Text of the letter of 14 January 2016 to Jo Johnson MP, Minister of State for Universities and Science from the Vice-Chancellor

The University of Oxford has today submitted its response to the consultation on the Higher Education Green Paper, “Fulfilling our Potential; Teaching Excellence, Social Mobility and Student Choice.” My colleagues and I hope that our comments, along with those of peer institutions, will help in developing and refining the government’s approach to the important issues the Green Paper seeks to address.

I would also like to take this opportunity to make some wider reflections prompted by the document.

We welcome the emphasis in the Green Paper on the student experience. The quality of that experience lies at the very heart of Oxford’s position as a world-leader in education. The intensive small group teaching that characterises an Oxford education is key to its effectiveness. Like tens of thousands of Oxford students, past and present, you have generously acknowledged and celebrated that fact. We believe it to be imperative that any systematic approach to measuring and promoting teaching excellence must be able to capture the success of this model.

Another valuable aspect of the Oxford student experience is the opportunity for students to engage with outstanding academics in their field, who combine teaching with a distinguished research career. It is sometimes assumed that the student is the sole beneficiary of this arrangement but many academics readily acknowledge the intellectual stimulation it can bring to their own research. It is so important that the understandable effort to assess effectiveness not lose sight of the intangible and less easily quantifiable elements of excellent teaching.

We are also concerned at a possible and deleterious separation of research and teaching. In Oxford’s case, the fourth year of many of our undergraduate degrees consists entirely of research. Nearly half our students are studying towards postgraduate qualifications and over a quarter of our students are working towards a doctorate. Increasingly a postgraduate qualification is the necessary bridge not only to a career in academia but also to a good job elsewhere. For all these reasons and more, research and education are strongly linked. We believe it is critical to foster teaching and research as interwoven rather than separable. We encourage government, as part of the commitment to teaching quality, to work with us and others to develop new ways of strengthening this virtuous circle to the benefit of all aspects of academic endeavour.

It goes without saying that a well-funded university research environment is vital to support first-rate teaching as well as research. We commend the government’s efforts in this direction and encourage it to go further by matching the commitments of many international competitors.

Another area of major importance is the way in which research money is allocated and we welcome the continued support for dual funding in the Green Paper. In these straitened times we understand the interest any government must have in ensuring value for public money but we are worried that short term goals may undermine long term aspirations and would counsel against a narrow understanding of public benefit or one that may result in funding patterns which stifle the “blue-skies” spirit of young people of talent. It has been demonstrated over and over again that the uncharted can be the richest terrain for valuable discovery.
For most students, the Green Paper’s attention to the regulatory architecture of higher education may seem remote and even unimportant, given its declared focus on the student experience. But to the extent that the architecture shapes the freedom of an individual institution to function in a way that best serves its students and its academic mission, it is a matter of considerable importance. We believe that any effective regulatory framework must sustain and promote institutional diversity of a kind that meets the varied academic aspirations of students. We take this to be the real meaning of student choice and a key test of proposals in this sphere.

We share the government’s commitment to widening access to higher education. No university has invested more heavily than Oxford in increasing student access. It is something to which we are passionately committed for reasons both of equity and mission. Simply put, we are interested in attracting the best students. We know that if Oxford is to maintain its pre-eminent position it must attract the most talented students regardless of background. It is squarely in this context that we seek to evaluate all initiatives to improve social mobility through higher education, including those in the Green Paper. We know how challenging it is to make progress in this regard while also maintaining educational excellence. So our question about all such initiatives is a simple one: are they likely to work?

As an institution that is home to some of the best social scientists in the world, we believe that successful public policy decisions must be based on sound empirical analysis. The idea of using tuition charge levels either directly to incentivise teaching quality, or indirectly to boost widening access for students is untested. Frankly, we are not persuaded by the proposed link to teaching excellence assessments. Both high-quality teaching and fair access are vitally important to current and prospective students as well as to our universities but it does not follow that linking them directly in this way is in the long-term student interest. While we can applaud and share the aspiration therefore, we remain sceptical about the proposed means.

Our experience suggests that the most effective approach to student access is likely to vary widely from institution to institution, just as the range of student needs and the particular character of individual institutions varies. At Oxford, for example, we have found that the summer schools we run for students from state schools have been remarkably successful in attracting students from groups that are traditionally underrepresented at Oxford. The proportion that goes on to make successful applications to Oxford is impressively, and disproportionately, high; the success rate for those who have attended a UNIQ summer school and apply to Oxford is nearly twice the average. We also consider these programs a success if participants are not admitted to Oxford but go on to attend other selective universities previously thought beyond their reach.

This letter makes no pretence at being a comprehensive review of the issues in the Green Paper, and there is a great deal more detail in our consultation response, but I do hope it provides some useful additional reflections.

I look forward to discussing with you in greater detail how we can work together in the best interest of current and future students, a cause to which I know we are both strongly committed.
Introduction

What is your name?

Name: Helen Watson

What is your email address?

Email: helen.watson@admin.ox.ac.uk

What is your organisation?

Organisation: University of Oxford

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

Please tick the category that applies:

Higher Education Institution

Public Sector Equality Duty

1a What are your views on the potential equality impacts of the proposals and other plans in this consultation?

Please type your answer in the answer box:

The Consultation refers to the difficulty of taking forward an equality and diversity analysis of the proposals contained in the Green Paper given the scarcity of adequate relevant data. We note, however, that two reports in particular - BIS Research paper No. 186, Socio-economic, ethnic and gender differences in HE participation (University of Warwick and Institute for Fiscal Studies) and Background to Success, Differences in A level entries by ethnicity, neighbourhood and gender, (Pam Sammons, Katalin Toth and Kathy Sylva, University of Oxford Department of Education) contain useful analysis:

• Both reports note the important role of background in shaping progression to higher education, particularly gender, ethnicity, geographical area, family disadvantage and ‘place poverty’ related to the local neighbourhood in which students live.

• It is important to understand the complex interactions between these factors in order to determine the equality impact of the proposals.

We believe the current equality analysis could go further in this respect. For example:

• Amongst the cohort of students who sat GCSEs in 2008 [the most recent date for which progression data is available], all ethnic minority groups are now significantly more likely to progress to University in general, and to attend a selective institution, than their otherwise-identical British counterparts – and these gaps in participation by ethnicity are widening. They are also larger for ethnic minorities who speak English as an additional language and who live in London. For example, Indian pupils in the top socio-economic quintile and Chinese students in the top two quintiles have the highest participation rates in higher education - above 80%, and only Black Caribbean and other Black pupils are still less likely to attend a selective institution.

• White pupils born to British parents from the bottom two socio-economic quintiles have the lowest participation in HE in general, particularly boys – fewer than 2% of white boys from the lowest socio-economic group attend the top one third of HEIs.

• Two thirds of those in the bottom (socio-economic) quartile attend University in the same region as they live, compared to one third of those in the top quintile.

It is therefore clear that:

• The provision of greater information on teaching quality will not in itself address the broader structural, socio-economic, attitudinal and geographical barriers to equal participation in higher education [and that widening participation for certain groups, and ensuring excellence of teaching across all institutions are different agendas which need to be tackled separately and not be inter-dependent].

• Separate targets for participation by minority ethnic students and those from lower socio-economic groups will not address the complex interactions between these different factors.

• High level targets for the sector as a whole, or any targets imposed by a regulator will not be effective in enabling institutions to address local issues of under-representation, which vary by institution and subject mix.

• We are also concerned by the assertion in the equality analysis (citing BIS internal evidence) that information barriers are faced primarily by women and ethnic minorities. Women are proportionately more likely to participate in higher education than men; and the lowest rate of participation is among white boys from disadvantaged backgrounds. If the proposals will particularly benefit women and minority ethnic students, they will further widen the very large pro-female gap in participation, and the gap between the highest achieving minority ethnic students and the lowest achieving group of white boys.

1b Are there any equality impacts that we have not considered? Please provide any further relevant evidence.

Yes

Please type answer in text box:

The Consultation does not consider the impact of the proposals on the progression to higher education of students with a disability who are the most likely overall to report dissatisfaction with their study.
The focus of the Consultation on UK students and on social mobility in the UK does not allow for consideration of the complex relationships between ethnicity, nationality and social background, within an international system which attracts large numbers of high quality overseas students. The Consultation is framed solely in terms of employability outcomes and does not consider the likely impact of the proposals on the progression of under-represented or disadvantaged groups to graduate education, in particular taught Masters’ courses, including professional courses. We would also note that there is no mention of part-time students in the Green Paper. Part-time study is acknowledged as an important route to study for students from non-traditional backgrounds in the 2011 White Paper.

Teaching Excellence Framework (TEF) (Part A: Chapters 1-3)

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.

Please type your answer in the text box:

We support the stated aims of the TEF (in paragraph 3 of chapter 1.) However, we are concerned that the TEF, as currently conceived, will not achieve these aims, and that as a result, the costs of the TEF would outweigh its benefits. For example, we do not believe that the common metrics proposed will help students ‘to judge teaching quality across courses and disciplines’. The metrics identified, while providing useful information are not, in themselves, reliable indicators of teaching quality, and need to be carefully contextualised if they are to help applicants make sound and well informed choices about what courses and institutions to apply to.

Furthermore, while more information at institutional level on quality of teaching may help some students differentiate at the margins between different institutions, BIS’ research, reported in Research Paper 186, indicates that the overall course choice of certain disadvantaged groups is more likely to be determined by earlier choices made in schools on subjects to study at Key Stages 4 and 5, and influenced by careers and other guidance. It is here that more focus should be being given.

Nor will the common metrics help employers to ‘identify and recruit graduates with the skills they require’. The employability skills that students acquire and on which employers make their appointment decisions are developed in a number of ways, including through academic courses, modes of teaching and learning, extra-curricular activities, programmed careers skills sessions, internships and other professional placements, and part-time work.

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? Please give reasons for your answer.

No

Please type your answer in the text box:

We agree that the aims behind the TEF should apply to all HE providers, for the benefit of all students. However, given our reservations about the effectiveness of the TEF, as currently conceived, in meeting those aims, we do not support such a general ambition for the TEF. Furthermore, we believe that it needs to be tested and the costs and benefits evaluated before any extension beyond the UG level.

We would also note that PGT tuition fees, being unregulated, are able to respond to market forces, acknowledging that the ability of these to recognise quality in teaching and other academic goals is not a settled matter.

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?

Please type answer in text box:

We are concerned that the TEF and WP should not be conflated in ways that do not best serve the interests of students from disadvantaged backgrounds. The promotion of teaching quality and the promotion of widening participation in HE are two very different policy challenges that require different types of response and intervention by institutions.

Furthermore, as stated above, we do not believe that access to more information is likely to have a significant effect on access to higher education. The evidence base shows that student choice of both course and institution is primarily a reflection of the student’s background and characteristics, with course choices and progression to HE being affected by socio-economic background, cultural and social norms and aspirations.

We agree that an approved Access Agreement could be a pre-requisite for a TEF award at level 1, on the clear understanding that the powers currently available to the DfA should not be extended, as suggested, to setting targets for particular providers (see response to Q12). We believe the introduction of such new powers would pose a direct threat to institutional autonomy.

5a Do you agree with the proposals on what would constitute a ‘successful’ quality assessment (QA) review?

Yes

5b Do you agree with proposals on the incentives that should be open to alternative providers for the first year of the TEF?

Yes

5c Do you agree with the proposal to move to differentiated levels of TEF from year two?

No
Please give reasons for your answers to question 5

Please type your response in the text box:

5a) We agree in principle with the criteria for a successful QA review, on the understanding that the threshold for the HER (i.e. meeting or exceeding expectations) applies on an equivalent basis for earlier versions of the HER e.g. Institutional Audit and IRENE, given that a number of institutions (like Oxford) will not have had a HER report by end of February 2016.

A general concern we have about the proposals in the consultation document, including the interplay between TEF and QA, is the complexity involved and the implications that this is likely to have for institutional workload. It will be essential that the TEF and QA exercises are fully aligned to avoid confusion, duplication and unnecessary additional work (see response to Q7).

5b) The option of enabling alternative providers to access equivalent uplifts to the fee loan cap, providing quality can be demonstrated, would seem more streamlined than commencing operation of the intended AP Performance Pool for a presumably time limited period.

5c) We agree that it would not be sensible to move to differentiated levels of TEF before year two. However, whether it makes sense to move at that point to differentiated levels will depend on the purpose and mechanics of differentiation, and on the methodology for assessment (see also response to Question 8), and so these questions cannot be fully responded to in advance of the technical consultation.

We support the notion of informed decision making, and support the aims behind the CMA guidance on clear and accurate information for prospective applicants. But we do not think that a compelling case has been made for a differentiated system. We think it could lead to a very cumbersome machinery that would generate significant costs for institutions and little gain for students. It would also add to the cost of running the regulatory body, a cost that the government proposes should be passed on to the sector.

We are also concerned that a differentiated system could lead to a public perception of underachievement or failure, which would be very damaging to the individual institution and to the reputation of the sector as a whole, in the UK and particularly overseas.

6a) Do you agree with the proposed approach to timing of TEF assessments?

Not Sure

6b) Do you agree with the proposed approach to TEF assessments panels?

No

6c) Do you agree with the proposed approach to TEF assessment process?

No, Not sure

Please give reasons for your answers to question 6

Please type your response in the text box:

We cannot properly comment on the overall approach without having a better idea of how it might work in practice. While the proposed technical consultation will be very important in considering the detail, it will also be essential to have a period in which the new system is tested.

6a) As stated above, we are concerned to be clearer about the relationship between the TEF and QA regimes. We agree that the TEF assessment should be valid for at least five years, for planning stability. But we also think that there will be a need to align the rolling cycle of QA reviews and rolling cycle of TEF assessments, both in their timing and in the metrics to be applied. Institutions should not be required to duplicate work or effort required for the QA process in the TEF assessment process.

6b) We believe that research-active academic staff should play a leading role in making assessments, whether at institutional or subject level. We agree that academic staff involved in subject level assessments should have relevant subject expertise. We do not believe that it would be appropriate for assessments to be made by ‘academic experts in teaching and learning’ if that is understood to mean education professionals in the broad sense.

We also have serious reservations about the inclusion of employer/professional representatives on panels set up to assess teaching quality. We accept that employers and professional representatives have an important contribution to make in ensuring that the intended learning outcomes of particular degrees reflect the competences, skills and knowledge required by industry, the professions and the broader economy. But we do not believe that teaching quality can be judged by particular student academic outcomes.

6c) We are concerned that every effort be made to minimise the cost, time and bureaucracy involved in setting up and operating the assessment process. We therefore agree that there should not be a routine visit.

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.

Please type your response in the text box:

In the absence of much of the operational detail about the TEF, which is yet to be worked out, we can only respond in broad terms. To minimise cost and administrative burden, we would expect to see:

- Alignment of TEF and QA regimes e.g. in assessment methods and cycles, use of metrics, collection and reporting of data etc;
- Alignment with other statutory reporting requirements e.g. HESA
- A risk based approach to QA and TEF e.g. longer intervals between assessment for higher levels of TEF award;
• Efforts to simplify the machinery of TEF assessment e.g. common evaluation of common metrics where subject level evaluation is not necessary e.g. NSS scores.

8 Do you agree with the proposed approach to differentiation and award as TEF develops over time? Please give reasons for your answer.

No

Please type your response in the text box:
We have expressed our reservations about the merits and purpose of differentiation (see response to Q5).

We do not see a scale of three or four levels as being ‘simple’, and we are not clear on what basis differentiation would be made between different levels e.g. different metrics or different standards of the same metrics. We are concerned that considerable judgement would rest on the assessment of institutional qualitative statements by panels, and that there would be sizeable scope for challenge by institutions. A similar concern applies to the method to be used for aggregating subject assessments into an overall institutional score, e.g. what weight would be attached to different metrics at subject level, and what weight attached to different subject scores to arrive at an institutional score. Apart from the risk of legal challenge and administrative cost, such a system could lead to gaming and unintended consequences.

It is not clear to us how the proposed system of financial incentives is intended to function. If, as seems possible from a reading of the proposals, the different levels of award are to work within a narrow range of tuition fee caps, based on inflation adjustments, the cost to institutions of seeking a higher level of award, in additional data collection, monitoring and reporting, could well be greater than the financial gain.

9 Do you agree with the proposed approach to incentives for the different types of provider? Please give reasons for your answer.

Yes

Please type your response in the text box:
Enabling providers with DAPS or specific course designation to access equivalent uplifts to the fee loan cap would seem a more reasonable preparation for the single route into HE than retaining the intention to implement the AP Performance pool from 2016/17. We appreciate that a logical outcome of the introduction of a single route into HE would be uplifts to the fee cap for providers with fees capped at the higher rate. However, we note that the implication that the loan cap might be raised from £6000 for students studying at institutions which have chosen to charge uncapped fees seems to work against the government’s commitment to social mobility.

10 Do you agree with the focus on teaching quality, learning environment, student outcomes and learning gain? Please give reasons for your answer.

Not sure

Please type your response in the text box:
We believe that the main focus of a TEF should be on teaching quality which, research has shown, is intrinsically bound up with how an institution encourages and enables students to engage effectively with their studies (see below).

As the document states, a main purpose of the TEF is to ‘help institutions improve the quality of their teaching by highlighting exemplary practice’. We believe that the TEF must seek to encourage those institutional behaviours and processes that are known, based on research in the UK and elsewhere, to support effective learning and help students to meet the learning outcomes of their course.

The starting point must be a definition of teaching excellence that is pedagogically sound. Research (see Graham Gibbs’ Dimensions of Quality) indicates that teaching excellence occurs when certain key processes are in place. Chief among these are: frequent contact with academics in and out of the class; cooperation and collaboration with other students; active involvement of students in thinking and learning; and timely, specific feedback.

Teaching excellence is thus multi-dimensional. If it is to support widespread improvement and enhancement in teaching quality, the definition cannot be reduced to a single or a narrow set of metrics. We recognise that several of these defining characteristics may not be easy to measure. But we do not think it would best serve the student interest if a TEF were to rely on various input or output metrics that are not sound measures of teaching quality.

It must also be recognised that modes of delivery in teaching vary substantially between institutions and that that diversity should be respected. At Oxford the primary mode of teaching at undergraduate level is the tutorial system and small group teaching, supplemented by lectures and classes and delivered by research-active academics. This combination of learning modes, in the context of research-led teaching, delivers sustained contact between students and tutors, which promotes critical and independent thinking and the regular production of written work. We believe that this is an excellent model for developing students academically and in terms of transferrable skills, but we accept that it is not the only way in which a high quality learning and teaching experience can be delivered.

Some of these considerations are captured by the ‘teaching quality’ aspect and the criteria outlined in paragraph 7. However, the ‘learning environment’ and the ‘student outcomes and learning gain’ aspects are more focused on inputs and outcomes, and as such are less reliable proxies for teaching quality. Furthermore, the possible criteria for ‘learning environment’ do not identify the most important inputs, which include quality and quantity of learning and teaching development support resources available.

We recognise the importance for students of ‘student outcomes and learning gain’ in thinking about value for money and return on investment. However, as the document accepts, a valid, reliable and workable measure of learning gain has yet to be developed and tested. Student outcomes alone may say as much about the entry requirements of an institution as they do about the value-added by higher education. Any use of employment destination data must be interpreted in the context of subject mix, socio-economic profile of the student population and geographical location of the institution. Similarly, any use of earnings data runs the risk of placing a greater value on some professional level roles than others.
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? Please give reasons for your answer.

No

Please type your response in the text box:

Education and research are central to the identity, purpose and character of research intensive universities like Oxford. We believe that both of these dimensions must be part of the responsibilities of the regulator that oversees the governance and financial health of universities as autonomous institutions in the HE sector (see response to Q18).

For similar reasons, we consider it essential that the TEF captures what is central to teaching excellence in research intensive institutions which is the close and mutually beneficial relationship between teaching and research. While the benefits of research led teaching fall within the ‘teaching quality’ and ‘learning environment’ aspects as articulated in the document, they are not captured at all by the proposed common metrics. It will be very important that the assessment process, through the institutional evidence to be provided, is able to give proper weight to this key part of the education provided by research intensive institutions.

We have stated in our responses to Q2-8 our concern that the TEF should not add to the regulatory burden on institutions. For this reason we would support the use of metrics that are derived from extant data held in national databases.

That said, we believe that any common metrics should be suitably benchmarked and should be strongly supplemented by appropriate contextual information supplied by the institution. The types of evidence to be provided and the criteria to be applied in judging that evidence will be key in ensuring transparency and equity of treatment. However, it is also the case that the provision of such additional contextual information itself adds burdens to individual institutions and then requires the judgement of expert panellists.

Social mobility and widening participation (Part A: Chapter 4)

12a Do you agree with the proposals to further improve access and success for students from disadvantaged backgrounds and black and minority ethnic (BME) backgrounds? Please give reasons for your answer.

No

Please type your response in the box provided:

We strongly support the principle of further improving access and success for students from disadvantaged and ethnic backgrounds. However, we do not support the proposals put forward to achieve this aim and in particular we do not support the suggestion that there should be new powers to set targets for institutions. We value our current informed dialogue with the Office for Fair Access and believe that provides a fair and challenging way of setting institutional targets. We believe it must be recognised that:

• each institution needs to consider locally the complex interactions between socio-economic disadvantage and ethnicity in relation to the potential pool of candidates capable of making a competitive application to that institution;
• highly selective universities must retain the fundamental right to set demanding academic entry requirements and to select on the basis of carefully assessed academic potential and prior attainment; and
• active, evaluated, and reported engagement by universities with schools with the potential to enable students from disadvantaged and BME backgrounds to make competitive applications, along with targeted bursary support for successful applicants are sustained ways of improving applications by and retention of these groups. Responsibility for generating the targets that relate to this must sit with universities in order to generate a whole-institution approach.

Furthermore, we strongly support in principle the proposal to encourage and support more under-represented groups into higher education. However, any proposal to increase participation in higher education of these groups must recognise the need also to address, where it exists, their educational under-attainment at earlier stages (including, but not limited to Key Stages 4 and 5), and to ensure access to relevant and informed guidance on applying to higher education.

We are committed to ensuring a fair admissions process, and put very considerable effort into the process by which applicants are selected for interview and the interview process itself. Given that we interview all selected applicants before offering undergraduate places, we would not be able to operate a fully name blind admissions system. We also believe that the availability of contextual data is extremely valuable in supporting widening access to higher education.

12b Do you agree that the Office for Students should have the power to set targets where providers are failing to make progress? Please give reasons for your answer.

No

Please type your response in the text box:

We welcome the government’s commitment to improving fair access. We have set stretching targets in our Access Agreement. However, we do not support any proposal that the new OfS should have new powers to set targets. In our view, such a power would breach institutional autonomy, which is and must remain a cardinal principle of the HE sector in the UK.

Moreover, each institution needs to analyse its own contextual data, including the complex interactions between ethnicity, gender, socio-economic background and prior attainment and set targets which are stretching but appropriate and realistic for the institution. No external body can conduct that sophisticated contextual analysis and determine targets which take account of individual institutions' context and priorities. We believe it is important that institutions should draw on advice from student representatives when drafting access agreements, since they are often best placed to gather evidence and feedback from students who have experienced access barriers.

12c What other groups or measures should the Government consider?
please type your response in the text box:
For the reasons set out in our responses to 12a and 12b, we believe that each institution is best placed to set appropriate targets. We do not believe that targets can or should be set centrally by government. The evidence indicates that targets are most effective where they are set locally following extensive consultation with those who will be responsible for meeting the targets.

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

Please type your response in the text box:
We believe that access to more comprehensive contextual admissions data could assist institutions in the development of, and evaluation of the impact of, access initiatives and programmes. We believe that there is scope for more collaboration within the sector between bodies funded by the sector, such as the Higher Education Data Tracker (HEAT) and UCAS in the sharing of such information.

13b What additional administrative burdens might this place on organisations? If additional costs are expected to be associated with this, please quantify them.

Please type your response in the text box:
Access to additional data could require an increase in data management and analysis capacity in institutions but the benefit is expected to outweigh the cost.

Opening up the sector to new providers (Part B: Chapter 1)

14 Do you agree with the proposed single route into the higher education sector? Please give reasons for your answer, including information quantifying how the potential cost of entry would change as a result of these proposals.

No

Please type your response in the text box:
As the consultation notes, English universities have a global reputation. These proposals seek fundamentally to change the overall shape of the sector, rapidly removing external distinctions between different types of providers which already may not always be apparent, particularly to those from outside the UK. Inevitably, the robustness of the measures to recognise independent providers and their stability will have an impact on the reputation of the whole sector.

We are concerned by the statement that the Government wishes to put in place processes which enable providers to enter the sector ‘without… [needing] to spend time building up a track record.’ The prime track record which should be taken into account is that related to quality, and that can only be demonstrated through entry standards, student achievement and the quality of student experience on offer, assessed consistently over a number of years. The high quality of degrees offered by the UK’s publicly funded universities is assured, broadly, through the peer-review tradition of the academic community. This community does not exist in the same way in an environment where courses are delivered primarily by staff contracted for teaching by the hour. There is therefore a greater risk that concerns governed by the need to compete for students on the basis of price and to cut costs to maximise profit will hold sway. In such an environment, stronger external controls on quality are required than in a self-critical academic community. In summary, we believe that the proposals imply an equality of provision between universities with long histories and recent entrants into the sector which does not exist. There is a risk that the reputation of the sector as a whole will be diminished.

There is no recognition in these proposals of the relationship between the overall quality of the student experience and student outcomes. Teaching quality is a partial measure but is not sufficient in itself. The proposals to lift the restrictions on the size of the student body for alternative providers give no indication of how entrants to the sector with very small numbers of students will ensure an inclusive and supportive environment, guaranteeing a variety of experiences for all students.

A consequence of these proposals will be a call on the student loan book from an ever broader range of providers, including up to a maximum of £9k plus TEF-related inflationary increases. It is crucial that greater understanding should be developed of differential earnings between graduates from publicly funded and alternative providers ahead of any such liberalisation of the regime. There are likely to be consequences for the RAB charge which may in turn lead the government to further reshaping of repayment terms, to the detriment of all graduates. An essential element of information for potential students is the level of ‘graduate premium’ which may be derived from the course of study they follow or the institution at which they choose to study.

15a Do you agree with the proposed risk-based approach to eligibility for degree awarding powers (DAPs) and university title? Please give reasons for your answer.

Not sure

Please type your response in the text box:
We would support the proposals to finesse the approach to renewal of degree awarding powers. We agree that all predominately degree-level providers should be able to make a case for DAPs, provided that the assessment process introduced is rigorous. It could be argued that the Privy Council step adds little to the current process. It should be remembered, however, that a change to the role of the Privy Council would need to be reflected in amendment or repeal of elements of the Universities of Oxford and Cambridge Act 1923. We would expect to be consulted further about the details of any such change before it is made.

We are concerned by the implication in paragraph 10 that these changes will enable a lower bar for entrants. The faster track route and the vague nature of the statement that ‘We will also consider introducing more flexibility on what constitutes track record…’ are matters of significant concern, bearing in mind the potential for reputational risk to the sector as a whole.

The current student numbers criterion for university title was only introduced in November 2012. Previously, institutions applying for university title had to have at least 4,000 full-time equivalent higher education students, of which at least 3,000 were studying for a degree. The last Government’s Technical Consultation on
the white paper Students at the Heart of the System considered this point. At the time, Oxford University observed that “an excellent University education provides the opportunity to explore ideas beyond narrow subject boundaries in an academic community. This is not to say that a small, specialist institution cannot provide an excellent educational experience of another sort but that it is simply not synonymous with a University experience. The latter depends on the interaction of a range of different subjects studied at different levels, and the multiple perspectives this brings.” Critical mass is necessary to ensure that an inclusive and supportive environment, which guarantees a variety of experiences, can be accessed by all students.

15b What are your views on the options identified for validation of courses delivered by providers who do not hold DAPs?

Please type your response in the text box:
If there is evidenced concern that validation agreements can be highly variable, moving validation to a unified body would seem to be a reasonable solution.

16 Do you agree with the proposed immediate actions intended to speed up entry? Please give reasons for your answer.

No

Please type your response in the text box:
It is not clear why a clear priority for the Government should be to widen the range of higher education providers. There are risks in such an approach: the efficiency of the sector is likely to be compromised if large numbers of student places remain unfilled and the variability of the student experience is likely to become wider. The removal of the student number cap means that established providers are already able to grow according to their institutional strategies, provided that student demand is there.

A probationary design period seems a reasonable step, and it also seems reasonable that providers should not be constrained by HER ‘windows’. However, the requirement that courses should be delivered for at least a year before assessment seems a necessary quality assurance step.

Provider exit and student protection (Part B: Chapter 2)

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? 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.

Yes

Please type your response in the text box:
The risks that the Government has introduced into the sector, particularly through its student number policies and encouragement of alternative providers into higher education, necessitate arrangements to be put in place in case institutions fail (or ‘exit’). We agree, therefore, that contingency arrangements need be put in place to protect students. We would hope that these might be proportionate to risk assessed at individual institution level so that institutions which are demonstrably sustainable are not required to put extensive and unnecessary contingency plans into place.

Simplifying the higher education architecture (Part C)

18a Do you agree with the proposed changes to the higher education architecture? Please give reasons for your answer.

No

Please type your response in the text box:
The leading Universities in the UK and internationally are research-led Universities. The strength of these institutions comes from the integration of research, education and knowledge transfer. We agree that there are currently too many separate bodies and some mergers could lead to efficiency and greater clarity. However, of the nine Government and sector owned bodies with a core role in the higher education architecture, HEFCE is the only non-government organisation with responsibilities across both teaching and research. To break the governance links and to introduce an apparent split of teaching governed by the OfS and research by another body seems a potentially damaging move. The three elements of research, education and knowledge transfer are intrinsically linked and there have been benefits of having a single body oversee all three – delivering infrastructure through the likes of Jisc that support and enable research and teaching, developing data analytics that can inform policy on any of the three areas and to balance funding appropriately. While the OfS has the student at its focus, for postgraduate students in particular the tensioning of teaching, research and knowledge exchange is essential. If we are to increase our productivity, develop entrepreneurs of the future, and build a better skilled workforce the relationships between research, education and knowledge exchange must be kept strong and intact.

The proposal that HEFCE should be disbanded also brings with it a range of practical problems:
• There is no indication what will happen to current funding streams which cut across research and teaching (HEIF, Museums and Libraries, Catalyst etc) and there seems to be no mechanism for funding for future government initiatives which might cut across both research and teaching agendas
• HEFCE is the major funder of Jisc, the UK’s expert body for the use of digital technology in education and research. This includes services such as the high-bandwidth network, cyber-security that protects the sector, negotiations with publishers on shared licensing deals and open access issues, providing tools for data analytics that can support both REF and TEF, and helping to drive efficiencies in the sector through shared services such as a Universities’ datacentre. The future of this support is left unclear, and the structures proposed would mitigate against similarly integrated approaches in the future
• It is not clear where funding for research degree students would sit
• Funding flows are not reflected in the regulatory flow, with all responsibility for regulation seeming to pass to the OfS. This would seem to suggest complicated delegations would be needed between the OfS and the research funding body.
• Universities would presumably need Financial Memoranda or equivalents with each major funding body. Significant government intervention would be required to ensure requirements are not duplicated in slightly different ways or contradictory.
• The block grant is a key mechanism by which autonomous institutions can make most efficient use of public money, by allowing them to allocate resource
strategically and effectively. Direct allocation of hypothecated grants from BIS, or piecemeal allocation of QR funding through individual research councils would weaken these strengths.

We would also note that there is a great deal of expertise residing in HEFCE. It is essential that any proposals to re-arrange the architecture of the sector should ensure that this expertise is not lost.

18b To what extent should the Office for Students (OfS) have the power to contract out its functions to separate bodies?

Partially

18c If you fully or partially agree to question 18b, which functions should the OfS be able to contract out?

Please type your response in the text box:
OfS should have the power to contract out where it can demonstrate that to do so would meet one or both of the following goals:-

• Greater efficiency
• Access to specialist expertise which would otherwise not be available

It may also be desirable for the OfS to be able to contract out where a process would benefit from demonstrable independence. However, safeguards would need to be put in place to ensure that a multiplicity of subcontracts do not militate against efficiency, particularly since Government has made the unwelcome assertion that institutions will be required to pay for their own regulation.

Delegations would need to be decided on a case to case basis, using criteria including those set out above.

18d What are your views on the proposed options for allocating Teaching Grant? Option 1: BIS Ministers set strategic priorities and BIS officials determine formula. Option 2: BIS Ministers set strategic priorities and allocation responsibilities divested to OfS

Matrix 1 - Option 1:
Disagree

Matrix 1 - Option 2:
Not sure

Please give reasons for your answer to question 18d

Please type your response in the text box:
Option 2 is closest to the current model, which has been effective in ensuring government policy is reflected in funding while the risks to institutions of sudden change in policy direction are mitigated. However, the proposal to protect academic freedom and institutional autonomy via an independent ‘advisory’ committee is insufficient, particularly since no details are provided on how this committee would be appointed and governed. Option 1 splits regulation between BIS (which would presumably have responsibility for ensuring that the grant allocated had been deployed within the conditions of the receipt) and the OfS, which would deal with other regulatory matters relating to students, and potentially also the research funding body.

19 Do you agree with the proposal for a single, transparent and light touch regulatory framework for every higher education provider? 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.

Not sure

Please type your response in the text box:
We have some concerns about the Government’s proposals to make entry to the sector less onerous, and in particular liberalisation of the use of University title, for the reasons set out above. However, we agree that the same regulatory framework should apply to all providers once they are in the system.

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

Please type your response in the text box:
We have a very close and constructive relationship with the Oxford University Student Union. We do not have concerns about transparency or accountability of the union to its members. The union is already required by law (under the Education Act 1994) to have its expenditure monitored, and to publish its financial reports to both the University and all students. Its accounts are considered by its Council, which all students can attend. We believe that current safeguards are adequate and that further measures would be unnecessary.

21a Do you agree with the proposed duties and powers of the Office for Students? Please give reasons for your answer.

No

Please type your response in the text box:
The duties and powers of the OfS as they relate to students seem broadly reasonable although we would note that there seems to be an inconsistency between the OfS’ lack of power to distribute funds, and power to impose fines. ‘Sensible data protection precautions’ need to be defined. The difficulty arises with an organisation which is designated as an Office for Students’ having regulatory responsibility over the broader range of University activities. For research-intensive institutions, it is simply inappropriate for an Office for Students’ to maintain overall responsibility for financial, management and governance health checks. In 2014/15, only a fifth of Oxford’s turnover was derived from tuition fees and grants. At 31st July 2015, nearly three quarters of staff employed in academic activities
were on research only contracts. The new body would seem to have neither the obvious remit nor, potentially, the expertise to undertake this role.

21b Do you agree with the proposed subscription funding model? Please give reasons for your answer.

No

Please type your response in the text box:
The disadvantage to institutions of bearing the cost for activities which were formerly borne by government is clear. The advantage to BIS in passing this cost on is equally clear. The costs therefore need to be contained. Further clarity is required on how student numbers would be used to calculate the subscription – the overall size of the student body is not necessarily an accurate determinant of the amount of regulation required for that institution.

22a Do you agree with the proposed powers for OfS and the Secretary of State to manage risk? Please give reasons for your answer.

No

Please type your response in the text box:
The majority of these powers seem reasonable. The power for BIS to enter and inspect higher education providers is an inappropriate duplication of the OfS role, and potentially an infringement of institutional autonomy. It is a matter for concern that government is asking for this proposal to be condoned while giving no indication of what the purposes of such a power would be.

22b What safeguards for providers should be considered to limit the use of such powers?

Please type your response in the text box:
The only appropriate safeguard would be for this power not to be implemented.

23 Do you agree with the proposed deregulatory measures? 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

Yes

Please type your response in the text box:
We agree that the proposed landscape requires that all providers should be subject to the same regulatory requirements and that it is no longer appropriate to treat those bodies currently regulated by HEFCE as ‘public bodies’ in this respect, subject to the Freedom of Information Act.

However, in another respect we do believe that institutions should be treated as ‘public bodies’. We believe that all institutions which have access to funding through the Student Loans Company should be subject to the Public Sector Equality Duty, so that all providers in the sector are required to consider the equitable recruitment, retention and progression of all students by protected characteristic – as well as the complex interactions between them and the intersectionality between all protected characteristics and socio-economic background.

Reducing complexity and bureaucracy in research funding (Part D)

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?

Please type your response in the text box:
The Chancellor of the Exchequer remarked in his 8 July 2015 Budget speech that ‘We've got to secure the success of our university sector, which is one of the jewels in the crown of the British economy.’ The UK has indeed much to celebrate in terms of:

- The effectiveness and efficiency of its research base
- The intellectual and other impacts of its research,
- The calibre of its postgraduate research students and alumni
- The strength of its international research collaborations
- The world standing of its universities.

This could be put at risk, however, if the policy, funding and regulatory system fails to take a holistic view of university activity. The inferred landscape appears to be one in which the several interlinked aspects of research activity are funded and overseen separately.

The authors of the Green Paper fail to acknowledge the links not only between research and education but also between research and postgraduate research training, knowledge exchange (KE), impact, innovation and entrepreneurship. There is a significant risk to the benefits accruing to the UK from research if these links are not fully considered and explicitly acknowledged in any revision to the structural funding mechanisms.

For instance, the ‘new landscape’ in the Green Paper is said to have ‘students at its heart’ but the interests of postgraduate students in general, and even more so those of postgraduate research students, are largely ignored.

Those designing the future ‘institutional research landscape’ should take heed of the remark in the House of Commons S&T Committee report on the Science Budget that ‘If we get our spending priorities, our policies, regulatory frameworks or our immigration policy wrong, we will be on the wrong side of history.

At Oxford, as in the UK’s other world-class universities, research, education and KE are intimately related; our academics, researchers and students are involved in all three overlapping activities. Research benefits our teaching and our students (and vice-versa) and underpins KE and our contribution to UK innovation. Staff and students (postgraduates especially) in many disciplines and inter-disciplinary areas are active in growing new commercial businesses and in social enterprise.
Sir Paul’s report goes a little wider than the research councils but it is not a comprehensive picture of how to ensure a ‘successful UK research endeavour’. Postgraduate research, for example, is mentioned in one sentence: knowledge exchange is not mentioned, nor is HEIF, nor is entrepreneurship, nor is social innovation programs in universities. It is vital these elements are not forgotten in the future design of the institutional research landscape.

HEFCE has fostered the health of institutions and enabling capacity (in research, innovation and business and community interaction), Research Councils have fostered the quality of discipline-based and cross-disciplinary research project initiatives. The new arrangements, only partly sketched out in the Green Paper, must continue to do both, and to do so in a joined up way.

Dual support is, as the Green Paper observes, ‘a significant contributor to excellence of the UK research base.’ Dual support provides:  
- known, consistent underpinning investment over a period of time, facilitating strategic planning of research  
- critical mass built on proven excellence retrospectively, based on peer review of strategy and outputs and proven impact from the research  
- leveraged support for charity and business research  
- research degree supervision funding to help develop highly skilled workers and the next generation of researchers (all from HEFCE QR funding)

plus  
- competitive assessment of new ideas, both curiosity driven and user driven (Research Council funding)  
- ideas, often progressed in conjunction with professional support staff, that deliver societal and economic impact (Research Council, HEFCE HEIF, HEFCE via UnLtd and Innovate UK funding).  

The importance of the dual support system for research applies equally to knowledge exchange – the approach of (a) the research councils (and Innovate UK) and (b) HEFCE are complementary, not duplicative: there is competitive support through project grants as well as vital support through block grants to institutions for enabling infrastructure. A recent research report to HEFCE on the economic impact of HEFCE’s HEIF scheme indicates that it generates a return of £9.70 in benefits for the economy and society for every £1; the return by the most research intensive universities £25 for every £1 of HEIF (PACEC: Assessing the economic impacts of the Higher Education Innovation Fund: a mixed method quantitative assessment).

The current system, including not only the allocation of funding but also the assessment of excellence by means of RAE/REF, has produced a globally leading and highly efficient system.

If an overarching body were to be created to bring together Research Councils and the management of institutional research funding, that body must:  
- Combine significant governance-level and operational expertise relevant to the different funding streams and their objectives, incl. QR (all elements), Research Councils, the Capital Investment Fund (CIF), and the Higher Education Fund (HEIF)  
- Consult effectively, especially in the development of strategy  
- Develop evidence-based policies and programmes  
- Protect institutional autonomy  
- Be open and transparent

Sir Paul’s report (cf. p.31) at one point seems to assume that HEFCE remains but the Green Paper seems to presage its end; the Green Paper does not give due recognition to the very significant contribution that HEFCE makes to the higher education system (through its holistic policy development, evaluation, regulatory functions and funding streams across teaching, research, KE/innovation and infrastructure), and fails fully to describe what will be needed to take its place.

The Green Paper’s assertion that the new system will be less bureaucratic and less burdensome on universities is unconvincing. The headline ‘reducing complexity and bureaucracy in research funding’ remains just a headline – no specific actions to that end are described. Many decisions by successive governments, including restructures, have typically added to rather than reduced costs for the regulators and the regulated. Research UK will for example have to work across the interface with the HEFCs in the devolved administrations and, we presume, with the OfS in England relation to research students – this is hardly simplification and as far as one can foresee may well increase costs in the sector.

It is surprising that the Green Paper, the Nurse Review and the Autumn Budget make no reference at all to the importance of government funding to support the conduct of research (only partly) funded by UK medical and other charities. Charity QR has fallen to unsustainable levels. Unless reversed, UK universities will be unable to afford to do this research. A recent article in Times Higher Education (24 September 2015) highlighted the consequent risk that some of the major UK research funders, including the Wellcome Trust, may choose to invest not in the UK but overseas.

We very much welcome the recommendations by Sir Paul in relation to the Research Councils retaining their individual identities and close links with their communities; his arguments against their merger into a single Council are highly persuasive and must be carried through in the detailed design. But the proposal for a single Accounting Officer would seem to represent a fundamental change; are we, despite Sir Paul’s cautions, about to see a merger by stealth?

Sir Paul’s proposal to pilot joint university-Public Sector Research Establishment (PSRE) projects is interesting. There is clear value in improving the quality of research by making access to funds competitive across all entities capable of delivering research. Nonetheless, Sir Paul rightly acknowledges concerns that access for the 65 PSREs to some Research Council support would erode the funding available to universities (that has already been hard hit by the 2010 flat cash settlement and the Wakeham efficiency savings). Competition in funding can be an effective stimulus to research excellence, and if PSREs were eligible (in joint bids with universities) to access some Research Council funding, then we would wish to see an equivalent portion of PSRE block funding opened up to joint PSRE-university projects. If this is not done, then the value of competitive access to funding is seriously undermined.

We would vigorously oppose any allocation of research council funding to PSRE’s or the emerging hybrid institutes outside of open, competitive processes that draw on funding from both RUK and PSREs.

It is not clear in the Green Paper nor in Sir Paul’s report how the future of the National Labs (NL) is envisaged. NLs have a vital and distinctive role in the UK’s ability to build/use large science infrastructure. NL facilities need to be administered in a way that binds them to supporting the best scientific research and ensures that existing facilities are maintained and upgraded as required by leading edge science. If substantial change is envisaged, it should be in the direction...
While metrics can be helpful in informing assessments, they do not replace expert judgement. It is not currently feasible to assess the quality of UOAs or impact using quantitative indicators alone. Similarly, for the impact component of the REF, it is not currently feasible to use quantitative indicators in place of narrative impact case studies, or the impact template.

We are very sceptical of claims (made by some commercial publishing firms) that the REF could be run largely or entirely on metrics, or even more narrowly on bibliometric data. We strongly endorse the conclusion of the Independent Review of the Role of Metrics in Research Assessment and Management (The Metric Tide 5, July 2015) that: "...dual support system should be preserved, with approximately similar budget proportions with the Research Councils as now." (cf. p.31). This is critical to ensure that university research is able to be strategic, as well as agile and responsive.

The Green Paper sets out some of the key benefits of the REF and commits to retaining the strengths of the REF system.

At an annualised programme cost of 2.4% of total funds allocated, the REF is one of and perhaps the most efficient research funding mechanisms in the world. But it is, as the Green Paper notes (cf. p.72), much more than a way of allocating funding. We would argue that:

- Periodic national research assessment in the UK since 1986 has helped to increase the quality of research and related elements (incl. PGR training, intellectual property exploitation and public engagement)
- The significant level of funding at stake and the credibility of review (by leading UK and overseas panellists) means institutions do focus throughout the assessment period on the core success criteria, including environment, strategy, the quality of outputs and impact
- The REF incentivises positive action, including in relation to recruitment and retention of excellent researchers, collaboration, quality graduate researcher experience, researcher development, and optimising the academic, economic, cultural and social benefits of research
- Transparent reporting of the submissions and the results helps institutions to reflect and benchmark in ways not possible otherwise, because a common data set is available across the sector. This enables Universities to act strategically, set goals and improve against accepted national (and to some extent international) benchmarks
- The direct and opportunity costs of the REF are proportionate to the benefits

Concerns expressed about the total cost of REF 2014 largely focussed on the issue that much of the added time was due to one-off costs in grappling with the new Impact components (template and case studies). The net result was positive – there is clear evidence that this element of the REF has been successful in getting the research community to give more consideration to impact and powerful examples of impact have been shared with the general public and other stakeholders. Further, the additional costs of REF 2014 should not simply be measured against the value of QR allocated in 2015–22 but against the long-term added value of increased engagement between UK academia and users of research. In summary, relative to the cost: benefit ratio which pertains in preparing project applications to external funders, the cost: benefit ratio in the REF feels about right.

There are ways to reduce the costs of the REF (see our response to Q.28) but any changes must not reduce rigour or integrity. It is vital that the next REF be sharply guided by and in many senses owned by the sector, maintaining the trust and respect of the vast majority of academics and researchers. The exercise must be planned consultatively and managed with the same rigour as previous assessment rounds. One immediate concern is that the REF-related expertise at HEFCE may quickly be lost if staff at HEFCE face an uncertain future. A future REF could not be designed and managed effectively without that accumulated expertise, researcher development, and optimising the academic, economic, cultural and social benefits of research

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We are very sceptical of claims (made by some commercial publishing firms) that the REF could be run largely or entirely on metrics, or even more narrowly bibliometric data. We strongly endorse the conclusion of the Independent Review of the Role of Metrics in Research Assessment and Management (The Metric Tide 5, July 2015) that:

- At present further use of quantitative indicators in research assessment and management cannot be relied on to reduce costs or administrative burden
- It is not currently feasible to assess the quality of UOAs or impact using quantitative indicators alone. Similarly, for the impact component of the REF, it is not currently feasible to use quantitative indicators in place of narrative impact case studies, or the impact template.

We regard peer review as critical in other contexts of research assessment, both in future looking areas (such as publications and grant proposals) but also in retrospective actions (such as institutional reviews, promotion, hiring and planning), and we believe its value in making decisions on research is well established. While metrics can be helpful in informing assessments, they do not replace expert judgement.

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

- Continuity, as far as possible. Rule changes often sharply increase implementation costs in HEIs (e.g. the cost of producing impact case studies should be less for the next REF given the experience gained in REF 2014)
- The timely release of clear guidelines
- A consultative review of the data elements in the Environment section to make collection and reporting as efficient as possible; in particular the next REF should draw wherever appropriate on existing datasets (e.g. from HESA or Research Councils) that are already used to describe the research environment, such as the number of PGR students, PGR completions and external research income.
- Using bibliometric data more to inform panels if and only if these give robust indicators at UoA level (noting current and very serious limitations within SSH in particular) and would not create perverse incentives
- Reducing the scope for and the related costs of game-playing
- Not using the REF as a regulatory tool. Government should not use the REF exercise to try to influence other aspects of institutional behaviour or include compliance/assurance measures that are dealt with elsewhere, but maintain its international reputation as an assessment and benchmarking tool (and one that continues to be emulated by other countries).

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

There would seem to be a plethora of data but no ‘master plan’ as to how it all coheres. The government should bring together the regulators, major funders, universities and other stakeholders to review the current situation to agree (a) what information about research activities, outputs and outcomes is needed for effective management and accountability; (b) key indicators; and (c) the use, as far as possible, of shared systems or at least ensure inter-operability and easy data exchange.

Sir Paul recommends that the UK ‘enhance and expand present data management systems so they are readily accessible and searchable and describe all Government funded research, and as far as possible philanthropic and openly available commercial research activities.’ (cf. p.27)

Much better use should be made of existing data collected by government and funders, including for the REF, annual reporting to HEFCE, and progress and final reports to research funders.

From researchers’ perspective, the current situation feels piecemeal and bureaucratic. They are often asked the same or very similar questions on multiple occasions by different bodies, their time is or feels under-valued, and there is often no feedback as to what happens to the information they provide. In this regard the move to a single system for grant outcomes reporting to research councils is an example of how joint working can improve efficiency and effectiveness.

The use of unique identifiers (e.g. DOI/ORCID/Institutional ID) should be increased to achieve administrative efficiencies based on accurate attribution of data, enabling its proper re-use.

The government will need to step-up work with publishers to provide central shared resources to increase efficiencies (e.g. Router/Monitor).

Comments on the consultation

Do you have any 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.

Please type your response in the text box: