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 Peter Mandler

Organisation (if applicable):

Arts and Humanities Alliance
*   A federation of learned societies in the arts and humanities;
*   This submission has been endorsed by:

African Studies Association, UK; Architectural Humanities Research Association; Aristotelian Society; Association of Hispanists of Great Britain and Ireland; British Association for American Studies; British Association for Chinese Studies; British Association for Korean Studies; British Association for Slavonic and East European Studies; British Association for the Study of Religions; British Society for the History of Science; Council of University Classical Departments; English Association; Folklore Society; Linguistics Association of Great Britain; National Association for Music in Higher Education; Oral History Society; Royal Historical Society; Royal Musical Association; Society for French Studies; Society for the Promotion of Hellenic Studies; Society for the Promotion of Roman Studies; Society of Latin American Studies in the UK; Society of Neo-Latin Studies; Standing Conference of University Drama Departments; Theology and Religious Studies – UK; UK Council of Area Studies Associations; University Archaeology UK; University Council for Modern Languages; University English

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

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

x	Representative Body
	Research Council
	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?

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

□ Yes   □ No   □ Not sure

Please provide any further relevant evidence.

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.

In general we support efforts to raise teaching standards and improve student access to information about teaching, consonant with other recent government policy initiatives – e.g. NSS, KIS – and we would favour requirements for HEIs to be more open and reflexive about their teaching plans and provisions as a further step in this direction.   But this does not in our view require a new <u>regulatory</u> structure such as the TEF proposed here, which seems to us likely either to require a burdensome peer-review process like the REF (but with a far more difficult evaluative task) or a resort to metrics which do not in fact measure teaching and learning at all but other things (social selection, social and cultural capital, workplace experience, subject choice, career choice, etc.). Experience of the REF

and other regulatory structures suggests to us, too, that universities have already shifted under regulatory pressures too far from intellectual and pedagogical justifications for teaching and research towards justifications based purely on regulatory metrics. The indicator, which is simple and transparent, substitutes for good practice, which is complex, cultural and hard to measure. Thus there is a danger that the TEF, while seeking to re-balance an alleged over-emphasis on research, will simply extend damaging and/or burdensome practices from research to teaching. It will take a lot of care and subtlety to avert this outcome.

Any assessment of teaching must carefully distinguish – and it is not clear that <u>any</u> metric can successfully achieve this – between the characteristics of the student body, the different methods and goals of teaching in different disciplines, and different outcomes of teaching (for edification, self-improvement, and value at different stages of the life-course, as well as employment). For example, recent studies have suggested that students regard higher education as a consumption good as much as an investment good (see e.g. Beffy et al., Review of Economics and Statistics, 2012; Walker & Zhu, BIS Research Paper 112, 2013; Finnie, Higher Education Management and Policy, 2014; and the methodological critique offered by Ben Schmidt, 'Mind the Gap: Incomes, College Majors, Gender, and Higher Ed Reform', http://sappingattention.blogspot.co.uk/). The usefulness of the TEF to student decision-making will therefore inevitably depend on a very sophisticated understanding of student decision-making, aspiration and achievement, not an easy or as yet well-developed subject.

Particularly problematic is the relationship between education and employment. Even controlling for background and prior attainment, the evidence is that employment and income in employment are only very loosely and complexly related to teaching (see for example Liu and Grusky, American Journal of Sociology 2013: '[differentials in income are increasingly] a consequence of changing returns to workplace skills rather than, as is typically supposed, changing returns to skills learned or selected for in school').

We strongly believe therefore that to be useful to students and employers (and parents and citizens and regulators) the TEF must seek to assess teaching quality in ways that properly capture all the functions of education - pedagogical, intellectual, affective, cultural, social and economic. This will require due attention to fathoming (and accepting rather than seeking to engineer) student decision-making, assessment of patterns of learning as well as teaching, discipline-specific methods and goals, and the close connection between teaching and research that remains a distinctive feature of the UK HEI system at all levels. It seems likely that these aims can only be accomplished by means of narrative- rather than metrics-based assessment, and forms of peer review comparable to those currently employed in the REF.

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.

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?

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.

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

Timing?

☐ Yes   ☐ No   ☐ Not sure

Assessment panels?

☐ Yes   ☐ No   ☒ Not sure

Discipline-specific panels would be essential as the methods, aims, goals and outcomes of education in the different disciplines vary so widely. Speaking broadly, the arts and humanities are taught through fewer direct contact hours than the sciences and social sciences, but with more small group teaching, and aim first and foremost at developing independent learning, research, writing and presentation skills. The range of employment outcomes is much greater, direct links to employers thus necessarily rare, and there are few opportunities for professional accreditation even in practice-based courses. Even within the arts and humanities, structural differences between courses make them strictly incommensurable – we would draw particular attention to language courses, which require a year abroad (with consequent loss of direct control over teaching by the home institution, and as so often in our disciplines more emphasis on student self-reliance), and to practice-based courses which are notoriously difficult to assess in their own right, still harder in conjunction with dissimilar courses.

 and process?

☐ Yes   ☐ No   ☒ Not sure

Please give reasons for your answer.

Too few details of process are given to judge.

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.

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.

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.

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.

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.

In our view, the proposals are inconsistent with the Green Paper's own acknowledgements of the obstacles to employing metrics, and with HEFCE's review of the use of metrics in research assessment (*The Metric Tide*), even after 30 years of experience with research assessment.

As we suggest above, metrics based on employment and income on employment seem to us of very little use for this exercise.   Repeated studies have shown that, even controlling for background and prior attainment, data on employment and income give very little insight into teaching quality and learning gain (see Liu and Grusky 2013, cited above, and BIS's own research, e.g. Walker and Zhu 2013: 'we

are a very long way from being able to draw policy conclusions' from data on graduate earnings broken down by subject of study). Arts and humanities graduates typically have more diverse destinations, complex career paths, and very often a quite different set of cost-benefit calculations, which a TEF based on 'common metrics' would be unable to capture and would indeed run the risk of disrupting.   To take just one example, there are very striking differences in graduate premia on arts and humanities degrees between men and women, which reflect not the quality of their teaching (presumably more or less the same) but their historic standing in labour markets, different levels of disadvantage, and very possibly different patterns of aspiration as well (see for example Schmidt, 'Mind the Gap', cited above; Zafar, Journal of Human Resources, 2013; and Walker and Zhu, Economics and Education Review, 2011).   To take another example, there are considerable differences in returns to education between regional labour markets, and in the absence of perfect labour mobility it would be absurd to penalize universities for the performance of their graduates in less favoured labour markets.

Furthermore, for small subjects, DLHE data is generally deficient as acknowledged in Unistats itself.   For 90% of the Archaeology returns, the March 2015 Unistats snapshot reports, 'There are not enough data available to give specific information for the course…..the information may include data from previous years, or other courses at the institution in the course's wider subject area.'

Student satisfaction surveys also produce highly ambiguous results. Clearly, student satisfaction is not a measure of teaching quality. Indeed, there is evidence that greater emphasis on student satisfaction can sometimes perversely degrade teaching quality by focusing attention (among both students and managers) on fixed, measurable criteria at the expense of difficult or more innovative course characteristics. It has widely been observed that secondary education has become more standardized as teaching and learning to the test are prioritized. This development has its advantages - it establishes minimum standards – but it has its disadvantages as well – it has been responsible for grade inflation and discouraged curricular and pedagogical innovation. It also establishes very flat norms of student expectation. At present university teaching represents a comparative liberation from those constraints. There is a danger that these virtues will be lost if university teaching is policed by means of comparable metrics.

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.

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.

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

Question 13:

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

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.

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.

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

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.

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.

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.

We consider it of central importance that the dual-funding structure for research, which the Green Paper happily endorses, be mirrored in the higher education architecture.

First, because the two arms represent two different relationships to government – the research councils closer to government, the funding councils more fully autonomous.   This is particularly important to the arts and humanities, which receive 85% of their research funding from QR, not from the research councils.

Second, because while 'putting students at the heart of higher education' is a useful goal and a convenient slogan, it is not a good guide to the administration and regulation of the system. An 'Office for Students' cannot oversee postgraduate research or other research functions integral to the educational mission of universities. Nor can it take responsibility for other planning, infrastructural and research functions that are currently performed in the funding councils (and on which considerable expertise has been built up over a long period).

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?

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,

This question has little relevance to us as there remains little teaching grant available to the arts and humanities.   But it goes to the heart of our concerns about the architectural redesign expressed in our answer to (a) above, as the options presented suggest that government intends to intervene more closely and in greater detail in the allocation and expenditure of HE funds, which have for a century been deliberately and correctly kept at arm's length from short-term ministerial direction.

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.

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

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.

See our answer to q18 above.

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

☐ Yes   ☐ No   ☐ Not sure

Please give reasons for your answer.

Question 22:

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

☐ Yes   ☐ No   ☐ Not sure

Please give reasons for your answer.

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

Question 23: Do you agree with the proposed deregulatory measures?

☐ Yes   ☐ No   ☐ Not sure

Please give reasons for your answer, including how the proposals would change the burden on providers. Please quantify the benefits and/or costs where possible.

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?

See our answer to q18 above.

Question 25:

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

See our answer to q18 above.

b) Would you favour a degree of hypothecation to ensure that dual funding streams, along with their distinctive characteristics, could not be changed by that organisation?

☒ Yes   ☐ No   ☐ Not sure

Please give reasons for your answer

See our answer to q18 above. It would not be necessary of course to hypothecate if the dual funding streams were preserved in the regulatory architecture, as we recommend above.   We note that the Nurse Review has since recommended that the balance between the dual funding streams ought also to be protected from short-term governmental manipulation.

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 we note above, the arts and humanities rely heavily on QR – 85% of our UK government research funding derives from this source and only 15% from the research councils.   This is consistent with the greater prevalence of individual rather than team or laboratory-based research and the need for well-distributed infrastructure to support it (libraries, archives, museums, studios, study leave, small grants), and also with the more widely distributed nature of the research (less concentrated in certain types of institutions, with less obvious 'strategic' focus, requiring less coordinated prioritising).

To distribute QR widely and equitably, some mechanism such as the REF is clearly necessary. But there is a danger that, in pursuit of probably illusory cost-cutting goals, attempts to standardize and/or metricate the REF will sap its ability to assess and meet the needs of different disciplines appropriately.   There have been a few striking instances recently where attempts to standardize the REF have backfired seriously – e.g. the proposed universal application of Open Access standards based on STEM practices.

We look forward to the results of the Stern Review which we hope will find a means of retaining disciplinary sensitivity and the centrality of peer review while reducing the regulatory burden.   Finally we would reiterate the warning we offered at the outset under q2 about the dangers of adding through the TEF new regulatory burdens (and distortions of good practice) at just the time that a re-think of the impact of regulation is quite rightly being offered with regard to the REF.

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

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

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.

It would be useful for all such consultations to start with a box in which the submitting body can describe its specific remit and concerns (which might also explain why some questions can be more fully answered than others).

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