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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
	Representative Body
	Research Council
	Trade union or staff association
	Other <i>Learned Society</i>

***regret that the Green Paper falls far short of what is required. It is clear that much more time, resource and expertise are required before any TEF can be launched.***

***On the TEF, our principal recommendation is that the TEF procedure be put on hold until time, resource and expertise have been brought to bear and proposals developed which have some prospect of recognising existing strength and encouraging improvement.***

***On Widening Participation, our principal recommendation is that it is not coupled with any TEF, and that Widening Participation activity addresses differing levels of participation in specific disciplines, including in particular Mathematics.***

Before answering individual questions, we give (A) some general reflections about universities and (B) some comments on the Green Paper.

**A1. Universities have evolved over centuries as institutions that train professionals, preserve and develop scholarship, question philosophical and political assumptions and inspire and conduct research. Any major appraisal of activity such as that in the Green Paper needs to have this broad vision in mind.**

**A2. Teaching and research should not be seen as two mutually exclusive, competing activities. Researchers teach and teachers carry out research and scholarship, the same intellectual fire lighting all these activities; it is important that the dual funding model enables this. The balance between teaching and research will vary between individuals in a university. A key role for any TEF will be to ensure proper reward and recognition for excellent teachers, and that there are opportunities for career progression for those whose dominant activity is teaching.**

**A3. University teaching is important to society in handing on the torch of knowledge to successive generations, and in ensuring that individuals are equipped to work as professionals in traditional fields such as law and medicine as well as newer ones such as computer science and engineering. It also must ensure that those who play a leading role in public life have a historical and social perspective to inform any power they wield.**

**A4. University teaching thus has a utilitarian role, in a broad sense. The manner in which it is carried out affects not just what students learn but also their attitude to intellectual procedures, their ability to work autonomously and to develop and adapt after the end of their formal studies.**

**A5. Obviously the benefit of a university**

## **B The consultation**

**We reiterate that we welcome importance being attached to teaching. We believe that the commitment of UK universities to teaching, and to their students, is generally high, often beyond the level that might be expected given levels of funding. We regard it as essential that any TEF developed is able to recognise and reward good teaching and encourage improvement by encouraging reflection and sharing of good practice, rather than introducing mistrustful accountability, punishment and competition between institutions.**

**B1. We would like to offer our services to the attempt to develop a TEF that is effective and valid, particularly for the mathematical sciences disciplines. We believe that developing such a TEF could be valuable, but that it is a difficult task.**

**B2. A bad TEF is worse than no TEF. We call on you to delay the process and allow sufficient time for proper development, piloting and discipline-level procedures.**

**B3 Certain assumptions with which we do not agree seem implicit in this**

**there is a tension between pleasing students and the authority of a teacher to deliver what they judge to be appropriate; such content may be challenging, and make the learning process uncomfortable.**

**B9**



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.

*We do not agree with the proposals set out in paragraphs 26-                      Starting the*





Question 9: Do you agree with the proposed approach to incentives for the different types of provider?

Yes

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.

*The proposed metrics are not sufficient, calibrated or validated, and have not been demonstrated to be robust, see B4. The figures they will generate can be influenced by a number of factors other than teaching quality. Metrics can incentivise game-playing and perverse behaviour. An example of this may be seen in GCSE/School league tables where disproportionate resources are concentrated on students at the C/D boundary.*

*Peer evaluation, as in the REF, is also essential. There must be scope for academic judgement.*

### **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.

*The proposals do not address different levels of participation in different disciplines. Mathematics is a significant subject here, because A-level Mathematics is key to gaining entry to many highly regarded and rewarded courses, as well as successful study. The importance of Mathematics extends well beyond The*

*still at school, both to inform subject choices at GCSE and A-level and to increase prior attainment.*

*There are some disturbing features of the current arrangement, such as the levy of £900 for widening participation from each student fee at the £9000 level. This appears to be a levy from those who do pay fees; it is not clear that this is a*



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.

*It is essential to have contingency planning for the failure of a start-up university.*

## **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 believe the organisations listed in Part C, Chapter 1, item 5 [BIS, SLC, HEFCE, OFFA, QAA, HEA, HESA, Office of the Independent Adjudicator (OIA) and UCAS ] have distinct and useful roles and we do not believe that the proposed restructuring will improve things. As well as being costly, such restructuring will not be as effective as reviewing the role of the various organisations involved, including possible rationalisation. (The list should also include the DfE and the NCTL, given the role of universities in teacher training and the need for coordinated work by BIS and DfE in Widening Participation policy.) Moreover, the impracticality of combining, or placing under a single umbrella, a number of organizations, some of which are UK-wide in their coverage and som*

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

Disagree

Not sure

Please give reasons for your answer,

*Such decisions should not be political. [Two is the better option, but expertise built up by HEFCE must be used, and further expert advice sought.]*

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.

*We distrust the structures being proposed and hence their role. However we accept that some arrangement may be needed.*

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

*No comment*

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.

*No comment*

### **Reducing complexity and bureaucracy in research funding (Part D)**

Question 24: In light of the proposed changes to the institutional framework for higher education, and the forthcoming Nurse Review, what are your views on the future design of the institutional research landscape?

*We do not support the bringing of the two branches of the dual support system under the control of one body. Our reasons are laid out in answers to Qn 25.*

Question 25:





*the UK HE sector, and for the quality and volume of research in the UK, that it is not only preserved, but that the structures supporting its implementation make its existence and operation transparent and robust.*

**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.

[LMS response to BIS House of Commons Select Committee inquiry on 'Assessing quality in Higher Education'](#)

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