. Further work should be done by the sector, in collaboration with business, to understand how to provide that information in an accessible and useful manner. Many universities are developing additional awards that allow their students to demonstrate what they have achieved (including in extra and co-curricular studies), and it may be helpful to work across the sector to develop common standards and approaches so that employers can more easily recognise and value these.

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.

- i. For reasons of equity and transparency the TEF should be open to all HE providers at all levels. The exception should be PGR which is very different from UG and PGT, where success is most dependent on the relationship and interaction between the student and their supervisory team.
- ii. However, this requires the TEF to take account of the heterogeneity in institutions and disciplines. What good education looks like will be very different in a musical conservatoire or in an engineering department. The nature of the metrics that can be used are different (for example graduates from creative subjects, often show low levels of graduate level employment 6 months after graduation, because they are doing 'low level jobs' to support themselves while they develop their artistic careers). The metrics must be contextualised in order to obtain a full picture of the quality of education.
- iii. We endorse the inclusion of PGT in TEF. PGT is an important aspect of university provision, providing students with the higher level skills required by business. At present fees are unregulated at PGT level. Given the complexity of PGT provision, which can be far more intensive than UG, it would not be appropriate for the fee restrictions to be applied to PGT courses. For example, some PGT programmes will involve spending extended periods carrying out research within high technology and clinical settings, with continual access to research staff, which will cost far more than £9000 to provide. These intensive programmes train the next generation of scientists, healthcare professionals and engineers for academia, healthcare and industry.

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?

- i. An approved access agreement should form part of the TEF, as the ability of the institution to promote social mobility is an important (and welcome) part of government's expectations. In the long term all institutions should demonstrate how they are promoting social mobility as part of their TEF assessment. Strong performance in this area should be one factor that strengthens the TEF award for an institution (and vice versa).

Question 5: Do you agree with the proposals on:

a) what would constitute a 'successful' QA review

☒ Yes ☐ No ☐ Not sure

1. We agree with what should constitute a successful QA review. We suggest that if a provider was unsuccessful in a QA review and fell into the 'pending category' it should be given a reasonable period of time to resolve the issues identified by the QA review before having to decrease their fees.

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

☒ Yes ☐ No ☐ Not sure

- i. We agree with the incentives, though recommend that any increase in student numbers should be controlled, as new providers may not be able to maintain quality if there is a rapid expansion of either numbers or the nature of provision.

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

☐ Yes ☒ No ☐ Not sure

Please give reasons for your answer.

- i. We believe that the move to a differentiated TEF in Year 2 would be premature. It is clear that the proposed metrics are not fully fit for purpose and that further work is required to develop and validate appropriate metrics and methodologies. It would be impossible for the sector, students or employers to have confidence in a system that is not fully developed yet seeks to differentiate universities with 4 levels of TEF award. The sector should learn from REF – whilst starting as a pilot the REF has now developed into a powerful and broadly trusted system.
- ii. As indicated previously, there is a danger that if the TEF award is given as a single value or dimension it will end up perpetuating current inequalities and impacting on social mobility. As discussed, there are many different criteria used by employers and students when looking at universities. Each will weight these differently. It may be more useful, over time, to develop the TEF 3-4 dimensions that are measured (e.g. education in academic discipline, employability, social mobility, facilities). A more nuanced TEF will allow individuals to make more informed choices. It will also allow the TEF outcome to reflect appropriately the mission and nature of each individual university.
- iii. In the longer term as TEF develops it would be better if it operated on a continuous, rather than discontinuous, scale(s). The reasons for this mirror some of the arguments within the Green paper on the use of GPA rather than degree classifications. It provides encouragement for continual improvement. It also removes the 'cliffs' where small differences in award can have a big effect on the outcome. This is a lesson learned when the RAE evolved from a discontinuous to a continuous scale. It would also reduce the impact on the perception of overseas markets as to the quality of UK HE sector.

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

Timing?

☐ Yes ☒ No ☐ Not sure

- i. We agree that the timing of stage 1 is appropriate. As outlined in our answer to Q5 we are concerned that a rapid implementation of stage 2 will run the risk that the whole exercise will be discredited in the eyes of key stakeholders (students, parents, teachers and business) and the sector as a result of inappropriate measures and processes. For the same reasons it could also be damaging to the excellent international reputation of UK HE as international applicants, governments, overseas funders and overseas businesses will be unaware of the

limitations of the rapidly implemented stages. There is a high risk that the excellent UK global brand will be put at risk, as opposed to strengthening it.

Assessment panels?

☒ Yes ☐ No ☐ Not sure

- i. We agree in general with the formation of the assessment panels. However, we have the following comments to strengthen them:
- ii. The panels should contain experts in learning and teaching.
- iii. It is vital that there are mechanisms (special panels or joint panels) that can provide judgements on interdisciplinary programmes. In response to demand from employers and prospective students more universities are starting such programmes (for example; liberal arts, joint programmes with academic and professional elements). There is a perception that the RAE/REF discipline-focussed panels did not favour interdisciplinary work, and it is absolutely vital that there are panels with the expertise and understanding to assess this important and growing form of education.
- iv. Disciplinary (and inter/cross disciplinary) panels are necessary but not sufficient to assess the educational offering of a university. Much of the educational offering happens outside the academic departments. At Brunel we enhance the employability of our students with a Professional Development Centre. We support the students learning (and the staff's teaching) through the Brunel Educational Excellence Centre. We provide learning and teaching resources through the library and the learning technology team. We support the learning of students with disability through the Dyslexia and Disability services. We increase social mobility by preparing our students for university through outreach activities (including Urban Scholars <http://www.brunel.ac.uk/cbass/education/research/bace/urban> and Headstart programmes <http://www.brunel.ac.uk/services/head-start>). These are an example of some of the University-wide provision that enhances the education of our students. The current focus on discipline panels would fail to capture these activities (or would capture them inefficiently multiple times). If the TEF did not reflect these aspects of the education then it would not reflect the full nature of our offering. It would also run the risk that universities would not invest in these vital aspects of their work.
- v. We would therefore reiterate our suggestion that the TEF should be multi-dimensional, and that there should be institution wide panel(s) that look at the employability, the wider support for learning, social mobility and support of those with difficulties.

and process?

☐ Yes ☒ No ☐ Not sure

Please give reasons for your answer.

- i. The TEF as proposed will involve a considerable amount of work for the panels and for Universities. It would therefore be more efficient to have a window for applications on an annual basis. The timing of the panel meetings and decisions will need to fit in with the cycle of fee setting for future years.

- ii. We have already commented on the membership of the panel.
- iii. As the decisions of the panels will have consequences for the institution and for the department, there will need to be an appeals process. There may be challenges around equality issues if it can be shown that the metrics used inadvertently disadvantage one group or the other.
- iv. While the highest quality of review would mean that the panels would have the opportunity to visit the university, so they can meet students and judge the reality of the provision, this would be prohibitively time consuming and expensive for the panels. It may be useful for TEF panels to visit the university in certain limited circumstances. These could include new providers (or old providers moving into new areas) where the track record may not be there.
- v. Accreditation by Professional Statutory and Regulatory Bodies (PSRBs) is an important aspect of quality assurance in most universities. At Brunel the majority of our UG programmes are accredited as too are many of our PGT programmes. This is a powerful way of demonstrating that these programmes cover the necessary curriculum, that they are of an appropriate standard and that they are relevant to the appropriate business/industry. We would strongly support a role for PSRBs into the TEF system. Indeed, if common standards and practices could be agreed then they might help constitute the discipline specific TEF panel. At the very least then accreditation by the relevant PSRB should be useful evidence for a TEF panel. Failure to join up the TEF process with accreditation runs the risk of duplication and inconsistency, resulting in inefficiency and confusion for students and other stakeholders.

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.

- i. There is a lot we can learn from the evolution of the REF, notably, now that the REF process has sector support and is used in internal management processes to help individual HEIs drive up performance, the burden is reduced as it becomes part of everyday practice. This has been achieved by the use of sector supported, robust metrics, many of which are already in the public domain. The introduction of the impact case studies in the last REF was a huge administrative burden as it was introduced late in the cycle. However, now Institutions are evaluating impact as the research is conducted the burden is significantly reduced.
- ii. The “REF Accountability Review: Costs, benefits and burden” (<http://www.hefce.ac.uk/pubs/rereports/Year/2015/refreviewcosts/Title,104406,en.html>) reports summary of costs of the process to sector. We also expand on this in our response to Question q27. It is important to note however that the cost and the burden should be spread across the 6 year cycle. A similar approach could be undertaken to extrapolate the findings to the proposed TEF process.
- iii. Lessons learnt from the REF include:
 - Ensure the use of real and useful measures and metrics; that is the use of both internal (and external) metrics that HEIs regularly use for driving continual improvement of teaching.
 - Pilots and regular reviews of the process, metrics and rewards to ensure confidence in the sector and with stakeholders

- As far as possible TEF should be folded into other data requests such as access agreements and reports.
 - The length of validity of a TEF review outcome (i.e.: Frequency of TEF) will in part influence the burden. Both 3 and 5 year cycles have been mentioned. 5 years would be less burdensome, but potentially less robust than 3. A risk based approach to re-evaluation could reduce the burden with new providers in the market requiring closer and more frequent TEF than their more established counterparts. HEI's previously awarded a TEF level 4 may require less frequent scrutiny than those holding TEF level 1.
 - Sector support and confidence and the use of robust valid metrics in a peer reviewed context are key. The more useful the TEF, the lower the (perceived) burden.
- iv. Using the assumption that 150 universities (and further new providers) will apply over a 5 year period to the TEF, that 15 panels are needed to review a university, that each panel has 10 people on it, and that they spend a minimum of 4 hours for each application (in reading and discussion), then the rough time commitment (neglecting administration) would be 18000 hours/annum. If each hour of an academic costs £50 then the total costs are £900 000 pa. These are conservative costings, and do not take into account administration. However they suggest that the costs of running TEF for the panels are not unreasonable.
- v. From a university perspective, assuming that it takes 4 people-months to prepare for each panel and that there are 15 panels, that would equate to 60 people months to prepare for TEF, which would be a cost of around £350 000. This would need to be set against the increase in income as a result of a successful TEF application, which if we assume 2% inflation and 8000 UG students would be £1 440 000 pa. Therefore, the cost of a TEF application would be approximately 24% of the income obtained from one year of fee increase.

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.

- i. We agree that for the TEF to be meaningful, differentiation at discipline level is required. However, it is important to highlight that differentiation must also encompass the central university educational activities, not just academic disciplines.
- ii. We do not support the 4 stages of differentiation within TEF. A lot more work on this area is required which we hope the technical consultation will enable. Furthermore, we do not support the link of TEF levels to increases in fee, and do not support the concept that such a link would incentivise good practice.
- iii. We believe the TEF has the potential to provide a valuable opportunity to celebrate and highlight learning and teaching excellence in a similar manner to the impact statements within REF. Some thought should be given to the way in which this could be achieved. For example, universities should be able to describe how they have impacted on society as a result of their educational activities, both in terms of the achievement of their alumni and the opportunities that they have afforded individuals from disadvantaged groups. These 'impact studies' might describe how the university has enabled individuals to succeed (for example, at Brunel we might highlight recent graduates who have used work that they developed as part of their degree programme to found new businesses and win prestigious

awards), or they may describe the success that the university has had in narrowing the attainment gap between different groups of students. It would be important to focus on the outcomes of the education, providing evidence of impact.

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.

- i. We strongly disagree with the direct linkage of TEF to fee levels. The logic of the linkage is that success will be rewarded, and that institutions that demonstrate teaching excellence will be able to increase their fees, and attract good students from around the country. Those institutions that are not able to increase their fees will, in time, not be able to offer as good a quality education and so will be in danger of a downward spiral. In a totally free market one could see this as a mechanism of self-correction. However, education is not a totally free market. Many students from disadvantaged backgrounds are limited in their university choice (whether by perception or location; it is evident that students from disadvantaged backgrounds do not travel to the same extent for higher education. For example, in 2015/16 45% of our students from the lower 2 quintiles of POLAR3 came from the local postcode regions, compared to 20% of other students.). Therefore there is a danger that the linkage of fees to TEF, by perpetuating and exaggerating the current inequalities in the system, will reduce social mobility in Higher Education. We would suggest that reputation is a far greater motivation for universities than fees. However, in the longer term both fee and reputation will perpetuate inequalities.
- ii. Any increases in fee must take into account the cost of delivering certain programmes, including many STEM subjects. A university that was unable to raise fees would find it particularly hard to continue to deliver high quality STEM teaching, resulting in further inequalities or a reduction in provision in these subjects.

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

☒ Yes ☐ No ☐ Not sure

Please give reasons for your answer.

- i. In general terms we agree with the focus. However, the concentration on 'teaching' throughout the Green paper is unfortunate. Students attend university to obtain an education. They do this as a result of the teaching by staff, of other educational provision and of the learning that they undertake. For a university education to be successful the graduates must have developed as independent learners who can take advantage of the teaching provided to develop higher intellectual skills. This can mean that the lecturers have, at times, to stop explicit teaching and facilitate learning in order to move students into independent study. This does not mean that quality of teaching is not important, it is vital. But it is part of the jigsaw that makes up the educational experience of students.

- ii. As discussed before the education is not restricted to educational provision in the academic departments, but across the university. In addition there are other parts of the educational offering that are important and cannot be encapsulated in 'teaching'. For example, at Brunel, we have a strong focus on engagement with business. We develop many opportunities for students to interact with relevant business, where they receive invaluable advice, knowledge and feedback. Furthermore many of our students work with business, in a work placement or through an industry funded project. This is part of the mission of Brunel, and would need to form part of any TEF evaluation of Brunel. However, this degree of engagement with business is not appropriate for every type of institution or every programme of study.
- iii. It is important when looking at student outcomes to see that a university education provides positive outcomes that are greater than just employment at 6 months. When successful, a university education gives the graduate skills and attitudes that enhance their success throughout their career (including the ability to adapt to and help shape rapidly changing environments), and it provides societal advantages in graduates who will be positive influences in their society. A narrow definition of student outcomes will impoverish our nation.
- iv. Supporting evidence for the above can be found in "Employability Degrees of Value, HEPI" December 10th 2015 and supported by Nick Hillman, Director of the Higher Education Policy Institute (HEPI), who said: 'Going to university is about more than the jobs graduates secure afterwards. Graduate employment is about finding work, but graduate employability is about securing a fulfilling career in which you can progress and use your talents to the max'

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.

- i. We believe that the assessment of quality should be made by peer review, informed by data including a set of common metrics, additional specific data provided by the institution that supports its specific mission and by a narrative that puts the data in context.
- ii. We would support input from the university students in the submission for TEF. In the longer term we would look to using data from employers to provide evidence as to the way in which students are prepared for the place of work.
- iii. The current proposed metrics have disadvantages in terms of their reliability, ability in some cases to be 'gamed' and the incomplete way in which they encapsulate the education of university students. While they can form an important part of the evidence used for peer review, they cannot used in isolation to make a judgement.
- iv. In the longer term we would welcome the current work on developing surveys that look at student engagement and learning gain. We would also support data that looked at the attainment gap between different cohorts, as a hallmark of a good education would be one that minimised the attainment gap.

- v. As indicated earlier we would wish accreditation by a PSRB to be included in TEF evaluation and for PSRBs to inform TEF, avoiding duplication of review. At present the PSRB can act in a similar manner to the proposed TEF panel, looking at data, information provided by the institute and questioning staff and students.
- vi. The use of metrics to inform research assessment and management has been evaluated and published. The outcomes and recommendations from the “Independent Review of the Role of Metrics in Research Assessment and Management” can be found at: <http://www.hefce.ac.uk/pubs/rereports/Year/2015/metrictide/>. The review was published in 2015 and recommended institutions should sign up to the Declaration on Research Assessment (DORA).

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.

- i. We would recommend not only that the data are stratified, but that specific data is provided with respect to any attainment gap. We welcome the focus on progression, as well as the UUK task force that will look at this. We have responded to the review on name blind application. It is important that universities retain the ability to respond to issues faced by students from disadvantaged backgrounds or under-represented groups. For example we need to be able to assess the comparative academic achievements of students from different backgrounds.
- 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.

- i. This would compromise the independence of the institution and interfere with internal strategic priority setting. Moreover, it is likely to be counter-productive for the targets to be set by the Office for Students. Social mobility is a complex issue and it is influenced by factors that are bound to vary from institution to institution. The institutions are best placed to set the targets based on their own knowledge and experience of the effectiveness of strategies in this area. It is not clear how the Office for Students could obtain the same level of understanding and knowledge.
- ii. We would favour social mobility forming part of the criteria for TEF so that the TEF evaluation would include how well an institution has performed against its (contextualised) targets.

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

- i. Social mobility and widening participation are more complex than simply looking at a few groups or measures and, in some cases, will be discipline specific. For example, at Brunel we have set up (with HEFCE funding) a programme 'Women in Engineering' to try and reduce the gender gap in that area. Lack of female participation is not an issue across all our subjects, indeed in other areas we should concentrate on increasing male participation. The point is that widening participation has to be looked at in the context of the discipline.
- ii. Universities also focus on specific groups; at Brunel we offer specific bursaries and support for care leavers. It is appropriate for us to focus more on this group than other universities do, as we have built up expertise in supporting their access and progression in higher education. We should be able to differentiate ourselves in this area.
- iii. Some of our ambitions for widening participation do not result in students entering our university. For example, we run a very well respected 'Urban Scholars' scheme which seeks to raise aspiration of school children and increase their access to university. This scheme has been evaluated and shown to be successful. However most of the students go to different a university – which is appropriate. We should be able to include this within our widening participation portfolio. Similarly we are opening a STEM centre to encourage school children (from primary through secondary) to take up STEM subjects – though many of these students will go to other universities or apprenticeships.

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

- i. If the data are sufficiently reliable, granular and can give information at the discipline specific level then it can always help policy and decision making.
- a) What additional administrative burdens might this place on organisations? If additional costs are expected to be associated with this, please quantify them.
- i. There will be administrative costs and burdens associated with this. We already collect data on widening participation to inform policy and management and make returns to the Office for Fair Access. If the reporting requirements increase we will need to build further capacity.

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.

- i. We welcome the entry of new providers of Higher Education so long as they provide a high quality education for students, and that students are not put at high risk of programme closure.

- ii. The quality threshold is important for the students on the programme, and also so that the reputation of UK HE is not damaged. There must be rigorous criteria otherwise it will pose a serious risk to both students and the reputation of UK HE internationally.
- iii. There needs to be a separation between taught degree awarding powers and research degree awarding powers. As at present, institutions need to demonstrate that they are research active before getting research degree awarding powers.

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.

- i. We are content with the proposals that give specific and partial degree awarding powers.
- b) What are your views on the options identified for validation of courses delivered by providers who do not hold DAPs?
 - i. Validation of degrees should be the responsibility of universities. The alternative would be to set up an independent body such as the CNA. This power cannot rest directly with the government or the Office for Students as there would be clear conflicts with their other duties. When the CNA was wound up many of its responsibilities transferred to the Open University. It might be appropriate to ask the Open University or another university (or consortium) to take on this responsibility with a clear duty not to unnecessarily block validation. We emphasise the importance of peer review as a highly valued and informative process which should not be underestimated. It is critically important to the sector and the UK reputation that our high standards are maintained.

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.

- i. We welcome new providers to the sector. However, we need more assurance that the processes will maintain the quality of provision for students and the UK PLC reputation. There needs to be close scrutiny and oversight while the new providers build up a track record.

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.

- i. There must be a distinction between course closure and institutional closure. A provider that has to close a course currently has a responsibility to ensure that any students on the course can complete it (in some cases this might involve transfer to another institution). This duty must remain.
- ii. If a provider totally exits then there must be a sector wide responsibility to support the students (and protect the reputation of the sector). This will only be possible if the sector is confident that new providers are financially sustainable. The Office for Students will need to ensure the financial sustainability of providers, a role currently performed by HEFCE. Consideration must also be given to the ramifications to former students if an institution closes. Students need to be protected from their degree 'loosing value' following such closure; in general a merger or takeover would be preferable.

Simplifying the higher education architecture (Part C)

Question 18:

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

☐ Yes ☒ No ☐ Not sure

Please give reasons for your answer.

- i. We do not support the transfer of QR and REF to the research councils/RUK. Research and education are intimately entwined with one another. The proposal to separate them will create an artificial divide that will be highly damaging to the sector and its world leading reputation.
- ii. University academics do both research and teaching. Most of our buildings house both research and teaching. Students at all levels, though in particular at PGR and PGT, contribute to our research activity. Staff use research to inform their teaching and students welcome the opportunity to learn from, and sometimes work alongside, researchers at the cutting edge of their discipline. Dividing these activities would in the medium to long term diminish both.
- iii. The division will also result in different bodies being responsible for the two main funding streams currently administered by HEFCE, which will add to complexity of the architecture. It is also necessary to have clarity about Higher Education Innovation Funding (HEIF) that has been instrumental in allowing initiatives that allow and encourage knowledge to flow between universities and business, resulting in economic and social benefit for the UK.
- iv. We also believe that there needs to be one body to which universities are accountable for all their activities. The green paper indicates that this will be the Office for Students but it is unclear how this will function in reality.

- v. Some activities of a university do not fall naturally into education or research. For example, at Brunel we have strong research and education links with business. In most cases these links are synergistic, with research bringing in educational opportunities and the education resulting in research proposals or projects. In the short term this can be maintained, but it has required a single agency (HEFCE) that has understood both missions. If RUK are only responsible for research and the OfS only for education then it will be increasingly difficult to develop projects that span both areas.
- vi. A clear example where the divide will be artificial is in PGR students. These students are carrying out research that is an important part of the research mission of university, and yet are students. The same is also true, to a lesser extent, for some PGT students. Universities have to ensure that both research and educational dimensions of these students are catered for.
- vii. We welcome the OfS focus on promoting the student interest and approaching higher education regulation through the student lens. However, it need not be incompatible with promoting the research and business engagement activities of a university.
- viii. We agree that the OfS should include OFFA, and that the OIA should be separate for the reasons outlined in the Green paper.

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

☐ Fully ☒ Partially ☐ Not at all

- i. We would prefer for simplicity of operation that the OfS contract out as few functions as possible. However, if it is to do so then the body in question must be informed (or owned) by the HE sector.

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

- i. It could contract out HESA and QAA functions as present. However, if it is to do so it must maintain strong leadership. The QA and TEF functions should be held in the same place to ensure there is good integration.

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 ☒ 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,

- i. The allocation of responsibilities to the OfS reduces the risk that there is a perception of political interference.

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.

- i. We agree, for established providers but new providers must demonstrate competency over time. Thus providers that move into new areas (for example PGR) or are new providers should be subject to closer scrutiny until they have established a positive track record.
- ii. There is not enough detail at present to judge what the burden on providers and others will be.

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

- i. We have a close working relationship with the students' union to work together to enhance our student experience and education. In addition they provide many services and facilities for the students. The officers of the students' union are elected by the students. We do not see that transparency and accountability are a particular concern.

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.

- i. We agree with the powers that have been given to the OfS but, as highlighted above in response to Q18, have major concerns with the divorce of research and education and with the loss of a single accountable body. This will increase bureaucracy, lessen oversight and lead to a fragmentation of the university function and raison d'être. We would argue that the Office for Students should have wider responsibilities for Higher Education.
- ii. It is important that the OfS respects that the educational relationship is between the university and the student, and not with the OfS. It is the university that enrolls and educates the student and awards the final degree. The university has to be responsible for that education, and for providing the environment in which the student can learn, thrive and develop the skills and knowledge needed for success. The OfS should oversee and regulate the university.
- iii. As indicated above we are pleased with the integration of OFFA into the OfS because that integrates two important parts of our education mission.

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

- ☐ Yes ☒ No ☐ Not sure

Please give reasons for your answer.

- i. The OfS has to be paid for. However, there must be downward pressure on costs, so that money is spent on students' education. If the universities are paying but do not control the operation, then what control will there be on the costs? There would need to be a clear mechanism for controlling the costs of subscriptions, possibly by limiting it to a percentage of university fee income or a capitation fee.
- ii. We recommend that the OfS is BIS-funded. Otherwise costs will spiral and no one will be in control.

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.

- i. In general the powers seem reasonable and proportionate
- b) What safeguards for providers should be considered to limit the use of such powers?
 - i. The creation of the Office of Students and the demise of HEFCE give rise to concerns in respect of institutional autonomy and bureaucracy. Separating HEFCE's functions between a student and research body will inevitably result in there being no authority that has specific responsibility for universities and this is likely to increase the bureaucratic complexity rather than lessen it. It is also important to retain the autonomy of universities which has been a major factor in the success of UK HE when compared to that in many other countries. The mechanisms should therefore ensure that BIS and other government departments remain at arm's length from university operations.
 - ii. Institutional autonomy should not be eroded and the regulatory structure must be proportionate. There needs to be a clear understanding that intervention is only acceptable in rare occasions that there is a high risk of harm. The OfS could be appointed as the overarching authority with the capacity to co-ordinate teaching and research regulation and preserving institutional autonomy. This will provide a single reporting route retaining oversight and cohesion for the sector as a whole.
 - iii. There would need to be a single person who was ultimately responsible for authorising an inspection. In general close communication between institutions and the OfS should obviate the need for any such action.

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.

- i. In general, the proposed deregulatory measures would be welcomed by the University. However, there would be concerns if, for example, as a result of transferring the role of HEFCE to the Office for Students and removing the advisory role of the Charity Commission the University's status as an exempt charity were to be affected.

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?

- i. As indicated above, the separation of research and education is unwelcome for the reasons already given.
- ii. Reduction of the costs and administration of the research councils is welcome.
- iii. The appointment of a strong chief executive who can interact with government will weaken the role of the current chief executives of the research councils, but will in compensation provide a strong voice for research.
- iv. It is not clear what the advantage would be of placing both aspects of dual support funding stream into the same organisation. There are no synergies in the activities associated with the two streams of funding, and there is a concern that they will distract from each other.
- v. We are positive about the engagement of RUK with other departments if it enables a more joined up approach.

Question 25:

- a) What safeguards would you want to see in place in the event that dual funding was operated within a single organisation?
 - i. There are concerns that if dual funding was held in RUK, which is proposed to be a non-departmental government body, that over time, there will be a loss of balance between QR and research council funding of research.
 - ii. The money that is allocated by BIS to the research councils and via QR would need to be ring-fenced for each purpose. It would also be important to ring-fence the money required to administrate the QR process to ensure that processes weren't simplified solely as a means to cut (and divert) costs.
- 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

- i. We would favour hypothecation to protect the two streams of funding. We are concerned that, while that may be effective in the short term, in the medium to long term there could be erosion of one stream or the other. It would also be important to hypothecate the costs of running the two streams (for example administration of REF) as well as the actual funding.

Please give reasons for your answer

- i. As 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?

- i. The REF has sector-wide support and understanding both nationally and internationally. It identifies and funds excellent research where it takes place and has driven up research quality in the UK. The robust assessment framework and the requirements to provide evidence and demonstrate impact have at an Institutional level, enabled Brunel to increase its position in the rankings, demonstrate its calibre as a research-intensive university and gain its fair share of QR funding, RCUK grants etc. The REF has encouraged alignment of research programmes to external priorities and government objectives.
- ii. The most important benefit of REF to the wider-sector has unquestionably been the global reputation of research conducted in the UK. The evidence-based system combined with peer-review (with international academics on peer-review panels) has provided credibility to UK research.

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

- i. As noted in our response to question 7, now that the REF process has sector support and is used in internal management processes to help individual HEIs drive up performance the burden has reduced as it becomes part of everyday practice. This has been achieved by the use of sector supported, robust metrics, many of which are already in the public domain. The introduction of the impact case studies in the last REF late in the cycle, resulted in a huge administrative burden, however now institutions are evaluating impact as the research is conducted the burden for the next REF will be significantly reduced. It is important to remember that the cost and the burden should be spread across the 6 year cycle.
- ii. The “REF Accountability Review: Costs, benefits and burden” (http://www.hefce.ac.uk/pubs/rereports/Year/2015/refreviewcosts/Title_104406,en.html) reports summary of costs of the process to sector

QR funding £m over six years	10,200	
	Costs (£m)	% of funding
HEIs	232	2.27%
HEFCE (all 4 funding bodies)	14	0.14%
	246	2.41%

- iii. Applying a similar process at the Institutional level, the support cost for Brunel University London around research strategy and REF (including central Planning Department (excluding RSDO that supports income generation activities), software licences, Library staff but excluding HR costs for staff development, academic time spent writing impact case studies) is predicted to be approximately £160, 000. With a REF income of £12,000,000 that equates to a burden of approximately 1.32%.

REF2014 income (£12m per year)	12,000,000	
	Yearly costs	% of funding
Planning staff	58,927	0.49%
Research Management infrastructure (BRAD, BURA, Library staff, etc.)	100,000	0.83%
	158,927	1.32%

- iv. There are a variety of ways that the burden could be reduced:
- v. If all research active academics were submitted to the REF with all their publications during the evaluation period included, the burdensome submission selection process would be avoided. Random selection of staff for evaluation would further reduce the post-submission process, however, less research intensive areas would be disadvantaged by this method.
- vi. Another alternative would be to submit all outputs but not attribute them to individual staff. Alternatively institutions to submit their best 100 outputs
- vii. Further suggestions include ensuring that anything that is already in the public domain is harvested from the public domain. We should avoid requests to institutions for reports/resubmissions on the same outputs to multiple bodies. With the implementation of the open access policy the burden will decrease further. There is no longer a need to ship large numbers of boxes containing hard copies of papers. It is therefore worth looking forward to predict further possible changes that may serve to further reduce the burden. We would not favour moving to a metrics-only approach to REF, as previous reviews have highlighted this could lead to perverse outcomes and impact on equality issues for staff. We look forward to providing further evidence to the Stern review.
- viii. It is worth re-iterating that the demonstrable role that REF has made to help HEIs drive up performance and its use in everyday management of universities has reduced the burdensome nature.

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

- i. Interconnectivity between institutional data bases and repositories and funders is key to improved research information management. Supporting evidence for this can be found in: UK Research Information Shared Service (UKRISS), <https://ukriss.cerch.kcl.ac.uk/>. Such interoperability would help to avoid multiple requests to report the same information, as detailed in the response above (Q27).
- ii. Further suggestions can be found in “Feasibility Study into the Reporting of Research Information at a National Level within the UK Higher Education Sector” published in 2013. <http://www.tandfonline.com/doi/abs/10.1080/13614576.2013.841446>

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.

- i. As indicated in our executive summary.

Thank you for your views on this consultation.

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

Please acknowledge this reply ☒

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would it be okay if we were to contact you again from time to time either for research or to send through consultation documents?

☒ Yes ☐ No

BIS/15/623/RF