

# Fulfilling our potential: teaching excellence, social mobility and student choice

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*18 January 2016*

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**UCU submission to BIS consultation**



## 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

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

<input type="checkbox"/>	Alternative higher education provider (with designated courses)
<input type="checkbox"/>	Alternative higher education provider (no designated courses)
<input type="checkbox"/>	Awarding organisation
<input type="checkbox"/>	Business/Employer
<input type="checkbox"/>	Central government
<input type="checkbox"/>	Charity or social enterprise
<input type="checkbox"/>	Further Education College
<input type="checkbox"/>	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
<b>X</b>	Trade union or staff association
	Other (please describe)

## 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?

**The University and College Union (UCU) is the largest trade union and professional association for academics, lecturers, trainers, researchers and academic-related staff working in higher and further education throughout the UK. We welcome the opportunity to respond to the consultation on *'Fulfilling our potential: Teaching Excellence, Social Mobility and Student Choice'*.**

**Before addressing the question of potential equality impacts of the proposals, we would like to highlight the key issues for UCU with regard to two key areas:**

**Firstly, UCU believes that the reputation of UK higher education will be damaged by plans to make it easier for private, for-profit providers to enter the higher education system and in particular to obtain both degree-awarding powers and university status. We continue to support the existing criteria around academic performance/track record, student numbers and finance and governance arrangements. In addition, we believe there is a case for additional requirements on for-profit providers, in particular a requirement for them to commit to fundamental principles such as academic and pedagogic freedom, collegial governance, equal opportunities and widening participation, the maintenance of academic standards and support for student welfare.**

**Secondly, UCU supports the notion that teaching should have equal status with research within and across higher education institutions and that good teachers should enjoy the same professional recognition and opportunities for career and pay progression as good researchers. However, these positive objectives are unlikely to be achieved by the proposals in the green paper; in fact, the TEF proposals may lead to a number of negative consequences for teaching and learning. In particular, we are concerned about the use of proxy metrics in the TEF and are opposed to linking TEF scores to tuition fees. We would also like to raise the problems of work intensification and goal displacement, since time producing data for TEF metrics are time and resources not spent on actual teaching and research.**

**We welcome the fact that there is a special emphasis on widening participation and social mobility in the proposed TEF (see for example chapter 4). There is a relatively strong focus on both socio-economic disadvantage and ethnicity in the green paper, though the issues of disability and sexual orientation receive little attention.**

**However, the rhetoric on disadvantaged groups is undermined by the government's regressive changes to the student support system, including the introduction of high tuition fees and the cuts to HEFCE's student opportunity fund that were announced in the spending review. The most significant change, however, is the government's decision to abolish means-tested maintenance grants in favour of loans. As the Sutton Trust**

**and others have pointed out, this policy will have a disproportionate effect on students from lower socio-economic backgrounds. None of these major policy changes are subject to the equality analysis outlined in Annex A.**

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

Yes

No

Not sure

Please provide any further relevant evidence.

**In addition to the comments above, we would like to see BIS extend the equality impact assessment to older, mature students.**

**We believe that the equality analysis should also explore issues around geographical mobility and travel to study patterns, as this would relate particularly to the needs of mature and working class students. Many local and metropolitan authorities use travel to work journey data when planning local transport. There is a need for similar data on travel to study journeys for college and university students. The government world view seems to be that nearly all students are geographically mobile and can travel from home to study, e.g. to complete their degrees in the case of institutional closure. In fact the students most at risk of having studies disrupted by institutional closure are the ones most likely to be home based.**

**There is also an important link between access to postgraduate education and the diversity of the academic workforce. One of the challenges that we face is making the academy more representative of the ethnic and racial mix of the student body. There is nothing in the green paper on the equality and diversity of the wider academic community and this reflects the general absence of staff from the consultation document as a whole.**

## **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.

**UCU believes that students and employers should have straightforward access to good, relevant information about higher education courses and institutions. Given that the technical consultation on the TEF won't be published until later in 2016, it is too early to assess whether information from the TEF will be used to better inform student and employment decision making. On the basis of the current information contained in the green paper, including the proposal to rely heavily on existing data sets collected for entirely different purposes, we remain sceptical about its potential to do this. We have a number of reasons for this scepticism.**

**It is important that students make an informed choice as to where and what to study, but this is a complex issue and choices will include considerations such as if they can afford or want to live away from home, modes of study, the extent to which their chosen subject is available, continuation or possibility of paid employment, and the course/institution quality. Although the National Student Survey, the Key Information Set data and the Destination of Leavers from Higher Education (DLHE) survey are there to help with the provision of information, in general, there is a lack of concrete evidence to suggest that they are key determinants of student choice in**

higher education because of the other considerations detailed above.

This may be partly the result of methodological problems with the data (e.g. the absence of meaningful statistical differences between universities and between courses in the NSS), but more importantly because prospective students cannot act as Which-style 'consumers' in some form of higher education 'marketplace'. The narrow focus on employability and earnings post degree that these data sets encourage do not reflect the complex range of inputs into student choices. The average employee will have nine jobs in their lifetime and so university needs to provide a broad education beyond these narrow ranges.

Furthermore because of concerns about the statistical validity of NSS data we recommend that HEIs sign up to a code of practice not to use statements of rank order position in their claims about their own institution and courses. Such league tables also disadvantage potential students who do not have the support network to help guide them through the information.

The over- emphasis on the use of quantitative evidence (frequent references to "measuring" and "metrics") obscures the importance of *qualitative* evaluation of teaching, student learning and the student experience. The latter should play as much part in the proposed TEF as the former.

Alternative providers should be required to submit data to HESA as HEFCE funded providers are. This is essential for informing student choices and for transparency about what public money is spent on through the loans system. It is simply not possible for the public to know what its subsidies are being used for, nor for genuine comparison between traditional and alternative providers without the submission of data to HESA.

Finally, we do not find the assumption in the green paper that 'market forces' are the best way to drive up teaching quality and ensure adequate academic standards a credible one. For markets to function as a proxy for quality, a number of conditions must be met, including oversupply, consumer choice revision, and the ability for concurrent evaluation. Markets regulate between producers attempting to maximise profitability, which may lead to innovations, some of which may correspond to improvements in quality.

In fact, research from Paul Temple and Claire Callender has shown how market forces can change institutional priorities and cultures in ways that are not always beneficial for student learning. For example, increased competition between HEIs has resulted in a large rise in spending on marketing and on facilities that may have little direct impact on the student learning experience (e.g. student accommodation, sports facilities etc.).

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.

**The TEF seeks to replace quality audit with simplistic metrics. It is both unproven and highly risky. Any proposal of such a radical nature must be subject to rigorous pilot study and evaluation. In order to evaluate the TEF**

**one would need to run the old and new processes concurrently, evaluate the new TEF against the old, and investigate the reasons for divergent performances.**

**Ultimately we believe that the TEF should be open to all types of providers, but our concerns about the TEF in practice are such that we believe a “big bang” implementation would be disastrous.**

**As with the REF, we are concerned that the TEF may become a straight-jacket for HEIs and may discourage staff or departments from implementing new courses and practices that do not fit easily into TEF-style metrics.**

**Given the focus on a flawed set of ‘common metrics’ there is a danger that the TEF will lead to increased homogeneity, conformity, and lack of creativity and innovation in learning and teaching (i.e. a greater focus on traditional disciplines for full-time, young undergraduates with A’ level qualifications).**

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?

**As mentioned in response to question 1, we welcome the fact that “eligibility for the TEF should be contingent on having measures in place to facilitate the access and success of disadvantaged groups.” However, the inclusion of student outcomes data such as retention rates and employability data in the TEF may end up disadvantaging universities that already focus on widening participation and part-time mature students.**

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.

**Firstly, UCU disputes the overall rationale for the new TEF. In particular, the Minister’s assertion about the ‘lamentable’ nature of some university teaching is simply not backed up by evidence.**

**The FSSG report on the sustainability of funding for teaching and learning, for example, concluded:**

***“Overall the indicators show improvement in several areas of teaching and the student experience, and the engagement of students with the design and***

*delivery of their education, which have been given even greater priority since 2008."*

**At the same time, we recognise that more needs to be done to ensure the greater value and recognition of teaching (as opposed to simply research) within academic career structures. We expand on this in response to questions 10 and 11. Such improvements do not require any acceptance of the proposals in the Green Paper (and indeed, would be more difficult to implement should the Green Paper be implemented).**

**Secondly, alongside a number of institutions and student representatives, we are very concerned about the proposal to link the TEF to tuition fee rises from 2017-18 onwards. As the OECD have pointed out, England already has the highest university tuition fees in the industrialised world: the TEF proposals seek to increase these further. In the words of the Sutton Trust: "*Fees are too high already. Universities with good teaching have the incentive of being able to recruit more students and increase their budgets in that way.*"**

**Thirdly, we consider that the outline proposals offered here fail to recognise that good teaching and learning, and a high quality student experience, are crucially dependent on the staff who actually deliver teaching and learning and who provide other support to students. Currently, excessive student -staff ratios, insecure employment, and unreasonable workloads undermine the capacity of staff to do the best teaching, learning, and student support of which they are capable, thereby reducing the benefit to students. The paper's commendable concern with improved access and opportunity for hitherto disadvantaged groups similarly fails to recognise that it is staff, who can provide advice encouragement and support through regular contact with such students, backed by suitable mentoring and training, who are the key asset in reducing dropout rates. Rather than using the fee mechanisms as a means to sustain and improve high quality teaching and learning, it would be more productive to explore what means might be used to ensure that HEIs address these obstacles to best practice and to ending inequality.**

**Rather than an academic-led initiative designed to encourage greater recognition of teaching, the primary function of the TEF appears to be the further marketisation of the higher education sector. In our view, the link between the TEF and tuition fees risks creating a 'high-stakes' assessment regime which will increase the likelihood of institutional 'game-playing' (as has happened in relation to previous research assessment exercises). We also have concerns that the TEF may over time lead to the complete deregulation of student fees, leading to a relative reduction in funding for many institutions, including many of those with the best record in enabling students from non-traditional backgrounds to attend university. TEF will allow institutions that do well in widening participation to charge more, but this increase in the cost of university could have the perverse and surely unintended consequence of putting off the very students that the proposal is aimed at helping.**

**We will now address the specific questions in the consultation document.**

**QA review**

**We are opposed to the implementation timetable for the TEF, as noted previously. The TEF needs to be properly trialled and evaluated, not implemented and then adjusted. However, in light of the tight timetable proposed by the government in implementing the TEF, the decision to use a 'successful' QA review as the basis of a first level TEF award would be a sensible one. We support the particular definition used in the green paper ("meets UK expectations" or higher).**

**Of course, a number of institutions have not completed the new QA reviews. The timing of TEF level 1 decisions, therefore, may create a scramble for HEIs to complete their reviews or in some cases launch appeals to ensure their eligibility for the initial fee rise.**

### ***Alternative providers***

**In part B, we highlight our concerns about speeding up entry for private providers. This is based on the problems relating to recruitment, retention and low quality at a number of private providers, especially but not limited to for-profit providers. We call on the government to review its policy of relaxing quality controls on private providers, particularly as it places the international reputation of UK higher education in jeopardy. One of the best ways the government could improve quality and maintain academic standards is to restrict, rather than increase, the role of for-profit, private providers.**

### ***The proposal to move to differentiated levels of TEF from year two***

**In the absence of a technical consultation paper on the TEF setting out the operational details of metrics and the assessment criteria, process and outcomes, it is very difficult to answer this question adequately at the moment. But we know that the timescale (both for TEF 1 and TEF 2) will put great pressure on the sector to design, pilot and evaluate a new framework.**

**We repeat that we are in favour of evidence-based policy making. Evidence of the efficacy and performance of proposed metrics must be forthcoming prior to roll-out.**

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.

**In terms of timing, we would theoretically prefer the option of a rolling cycle of assessments to a periodic REF-style review. This will allow a degree of**

**flexibility in allowing institutions to decide whether to opt in or out of the higher level TEF awards. A rolling cycle may also prevent an REF-style academic transfer market (although we are currently sceptical about the extent to which the TEF will drill down to individual academic careers).**

**Given the limitations of metrics, the introduction of 'a panel of independent experts' to make judgements on awards will be a necessary element in the new TEF architecture. For this to have any credibility it will need to be on a discipline/subject basis and led by academic experts who understand teaching and learning process and must include those with current experience as practitioners delivering teaching and learning rather than just those with technical expertise in teaching and learning. As with the REF there will need to be provision for the evaluation of cross- and interdisciplinary teaching and learning. A significant problem is that the scale and range of expertise required could easily correspond to the REF panel structure. This does not appear to have been costed in the proposal.**

**Furthermore, we do not understand how employer representatives will have the relevant knowledge and experience to be able to judge the quality of teaching in higher education. We look forward to further details in the technical consultation paper.**

**Linking TEF assessments to tuition fee rises is likely to result in more risk-averse judgements being made by panels. In particular, there may be an increased possibility of legal challenges by institutions if a lower judgement barred them from increasing their fees by the maximum amount possible. Again we look forward to further details in the technical consultation paper, including the issue of appeals.**

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.

**Increased administrative burden on institutions is an inevitable consequence of the high-stakes assessment proposals envisaged in the green paper. This is partly because, as noted, metrics on their own are poor proxies for teaching excellence and therefore the TEF will likely require institutions to provide a significant amount of additional qualitative evidence (similar to the REF impact case studies). As has happened with the REF, it will lead institutions to invest heavily in preparing for the TEF (e.g. increased administrative burden on staff, the creation of new TEF-specific roles etc).**

**At present, with inflation at 0% and with it unlikely to rise rapidly in the next few years, we question the financial incentives for institutions to participate in the TEF. Given that institutions will be expected to bear the cost of the assessment process, the TEF might end up being another drain on the resources that academics need to do their jobs.**

**In conclusion, despite the emphasis on deregulation in the green paper, the TEF will lead to more state interference and bureaucracy as part of yet another attempt to engineer a market in undergraduate tuition fees.**

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

Yes       No       Not sure

Please give reasons for your answer.

**We agree in the *principle* of a phased introduction of the TEF (once it has been properly trialled and evaluated), but we do have concerns about the process of differentiation and award outlined in the green paper. Firstly, for the TEF to be a credible exercise, it is vital that assessments are made at a disciplinary rather than simply institutional level. We note that the government is only talking about this as a “preferred” option “as soon as practicable”.**

**Secondly, we are wary about the introduction of a REF-style grading system for ‘teaching excellence’. It is likely to result in significant ‘gaming’ by institutions, who instead of preparing for the TEF would be better off focusing directly on enhancing student learning.**

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 would like to reiterate our concerns about alternative providers being given further incentives to access increased public subsidy and support (see our response to part B of the consultation document).**

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.

**UCU believes that the effectiveness of a TEF will depend heavily on the contributions of academic and academic-related staff. So far, their perspectives have been largely ignored in current debates on the TEF and we are concerned about the “absence of the academic” from the wider green paper.**

**The current TEF proposals offer very little for staff who do the teaching and support student learning in higher education. This is a missed opportunity, particularly if the government is serious about one of the aims of the TEF, namely to: *“build a culture where it is recognised that teaching has equal status with research within and across HE institutions. Outstanding teachers should enjoy the same professional recognition and opportunities for career and pay progression as great researchers (p.18).”***

**Everyone recognises the need for high quality teaching, but unless government and institutions place staff at the centre of the process and address underlying issues like casualisation, workloads and lack of career progression, the green paper is unlikely to achieve its stated objectives. Moreover, a metrics based approach – linked to tuition fee rises – fails to**

address the key elements that enable good quality teaching and learning to flourish.

We will now comment on the specific aspects of the teaching excellence proposals.

### ***Teaching quality***

We are keen that any measures used to recognise teaching quality are ones truly representing improvements which add value to the student educational experience (i.e. rather than performance indicators that reflect other factors such as the socio-economic and ethnic composition of the student body in different institutions).

In an ESRC-funded project on the quality of undergraduate education, Paul Ashwin and colleagues summarised the academic literature on what constitutes 'good teaching'. The authors concluded that:

*"Good teaching involves lecturers having the opportunity to think and talk with others about how to help students understand disciplinary knowledge through design of curricula, teaching and learning activities and assessment (Entwistle, 2009; Gibbs, 2010). This can be a time-consuming and challenging process for lecturers".*

We call on BIS, the funding bodies and sector representatives to incorporate this evidence into the design of any future teaching assessment system. In addition, we believe initiatives aimed at improving still further the quality of teaching should be underpinned by the following key principles:

- That teaching is an inclusive, collegial activity;
- That staff need sufficient time to focus on small group teaching and individual student needs, as well as to engage with relevant scholarship and to reflect on and further develop their practice;
- That good teaching is underpinned by good working conditions for all staff, including better job security, relevant training, mentoring, and career development;
- That good teaching needs to be properly, fully, and fairly recognised in academic career structures.

### ***Learning environment***

We welcome the reference to the following criteria: *"The provider recognises and rewards excellent teaching through parity of status between teaching and research careers, and explicit career path and other rewards".*

In recent years we have witnessed an increasing differentiation and diversity

of academic roles, careers and contracts in higher education. One of the main trends has been the growth of new 'teaching-focussed' or so-called 'teaching only' posts in UK higher education. A survey of UCU members in 2014 revealed that irrespective of contract type, significant numbers of members are engaged either exclusively or mostly in teaching-related activities. While 57% of the sample described their role profile as teaching and research, less than one-third said their workload reflected this. Despite the growth of teaching-focused roles, the research shows that these roles are still perceived as second-class options occupied by those who have deemed to have 'failed' at research. This second-class status needs to change, first by recognising excellent teaching, and second, by correcting for the removal of research opportunities implied by these teaching-focussed contracts.

Firstly, UCU has been pushing for proper recognition for teaching in the academic career structure, most recently with our guidance to local branches on 'bargaining for better teaching-focussed jobs'. In terms of higher education policy, we are calling for the new quality assessment system and the TEF to include an analysis of the *implementation* of promotion criteria on 'rewarding excellence in teaching'. This will require detailed evidence such as on the numbers of teaching-focussed staff who have been promoted and on the proportion of professors who have achieved this status on the basis of their excellent teaching.

Quality teaching is also underpinned by decent working conditions, including job security for staff. Any system aimed at improving teaching must examine the relationship between the widespread job insecurity experienced by a large proportion of academic staff and the teaching quality. We explore this further in relation to question 11.

Secondly, what makes higher education teaching distinct from other forms is that students at undergraduate level and above are expected to develop a *critical* approach to their subject. It follows that staff who teach at this level are expected to be able scholars and researchers, and at minimum to have time and opportunity to continue to develop in this direction. Staff who are expected to focus on teaching must be given the opportunity to refocus back to research later in their careers, something that is difficult as research is continually updated.

We note that despite the reference to research "reinforcing" the learning environment, the Green Paper makes no reference to this principle in its proposals elsewhere, whether they be in relation to teaching quality, requirements for new providers or governance.

### ***Student outcomes and learning gain***

We caution against the use of degree classifications as one of the potential indicators in the TEF as it is likely to fuel grade inflation.

We note that the notion of 'learning gain' is gaining currency in UK policy circles. But it is very difficult to measure in an accurate and meaningful way, since again there are real problems in relying on quantitative data. Cross-institution and cross-discipline comparisons are hugely problematic as there are significant variations in marking criteria and mechanisms for degree classifications across and within institutions.

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.

**UCU has major problems with the choice of common metrics proposed for stage 2 of the TEF and in particular we fear that the metrics on retention and graduate employment outcomes are likely to end up reinforcing existing institutional hierarchies within the sector.**

**Moreover, we believe that none of the three indicators adequately measure the quality of teaching and learning. Two out of the proposed three (employment outcomes and student assessments) cannot be said to be valid proxies for educational quality. The recent review of metrics in research assessment (chaired by Professor James Wilsdon) has highlighted the limitations of metrics as a proxy for quality. We believe that similar objections apply in relation to teaching-related metrics such as the DELHE survey, retention/continuation data and NSS satisfaction data.**

**We are particularly concerned about the use of graduate employment data as one of the main indicators of the quality of learning and teaching. This agenda seems to imply that HEIs and their staff can somehow be held accountable for the occupation and salary that students access after graduation. This approach risks de-valuing subjects and disciplines where students are oriented to socially useful (but less well-paid) occupations. It also fails to take into consideration the unequal nature of graduate employment (i.e. the fact that pay gaps already exist for women, BME and disabled people) and ignores evidence that graduate employment is significantly affected by general economic and business conditions.**

**We note how employment outcomes and student assessments in particular vitiate against specifically difficult academic subjects. Mathematics graduates are rewarded with lower incomes than accountants. Coupled with student assessments, we would expect to find that a high-scoring degree is one that avoids difficult academic subjects in favour of easier, applied, vocational, "practical" subjects. Both of these metrics are also likely to end up reinforcing existing institutional hierarchies in the sector.**

**We believe that the only rational way to address any perceived employability or skills gap would be on a subject-by-subject basis.**

### ***Training and employment of staff***

**We welcome the implicit recognition that the contractual status of academic staff is one of the indicators influencing the quality of the learning experience (i.e. on page 34, the reference to 'Training and employment of staff – measures might include proportion of staff on permanent contracts').**

**However the Green Paper makes no proposals to address this, and the proposals the Green Paper does make will likely make stable employment more difficult as institutions face years of disruption.**

Temporary contract working is endemic across UK higher education, with 69,000 (43%) out of a total of 161,000 contracted academic staff on non-permanent contracts. Among 40,000 'teaching only' staff, 29,435 (73%) have non-permanent contracts. These figures do not include the 75,000 so called 'atypical' academic staff who are also largely engaged in teaching but who are usually employed only on an "as and when" basis and have little access to CPD, career development or other scholarship opportunities. Job insecurity also impacts on the quality of the student learning experience, for example, on marking and assessment processes and the opportunities for staff on casual contracts to access professional development.

Properly paid and well-motivated academic and academic-related, professional support staff are a key element in delivering high quality teaching and learning in higher education. We need to see major improvements to the professional and working lives of the thousands of sessional staff who teach in our universities and colleges. In UCU's view, casualisation can be tackled by a far greater use of workforce planning and improved employment contracts. As yet university employers have failed to pick up this challenge.

In 2001, one of the UCU's predecessor unions proposed to the Education and Employment Select Committee that the sector's key agencies produce "a genuine study of the effects of current casual employment practices on the quality of undergraduate teaching". Nearly fifteen years later we believe such a report is urgently required as a first step towards increasing the status of teaching in our universities.

### *Institutional evidence*

*In terms of additional institutional evidence we welcome a focus on the "ways in which the institution builds capacity and capability, motivates and engages teaching staff, and supports continued improvement through training, reward and recognition mechanisms, and career progression."*

For this to be meaningful, it will require institutions to work with academic staff unions on a positive agenda for professional development (along the lines advocated in the 2014 report to the Higher Education Academy by William Locke).

## **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.

**UCU has welcomed the target to double the participation rate of young people from disadvantaged and black and minority ethnic backgrounds, but considers the proposed measures are unlikely to achieve it. We note that the data in the appendices shows that 'disadvantaged' students are least represented in**

**the universities with the highest fees.**

**We are concerned that whilst it is helpful for any evaluation of quality (including but not limited to the proposed TEF) to be reported by disadvantaged and under-represented groups, the proposed ability to charge higher fees is likely to have the consequence of discouraging the very students that the proposal is aimed at helping. Fees are a particular barrier to students from groups that worry particularly about debt and/or who are concerned about their ability to earn sufficient to pay off the debt without living in poverty. This proposal is likely to disproportionately benefit institutions that make relatively smaller progress in widening participation.**

**We are concerned about the ambiguous use of language around student fees: 'We do not envisage the fees charged to individual students changing during their course'. This statement leaves far too much leeway for regressive, retrospective changes to fee arrangements. The government has already set a worrying precedent here by ignoring calls from the sector for the repayment threshold for student loans to continue to be linked to inflation. Such ambiguity has the potential to damage trust, and undermine the credibility of the system for prospective students and those in an advisory role.**

**We welcome proposals to introduce a name-blind application process, but supporting fairness and transparency must go further than this. We have published research<sup>1</sup> to show that 7 in 10 respondents to our application and admission survey would like to see the implementation of a post-qualification application process. Furthermore, we have published a charter<sup>2</sup> for what a fair and transparent application process should look like.**

**Whilst the creation of a social mobility advisory group is a helpful one, we believe that it requires a far wider membership than Universities UK. Supporting Professionalism in Admission (SPA), the Social Mobility and Child Poverty (SMCP) Commission and OFFA should all have a key role here.**

One of the ways to increase participation would be to remove fees and bring back full grants for all students.

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.

**UCU has welcomed the work of OFFA in encouraging institutions to take widening participation seriously. We are concerned that OFFA will lose its influence if it is subsumed within the proposed Office for Students. Whilst we welcome the proposal that the director of fair access should have a 'specific and strengthened' role, we would like to see a clear statement to show that the independence of the director will be maintained, that the individual will be publicly appointed and that the role will maintain its**

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<sup>1</sup>[http://www.ucu.org.uk/media/pdf/s/5/ucu\\_undergraduateapplicationandadmissionsurvey\\_jun15\\_rev1.pdf](http://www.ucu.org.uk/media/pdf/s/5/ucu_undergraduateapplicationandadmissionsurvey_jun15_rev1.pdf)

<sup>2</sup>[http://www.ucu.org.uk/media/pdf/b/a/ucu\\_fairadmissionscharter\\_nov15.pdf](http://www.ucu.org.uk/media/pdf/b/a/ucu_fairadmissionscharter_nov15.pdf)

single focus on fair access.

In general, we welcome OFFA's proposals for the following:

- allowing fee loans to be applied to part-time credits, regardless of whether a student wishes to secure a full qualification. This would enable people from disadvantaged backgrounds to have a 'taste' of higher education without needing to find funds upfront;
- encouraging credit accumulation and transfer between recognised awarding institutions; and
- extending the relaxation of restrictions on students with 'equivalent level qualifications' to all part-time courses.

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

**Between 2010/11 and 2014/15, the number of UK/EU part-time undergraduate entrants fell by 143,000, a decrease of 55% (Callender, 2015, p. 17-18). The massive drop in part-time enrolment is one of the major HE policy failures of recent years. The proposals in the green paper do not adequately address how we promote fair access for part-time students. We call for part-time *and* postgraduate student issues to be included as part of the remit of the new social mobility advisory group.**

**We re-iterate that since the paper has identified that, in addition to access, retention in universities is disproportionately a problem for students from disadvantaged groups, attention needs to be given to the role of staff in reducing dropout rates. Staff provide vital personal support, advice and encouragement to such students and need the time and where relevant training to do this to the best of their ability, as well as deserving specific recognition for the contributions which they make in this area.**

Question 13:

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

**We welcome proposals to establish a power to require HE bodies to provide relevant data and information to help better target efforts on widening access. We hope that the proposals will not negatively impact on the previous good work of OFFA as the availability of such data should help promote trust in the admissions system.**

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

## 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.

**The unrestricted growth in alternative providers, coupled with a regulatory framework ill-equipped to deal with them has left students and UK taxpayers at unacceptable risk. A regulator should have the power to take the necessary actions needed to protect students and the reputation of the sector while enhancing improvement and innovation.**

**UCU believes that to defend the integrity of our HE sector and ensure that public money is spent efficiently we need to take firm action and introduce legislation to create a single, powerful regulator able to deal with the significant *extra risks* posed by for-profit providers. The current proposals in the green paper, particularly the plans for speeded up entry into the sector, fail to address these risks.**

**We acknowledge that private colleges and universities have been a feature of our HE system for a long time. However we are strongly of the opinion that higher education providers should be not-for-profit bodies because these pose a far lower risk to the sector. Making it easier for alternative providers to award degrees or become universities exposes the sector, and most particularly to students, to greater risk from for-profit organisations looking to move into the market for financial gain rather than being motivated by providing excellence in education. Allowing for-profit corporations and private equity funds into the sector with no regulation has exposed our system to the problems experienced with for-profit higher education in the USA and reported on comprehensively by Senator Tom Harkin in 2012.**

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.

**UCU is strongly opposed to reducing further the student number criterion for university title. We would question the ability of an institution to perform the functions required of a modern university with a very small student body and whether the likelihood of longevity of such an institution is reduced. We are also concerned about the impact on the coherence of the UK higher education system (for example, in Scotland, a university title means having research degree-awarding powers as a minimum requirement).**

**We do agree that the process for DAPs and university title lacks clarity, although the fact there are two routes is entirely of the government's own making in the haste to fast track decisions on alternative providers seeking university title.**

**The transfer to HEFCE of decision-making therefore gave some independence to the process which should be maintained in the new set up. Should the role of the Privy Council in making these decisions be under review, we would urge the government to maintain the independence of the new proposed decision-making body. The historic significance of the role of the Privy Council should be carefully considered before it is altered.**

**We also do not believe there is a need to speed up the process. Such decisions should not be taken hurriedly and the process should be as long as necessary to conduct due diligence and alight at the correct decision for the sector. Thus we support the current four year track record requirement. We do not believe that three years is long enough to prove reliability in delivering a quality education. It should be noted that the four year requirement is based on the standard undergraduate degree in England and Wales being three years; the further year permitting evaluation.**

**We suggest that it is a fallacy to believe that the principal barriers to entry for new providers are structural. Rather, we suggest the principal barrier is one of reputation, and the understandable reluctance of students to risk their careers on an institution and degree of unknown quality.**

**UCU agrees with the principle of a 'risk based' approach (insofar as there are known risks with for-profit organisations and all new providers will represent a significant risk to students), but this should also account for changes to corporate form and the monitoring regime should be flexible enough to respond accordingly. In particular, UCU would propose an enhanced audit regime for *for-profit* providers to mitigate against the extra risk posed by for-profit corporate forms, a regulatory regime that is able to deal with 'degrees of risk' and a detailed preapproval process and monitoring programme for dealing with substantive corporate change. In addition, we believe there is a case for private, for-profit providers being required to sign up to a minimum set of ethical service standards, which includes, amongst other things, a commitment to academic and pedagogic freedom in their articles of association and academic freedom clauses in the contracts of employment.**

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

**We believe in the importance of existing degree awarding regulations which require the presence of an 'academic community', including in their number research-active academic staff, to safeguard standards. For that reason we are opposed to the idea of giving DAPs to non-teaching bodies, including edubusinesses such as Pearson/Edexcel.**

**We would add that maintaining the distinction between universities and university colleges is in line with the stated aim of providing additional and clearer information. Allowing all organisations that provide degrees to call themselves universities would cause confusion.**

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.

**UCU has consistently warned that the rapid expansion of private providers has been a disaster and has urged the government to take extra checks, not seek to allow more into the system.**

**Between 2010/11 and 2013/14, the number of students claiming support for courses at alternative providers rose from 7,000 to 53,000 while the amount**

of taxpayers' money paid in loans and grants rose from around £50 million to around £675 million. Yet a number of private providers in receipt of this money have been criticised for poor attendance and graduation rates, students not being properly registered on courses and a lack of quality checks. Given the strong concerns expressed by the Public Accounts Committee about the performance of private providers, as well as a number of highly critical QAA reports, we believe that this approach carries considerable risks to academic quality and standards. Quality and reputation are critical for maintaining our position in the global HE 'marketplace' and is one of the reasons why at UCU we are very wary of increased for-profit involvement in the HE sector.

As a result, we do not agree with the proposed actions to speed up entry into the sector. Many of these procedures were put in place by BIS and regulatory bodies to deal with the scandals that emerged in recent years. A robust gateway into the sector is essential to protect the reputation of the sector and maintain quality. Despite the protestations of alternative providers, their number has increased and student numbers have risen rapidly so there is no demonstrable overly burdensome process for them to go through, they have managed to expand under current system. We should be looking at reform of the system from the perspective of protecting students and quality and not simply to make things easier for alternative providers. This requires a process of 'levelling up' not 'levelling down' as proposed in the green paper.

## 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.

**UCU is concerned by the language of 'provider exit' from the sector. We need a stable, successful sector that builds on the previous successes of our institutions in educating many thousands of students. Higher education institutions are not like corporations that can enter and exit the market according to financial considerations. They have at their heart an educative purpose which entails substantial social and economic obligations, regionally and nationally, and long-term, which go above and beyond bottom line calculations. A larger threat to student learning is therefore the perpetual entry and exit of for-profit providers who do not have education at their core but are primarily vehicles for profit-making.**

**In the current marketised environment, contingency arrangements, however, are vital for safeguarding students. UCU has long advocated an ABTA style protection scheme for students. A bond would provide students with the necessary protection whereby members of the scheme (all institutions offering courses designated for student support) would ensure the affected students would be able to complete their qualifications. Students should also be able to port credits or courses already completed to allow them to continue their studies without penalty. The bond subscription level could be linked to**

**the financial risk of the institution so that stable, well-managed institutions are not disproportionately affected by the establishment of the scheme.**

**But we must be careful not create the conditions whereby providers are entering and exiting the market with impunity in the first place. Having a number of institutions with a short life span poses a risk to the sector even where students have completed their course because the qualification gained will have no currency with employers or other educational establishments where there is little evidence about the short lived institution in terms of academic reputation, quality of education provided, content of courses and so on. This would leave students with essentially a useless qualification despite the time and money invested in good faith into a state-approved institution.**

**Student protection, therefore, is not only for students whose HEIs close while they are studying there, but also can be relevant if a closure occurs several years after graduation. As a result, we believe there may be a need for some form of central register or depository of academic certificates and references that students can turn to if their former institution has 'exited the market'.**

**At the moment it is more common for students to be faced with a sudden withdrawal of a course rather than total institutional failure. There have been cases where students have been informed mid-degree that their course will not be continuing. Although we would urge institutions to do all they can to protect existing courses and the students on them, and that mid-course withdrawal are unacceptable we have seen in the past that universities have worked together to provide a solution (e.g. when Chemistry was withdrawn from the University of Exeter in 2005, the Universities of Bath and Bristol stepped in to offer the affected students places with funding being agreed from HEFCE).**

**However such an outcome is going to become increasingly more difficult, and students will suffer. We regret that a collaborative, partnership model will be further eroded as a result of the hyper-competition promoted in the green paper.**

## **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.

**As the current higher education architecture largely dates from the early 1990s, we recognise that it may be a good time to review the current arrangements. But we do have some concerns about the proposed changes to the higher education architecture.**

**Our main concern with the proposed reorganisation is that it will lead to a further separation of teaching and research in higher education (i.e. teaching overseen by the OfS and research by Research UK). It is not enough simply to assert 'the relationship and mutual benefits between teaching, scholarship and research' (p.32): we need systems in place that promote greater synergy**

**between teaching, scholarship and research. The current proposals are likely to do the opposite.**

**We think that serious attention should be given to the best ways of preserving and using the expertise of HEFCE in HE policy and management. However, we feel that HEFCE has had a poor record in either analysing or addressing issues relating to staff which have a primary impact upon students (for example, casualisation, academic careers, student-staff ratios etc).**

**Our hope would be that the new Office for Students would see these issues and the role of staff themselves as fundamental to the success of higher education rather than ignoring them. But this will require the genuine representation of staff and students in its governance structure and not one dominated either by the HE "great and the good" and large employers' organisations.**

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

Fully       Partially       Not at all

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

**We believe there is a strong case for retaining an independent quality assessment/assurance agency. While UCU members are not uncritical supporters of the QAA approach, there is a recognition that peer review remains an essential element in external quality assurance. In the response to the recent HEFCE review of quality assessment review, we argued against taking away responsibility for overseeing established providers from an independent peer review process run by the QAA to a data-based verification process run by the funding councils.**

**We also continue to see strong value in the work undertaken by HESA.**

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,

**We do not favour increased involvement by BIS in determining the specific formula for allocating the Teaching Grant. This would increase the potential for political interference in institutional and subject-based funding decisions.**

**The decision to transfer allocation responsibilities to the new OfS, however, would depend on whether the new body operates as a genuinely arms-length**

**body from government. One of our concerns is that the new set up may facilitate a shift in criteria from one based on the costs of delivery to one based on the 'creditworthiness' of individuals, courses and institutions (ie link to the RAB charge). This would embed further inequality in the funding process.**

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.

**We are concerned about the proposal to bring in a light-touch regulatory regime for *all* providers. We continue to call for a stronger, more robust regulatory and audit regime for the for-profit higher education sector. This is to reflect the extra risks associated with these types of providers. We also fail to see how academic freedom will be strengthened (see para 22, p.60) by removing the criterion for an "academic community" as an essential element in regulations for degree awarding powers.**

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

**None. Student unions are a vital part of the collective voice of students and an important element in the autonomous landscape of UK higher education. In terms of external scrutiny, student unions are governed by boards of trustees, including external members, to oversee their activities. The government should leave the trustees to get on with their work.**

**As an aside, we reject the notion that the draconian and interventionist Trade Union Bill is designed to 'improve union practices and increase transparency about how funds are spent'. Instead, it is a blatant attack on trade unions and which will only serve as a strain on industrial relations and weaken the position of employees in dealing with intransigent employers.**

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.

**In general, we share concerns that the OfS may end up being more of a government-led body than one reflecting the interests of students. For example, there is no reference to the governance structure of the new body and to the importance of ensuring the collective representation of students and of staff within the new architecture. In fact, although the green paper claims to put students at the heart of the system, it mistakenly conceives them as supposed "consumers" in a "marketplace" rather than as active participants and partners in the education process.**

**We note that one of the duties of the OfS will be 'to respect the institutional autonomy of higher education providers and the academic freedom of their staff.' This is a limited and weak formulation of a principle which at the core of higher education, and need to be extended to include the following: [1] Freedom for academic staff to identify, design, and conduct research and publish their findings without interference from outside institutions or commercial bodies is vital in extending the UK's knowledge and understanding of emerging issues. [2] Staff must also be free to express their opinions about the institution where they work if leadership is to be held accountable.**

**We see a major tension between the duty of the OfS to 'respect' academic freedom and the marketisation agenda of the green paper. For example, the government's support for an expanded private sector will result in fewer institutional protections of academic freedom. Under pressure from private for-profit providers, we fear that the beneficial requirements laid on existing universities that prevent management interference in programmes of study, the nature of research groups and in the employment status of academic staff will rapidly dissolve in the interests of the so-called 'level playing field'. We, therefore, call for the legal protection of academic freedom be extended to cover staff in *all* universities and colleges across the UK, building on the 1997 UNESCO Recommendation on the Status of University Teaching Personnel.**

**The role of Privy Council in requiring that proposed institutional reform of 1987 Model Statutes comply with requirements to protect academic freedom has also been important in protecting academic freedom in universities that it covers. These provisions should be retained, and indeed extended to all universities and colleges.**

**In addition, alleged breaches of academic freedom should be investigated and adjudicated by a body similar to the Office of the Independent Adjudicator for students.**

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

Yes       No       Not sure

Please give reasons for your answer.

**Under the principle of co-regulation, universities already pay towards the cost of quality/regulatory bodies such as the QAA and HESA. The proposal in the green paper represents a further shift of resources from the taxpayer on to the universities themselves (i.e. to fund the new OfS). However, there is a potential tension between the subscription funding model (i.e. universities as potential 'customers' of the OfS) and the concept of the OfS as a quasi-government body' (ie something akin to a student-focussed HEFCE). Further clarity is needed on the governance structure of the OfS, including the key role played by staff and students.**

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.

**We consider it wholly inappropriate that the power to set tuition fee caps will rest with the Secretary of State rather than with the Westminster Parliament. It is vital that the fundamental issue of raising fees remains in the hands of parliamentarians.**

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

**See response to 22a.**

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.

**We do not support the proposals to deregulate the instruments and articles of government of higher education corporations. Given the patchy track record of providers with a for-profit corporate structure, we feel that the interests of students, staff and the wider public are best served by retaining restrictions on the capacity of HECs to become for-profit entities.**

**We are strongly opposed to the idea of removing HEFCE-funded providers from the scope of the Freedom of Information Act. FOI is an important transparency tool in higher education. Staff and students have used FOI requests to highlight issues of concern to students and the wider public, including vice-chancellors pay and perks, racial discrimination and scandals involving governing bodies. Public funding in higher education requires public scrutiny. Rather than 'levelling down', we call for the extension of FOI responsibilities to *all* higher education providers that receive any form of public subsidy or support (including those who receive SLC funding only).**

**Given the admission in the Green Paper that students face substantial "information asymmetries", i.e. they have very little information on which to make decisions about their proposed place of study, it makes no sense to exempt any provider from the FOI.**

## **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?

**In December 2014 the union issued a major policy statement entitled '*Seeing the bigger picture: the future of UK research and development*'. In this paper, UCU has set out a critique of the UK university research base, in particular highlighting the ways in which university research is under-funded, over-concentrated, and distorted by mechanistic methods for assessing and distributing funding. The policy statement puts forward a series of recommendations to improve the sustainability and diversity of the UK research base.**

**As a result, UCU is disappointed by the narrow nature of the current debate on the future of research funding: either a defence of the REF or the abolition of HEFCE and allocating both parts of dual support via a new body, Research UK. We believe that a fundamental review of research assessment and funding should examine *all* policy options, including:**

- **considering a minimum level funding for HEIs to offer some form of research environment, within which the resources exist for research and scholarship to take place both to support and inspire students;**
- **considering how research, scholarship and teaching can become properly integrated and mutually supportive processes in research and teaching assessment criteria;**
- **encouraging the maximum participation of all research staff in the assessment process;**
- **exploring how best to reward departments and research units that have developed 'good practice' on staffing issues;**
- **considering ways to increase the transparency of peer review processes; and**
- **exploring how best to ensure genuine open access of research publications.**

**The proposals in the green paper and the Nurse review fail to adequately address these wider issues. For example, while the green paper argues that "[R]esearch and teaching should be recognised as mutually reinforcing activities", the policies contained within it are likely to result in increased fragmentation. There needs to be serious and practical commitment to creating and sustaining greater synergy between teaching and research and we call for this to be one of the essential criteria in both the BIS technical consultation on the TEF and the Stern review of the Research Excellence Framework.**

**See also our comments on the relationship between teaching and research under Q10.**

Question 25:

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

**We are concerned that the block grant element of research funding may be raided by Research UK to fund particular initiatives and projects favoured by the Minister or by the overarching committee proposed by Sir Paul Nurse. We call for proper protections for dual support in the new institutional set up, including for the devolved administrations. At the moment, QR funding is administered differently in the four nations, whereas the research councils operate on a UK-wide basis.**

**Another issue concerns the future of the Higher Education Innovation Fund (HEIF) in England. This is currently funded and administered through HEFCE. Will this fund be transferred into Research UK?**

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

**A form of hypothecation may be necessary to protect the separate funding streams, particularly the more vulnerable block grant element. But details remain scant about the new institutional landscape. Further information is needed on the proposed changes to research funding, including the response to the Nurse review and the conclusions of Stern review of the REF.**

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?

**As a sector-wide organisation we will confine our comments to question b.**

**The main issues facing UK research are the significant underfunding of research and the structural embedding of casualisation in the form of contract research in the funding mechanisms. Research is already managed in a highly marketised manner, with the corresponding waste due to exceptionally high staff turnover, market game-playing etc. Science is a long-term project for society, yet it is managed in the most short-term way. Having more long term rather than short term research funding might remove some of the structural arguments for short term contracts for researchers, though it is recognised this is not the only reason for the ab/use of short term contracts.**

**Another issue is that the 2014 REF is probably unique in terms of its size, complexity and the proportion of *core* funding that is attached to the results. The consequence is that the REF is seen as 'the only game in town'. And while other countries have also gone down the research evaluation route, no-one has done so on the scale of the UK.**

**UCU policy is opposition to REF. It is a flawed and time consuming mechanism for allocating too little funding. It leads to discrimination, job losses and course and department closures, as well as stress and other mental health issues, bullying and harassment.**

**For many years we have pointed out that the REF and the RAE before it have had a largely detrimental impact on the HE sector and on staff in particular: for example, increasing workload pressures, creating unreasonable performance expectations on staff and exacerbating inequalities between different groups of staff (e.g. men and women). Similar trends have been reported in the academic literature on UK research assessment, including wider educational policy concerns. For example, studies suggest that the RAE has weakened rather than strengthened the links between research and teaching.**

**Academics have also highlighted the ways in which the RAE/REF have limited intellectual freedom and restricted the character, breadth and inter-disciplinarity of research. The assessment criteria has meant articles in mainstream journals are favoured at the expense of monographs or**

**interdisciplinary publications, while conventional approaches within the discipline are prioritised over the unfashionable or heterodox, for example, in Economics.**

**Part of the problem with the UK assessment system stems from the fact that 100% of core research funds are attached to the REF results. Another issue is the high degree of selectivity in relation to the REF star levels, e.g. 'world-leading' (4 star), 'internationally excellent' (3 star), 'recognised internationally' (2 star). Panel judgements, therefore, have a significant effect on departmental funding levels and the career prospects of individual academics.**

**The 2014 REF results showed a significant increase in the volume of 4\* outputs and consequently the funding councils opted for an increase in levels of selectivity between 4\* and 3\* research (NB: as widely predicted, 2\* research received no funding). These developments reinforce our concerns about the increasingly concentrated nature of QR research funding. We believe that we need to move towards a funding model that helps to sustain the diverse network of research activity across all levels and disciplines.**

**In short, we believe that the UK's uniquely 'high-stakes', winner-takes-all research assessment system needs major reform.**

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

**As mentioned above, the UK system is unusual in that high levels of selectivity are built into both project funding and the QR side. One option is to abolish the QR/REF process and to ensure that all HEIs with research degree awarding powers have some access to QR funding.**

**Another option is to reduce the selectivity between the various 4\*, 3\*, 2\*, 1\* REF grades. This may reduce the amount of preparation for the REF (e.g. dummy runs, REF transfer market etc).**

**At the same time, we are in no way convinced that replacing peer review with metrics is a viable option for assessing the quality of research. For example, the recent report (*The Metric Tide: Report of the Independent Review of the Role of Metrics in Research Assessment and Management*) argues that metrics are limited in their capacity to evaluate the quality of research.**

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

**We will be consulting with our members on this issue as part of Lord Stern's review of the REF.**

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.

**We find ourselves strongly opposed to the premises and 'reforms' offered by the Green Paper.**

**We would observe that the Green Paper starts with its conclusions, namely**

**that the solution to any perceived problems of the Higher Education sector is to be achieved by expanding opportunities for private providers to enter the sector, recruit students and bank UK government-backed tuition fees.**

**But these conclusions are not supported by evidence, and simply assumed.**

**The proposals are only coherent when understood that the sole aim is the implementation of a particular variant of Conservative doctrine which even Margaret Thatcher and Keith Joseph did not support, namely that the market is the best way to improve Higher Education teaching quality.**

**The evidence from the USA and the UK regarding the impact of private providers in Higher Education supports our contention that institutions which offer degrees to students must be directed by academic concerns first and foremost. The Green Paper ignores the role of academic staff, individually and institutionally, in designing and delivering courses.**

**The terms "quality" and "risk" are used throughout the Green Paper with no definition. Without a definition of what the policy is attempting to maximise and minimise, how can the proposal be meaningfully evaluated?**

**In HE, "quality" is necessarily multi-faceted, discipline-specific, and frequently, like "impact", can only be evaluated historically. "Risk" is defined in the referenced guidance for new providers, but this definition is limited to corporate risk, not the risk to students of following a degree that turns out to have low "quality", or the risk to the sector of the consequences of market stress.**

**We are also disappointed that the green paper fails to recognise some of the wider aims and purposes of higher education, such as enabling individuals to grow intellectually and to achieve personal fulfilment. Granted the rapid character of economic and social change in our society, it is arguable that such purposes are also more likely to enable graduates to succeed in the constantly shifting world of employment, than emphasis solely on what makes them 'employable' in any given field or moment in time. Similarly, there is nothing in the consultation document on the key role played by universities in shaping a democratic and civilised society.**

**Instead, the green paper is underpinned solely by an ideological 'vision' of higher education mistakenly imagining students to be 'consumers' purchasing a 'product' and seeking to maximise the 'return' on their 'investment' and on providers competing in a market driven by variable price and 'quality'. This represents an unhelpful and impoverished view of the purposes of higher education and poses a major threat to its ability to meet the real wider educational, cultural and economic needs of the country.**

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**