



Department for Business, Innovation & Skills

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

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

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

There is much in the Green Paper¹ to endorse. We welcome the proposal to recognise teaching excellence. We share the desire to encourage social mobility and to widen participation in higher education. We support the continued emphasis on a higher education system that embeds principles of diversity, choice and quality. We agree that the regulatory landscape should be evolved to create a simpler, more effective structure. However, there are three aspects of fundamental concern: the mechanisms proposed to secure these objectives, which in many cases are likely to be counter-productive; the proposal to separate wholly the regulation and funding of teaching from research; and, linked to that, the removal of one regulatory body independent of government with oversight of the entirety of university activity. Unless these issues are satisfactorily addressed, the proposals will cause considerable damage to the sector and, consequently, to its international reputation; they will also risk undermining the very priorities they are designed to advance.

The Green Paper fails to demonstrate an understanding of the purpose of our universities and the reasons for the sector's international standing. Universities exist to pursue knowledge for the benefit of society, through education (teaching and learning), scholarship and research. The community within which the advancement of knowledge occurs is crucial: the institutional culture of the best universities encourages the personal, as well as the intellectual, development of their students (undergraduate and graduate) in every discipline, enabling them to make positive social and economic contributions to society. The 'long-reach' aim of universities is to help students grow into thoughtful and critical citizens, not just earners and consumers.

The strength of the UK's higher education sector derives in large part from three key and inter-related characteristics: diversity, sustainability and, most importantly, institutional autonomy. As the Green Paper states,² diversity in higher education provision is crucial to the sector's ability to maintain its international reputation and to ensure the highest quality university experience for its students. Diversity provides choice to students in terms of subjects offered, learning styles and living environments (residential or non-residential); it provides society with graduates who have a wide range of skills; and, as recognised by Sir Paul Nurse in his recent review (the *Nurse Review*),³ it enables the full range of research to flourish.⁴ Sustainability is also critical. As acknowledged in the Nurse Review, the highest quality research is difficult: it requires patience, persistence and long-term investment.⁵ For students, degrees only have the vital and lasting value emphasised by the Green Paper⁶ if the awarding institutions continue to be respected nationally and internationally. Institutional autonomy – grounded in a proper recognition of the professional skills of practitioners, properly monitored by independent judges – helps to protect both diversity and sustainability at the same time as safeguarding the most fundamental tenet of higher education: the academic freedom of our scholars.

If our students – graduates as well as undergraduates⁷ – and the UK economy are to obtain even greater benefit from the sector, any implementation of the proposals in the Green Paper must reflect these qualities. We consider that, with some adaptation, this can be achieved to a significant extent. We offer the following observations to assist.

- The proposals in the Green Paper and the Nurse Review encourage the separation of teaching and research. This would irreparably damage the student and academic experience and the sector's reputation. Although a "rebalancing of the pull between teaching and research"⁸ is welcomed, it must not be to the extent that it leads to a two-tier system comprising separate teaching institutions and research institutions.

¹ "Fulfilling our Potential: Teaching Excellence, Social Mobility and Student Choice", November 2015.

² Paragraph 28, Introduction and Executive Summary; the Green Paper.

³ "Ensuring a successful UK research endeavour; a review of the UK Research Councils", November 2015.

⁴ Recommendation 1(vi); the Nurse Review.

⁵ Recommendation 1(vii); the Nurse Review.

⁶ Paragraph 9, Introduction and Executive Summary; the Green Paper.

⁷ It is notable and regrettable that the Green Paper fails to acknowledge the importance of graduate students.

⁸ Paragraph 20, Introduction and Executive Summary; the Green Paper.

Integration of teaching and research in the university environment – and therefore in the supporting structures – must be maintained if students are to benefit from exposure to the constantly expanding boundaries of knowledge. As recognised in the Nurse Review (notwithstanding his proposals for separation),⁹ high quality research and high quality teaching are interdependent; an exceptional learning experience for our students depends on them being taught, substantially, by exceptional researchers, who themselves benefit from teaching the next generation of scholars and researchers. Equally, how is the vital role of University sector research, recognised by Nurse as essential to the wellbeing of the national research effort,¹⁰ to be adequately represented and given sufficient prominence in the structure Nurse proposes?

- We agree that the higher education architecture needs to evolve. However, the proposal for the Office for Students (*OfS*) as currently advocated is not acceptable. As indicated above, a university is not simply a system for the delivery of instruction to undergraduate students, even if this lies close to the heart of its rationale. It is also a nursery of future excellence in research, a provider of graduate courses across a wide range of subjects, and a collaborative learning community for its teachers and researchers. The regulatory architecture needs to reflect these many different facets. Furthermore, we agree that students' interests need to be protected, but the interests of universities must be protected too – which in itself is in the interests of students.¹¹ The absence of one overarching independent regulatory body for universities at arm's length from government with responsibility for overseeing the full range of a university's activity is a basic flaw in the Green Paper's proposed new architecture. However, it is a defect that could be readily remedied. The *OfS* could be remodelled into an Office for Higher Education, with a remit covering teaching and research in universities. Such an organisation would differ from HEFCE in that it would also encompass the student-focused role the Green Paper envisages for the *OfS* i.e. it would have responsibility for the functions currently provided by OFFA, for TEF and for quality assurance, as well as teaching funding. However, it would also need to take over HEFCE's current responsibilities for the Research Excellence Framework and QR. Such an Office would then be perfectly placed to monitor institutional sustainability, which, as previously mentioned, is in the interests of students and the institutions themselves. There would be other advantages to a broader remit: the Office could more reasonably be the auditor and, for those higher education institutions that are currently subject to HEFCE regulation, the charity regulator; crucially, it could promote and protect research students' interests as well as those of undergraduate and taught graduate students. It could also be responsible for regulating compliance with Prevent and it could administer funding for university museums and associated institutions. None of these roles is mentioned in the Green Paper – these are crucial gaps in the proposals. (An alternative model would be to enhance HEFCE's existing responsibilities for universities to include the TEF/quality assurance and OFFA.)
- Any model of a teaching excellence framework (*TEF*) must provide a true measure of teaching excellence. Better still from the students' perspective, it should also be a measure of learning excellence or, even better, of the whole educational experience, including the pastoral care offered to students by their universities. Either way, a system that relies on crude or reductive metrics would be misleading to students and could create adverse incentives for institutions. A more accurate approach, which would be equally effective in providing the transparency endorsed by the Green

⁹ Page 24, the Nurse Review.

¹⁰ Page 24, the Nurse Review.

¹¹ Students benefit, for example, from a structure in which the integration of teaching and research across the disciplines is preserved and which seeks to ensure institutions' sustainability.

Paper, would be to establish a TEF as a kitemark of teaching (or learning/educational) excellence. Such an approach would have the added advantages of being fair and transparent and, because it would be relatively simple to operate, resource would not be unnecessarily diverted away from teaching and other educational activities into administration. (We also note that a TEF must be focused on teaching (or learning/educational) excellence alone. It must not be conflated with wider policy issues, such as widening participation.)

- Any model of a TEF must also respect difference – one of the great strengths of the UK sector. For example, a TEF must recognise different forms of teaching, such as the small group teaching provided by Cambridge’s supervision system. To create a structure that encourages homogeneity across institutions would be highly damaging to the sector and to its global reputation, and would reduce student choice.
- If a TEF is associated with an ability to increase tuition fees beyond inflation, students would be forced to choose between quality, as measured by a TEF, and affordability. Nor should there be any relationship between a TEF and the allocation of the teaching grant. We are strongly opposed to a link of either type.
- Although we are not in principle against the entry of new providers into the sector, rigorous standards must be maintained. Relaxation of the criteria for entry and reliance on market forces alone to determine which institutions succeed will encourage low quality and transient providers, as a consequence of which students will suffer (their degrees will no longer be “a currency that carries prestige”¹²) and the current outstandingly high international reputation of the UK sector will be damaged. The interests of students are not served by the multiplication of institutions that are unstable and struggling, lacking the capacity for secure long-term planning.
- We strongly agree with the statement that anyone with the appropriate talent and potential should be able to benefit from higher education.¹³ We have a sophisticated system for managing admissions in ways that widen access and we are continually assessing how we can improve the outcomes. However, the approach needs to be much smarter and more serious than the proposed imposition of admissions targets. Each institution must be free to evaluate what would work best for its own particular circumstances and to design and implement its own, bespoke, framework. We consider that the Director of the Office for Fair Access already has sufficient powers to address those institutions that are not adopting adequate and appropriate robust mechanisms. There is no justification for extending those powers as proposed by the Green Paper. There is, nevertheless, a case for the regulator and relevant agencies to work with the sector to gain a greater and continuing understanding of the true reasons why certain groups are under-represented in universities.
- We support the need to find more effective ways to fund interdisciplinary research and to tackle ‘grand challenges’. However, any new structures must preserve the system of funding research through dual support, and in similar proportions as are currently in place. As recognised in the Nurse Review,¹⁴ the unhypothecated funding provided by QR is critical to the success of our universities. It enables institutions to support their early career researchers and consequently to develop capacity and skills for the future, it supports “blue skies” research that can lead to innovation and impact, it provides a degree of stability for institutions and encourages long-term investment and it supports the existence of a diverse research portfolio across the country, one that is better able to respond to current and future challenges. The abolition of HEFCE and its substitution by a proposed Office for Students, which has

¹² Paragraph 17, Introduction and Executive Summary; the Green Paper.

¹³ Paragraph 24, Introduction and Executive Summary; the Green Paper.

¹⁴ Page 15, the Nurse Review.

no proposed role in research, does not provide adequate or appropriate safeguards for the dual support system, especially if it is moved entirely to Research UK as proposed in the Nurse Review.¹⁵

- The potential for ministerial intervention proposed by the Nurse Review is of concern. If the sector is to retain its global standing, research must be funded on the basis of proven excellence, and in such a way that has the confidence of the international academic community. As Nurse points out, research thrives on freedom of thought.¹⁶ While it is a political and democratic responsibility to mould the shape of higher education as a whole, the freedom of thought that underpins research must not in any way be endangered.

With further careful thought and with more detailed input from those with relevant expertise in the sector, many of the proposals in the Green Paper provide an opportunity to ensure that higher education remains one of the country's greatest strengths. In particular, we support the establishment of a TEF as a simple and respected kitemark of teaching excellence, and, even better, of educational excellence. Similarly, with reassurance that QR will be preserved in its current form, many of the recommendations in the Nurse Review will be capable of successful implementation. However, in trying to improve what the higher education system provides for the country, we must take care to maintain its core elements: the integrity and unity of teaching and research, diversity, sustainability and institutional autonomy.

This response is submitted on behalf of the University of Cambridge and its 31 Colleges.

¹⁵ Page 31, the Nurse Review.

¹⁶ Pages 3 and 6, the Nurse Review.

Public sector equality duty

Question 1:

- a) What are your views on the potential equality impacts of the proposals and other plans in this consultation?
- i) Annex A (section 6) notes that information barriers are disproportionately faced by those from lower socio-economic groups, women and ethnic minorities. The supporting paper providing evidence for this was produced in 2011, and, rather than presenting data illustrating the issue, it instead refers to yet older research. Two points arise.
 - a. First, UCAS has reported that women are now some 35% more likely to go into higher education than men, which is not suggestive of that group facing a particular obstacle. It is known that there is a considerable variance in terms of subject choice between sexes, which may affect outcomes, but it is likely that socio-cultural conditioning plays a more significant role in that than the quality of information that they receive.
 - b. Secondly, there is an assumption in the Green Paper that more information will result in prospective applicants (particularly those who are currently under-represented in higher education) making better choices. There is little evidence to suggest that previous innovations - such as Unistats or Key Information Sets relating to higher education course information - has had any positive effect on student choice overall or for individual groups. What is needed is better, rather than more, information, and – crucially – improved channels for its delivery to under-represented groups to make it more accessible. This speaks more to the improvement of careers advice in schools rather than the creation of new forms of information.
 - ii) Any metrics used in the TEF must reflect the context within which each institution operates. Such context includes the mix of courses offered by that institution, grades and subjects required for entry, and geodemographic considerations. Data available from UCAS, the DfE and HESA variously show, for example, that ethnic minority groups are considerably more likely to study closer to home when compared with the whole cohort of applicants, are skewed towards a narrower range of (often the most competitive) subjects at degree level and that some ethnic groups do not attain at a level that allows them to apply competitively to highly selective institutions. As has been reported in recent years, the same is true of white students from lower socio-economic backgrounds.
 - iii) We would further note that under-representation is the product of a combination of factors which cannot be neatly categorised. The sector variously recognises and uses socio-economic and demographic measures (POLAR, NS-SEC, ACORN, MOSAIC, OAC, IMD), educational metrics (student and school academic profiles), income based measures (FSM) and personal characteristics (care leavers, estranged students, females in STEM, mature students). Given the complexity of the issue, it is important that the regulating body is careful to reflect this in the language it uses and the measures it implements and it is critical that it seeks input from higher education institutions to ensure that the right outcomes are being pursued. This role is already being fulfilled through institutions' relationships with the Office for Fair Access, and so there is a question about the degree to which the TEF needs to be concerned with this. However, the assistance of the government in securing data that will help the sector to better understand the challenges it faces would be very welcome.

- iv) We will reserve the detail of our comments about the proposal to introduce name-blind admissions for the UCAS consultation which has just been launched. However, we would note that:
 - a. there is very little evidence that ethnic bias in admissions exists;
 - b. comparisons with employment recruitment are flawed because the higher education admissions process makes far greater use of the quantitative academic profile (i.e. specific grades and subjects, which it is possible to set within a wider context) as opposed to a highly qualitative assessment of track record and personal attributes;
 - c. the proposal to suppress information from the admissions process runs contrary to the contextual approach to admissions advocated by social mobility commentators;
 - d. the load it would create greatly increases the scope for error, and for some of the courses that attract high volumes of interest from ethnic minority students (such as Medicine) would be impossible to implement because identification must be established for the purposes of admissions tests and interviews.
- v) It would be unfortunate if students were deterred from applying to institutions rewarded for teaching excellence because they become more expensive to attend; this would undoubtedly impact on access to university and may have longer term repercussions. Should institutions be permitted to charge a higher level of tuition fee in the future, it is important that the loans made available continue to cover the full cost of those fees (and on the same terms) so that students do not have to contribute up-front and under-represented groups are not affected disproportionately.
- vi) We welcome the government's proposals to explore Sharia-compliant finance, which has been a long-standing barrier to participation.

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

- Yes
 No
 Not sure

Please provide any further relevant evidence.

- i) The Equality Impact Assessment set out in Annex A seems to assume that teaching quality will be defined in the same way by all students. It is far from clear that this is the case. In particular, disabled students will, for example, wish to assess teaching quality in terms of its accessibility and inclusive practices. Other groups may well have other aspects that they consider to be of significance to them, including provision for study skills (for those who have been out of education for any time including, perhaps, mature students). We stress in our response the importance of not only measuring 'teaching quality' but the wider educational experience and support provided: the Green Paper maintains that diversity of provision is important, and that must extend beyond diversity of courses and subjects to diversity of experience. This could be captured in the qualitative statement, but it is unclear how this would be scored alongside the quantitative metrics, or how this information would be presented to students. The equality impact of the metrics chosen and how they are presented and explained will need to be assessed.
- ii) Emphasis on employability as a metric suggests a view that employability and career choices are determined only by higher education experiences and teaching quality. Although important, there are many other factors at play, including personal values and ambitions, and the definition of employability will need to be carefully considered and metrics carefully chosen to reflect that. The effects of 'social capital'

may, in some cases, extend beyond university into employment – although this effect may be countered by benchmarking of metrics, this will make measures more obscure to the student reader trying to assess information. The prospects of mature students and those studying part-time, or constraints such as ability to relocate associated with a disability, may also affect employability.

- iii) Employability is not the only measure of social mobility; for example access to higher degrees and further professional courses might be taken into account.

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

Question 2: How can information from the TEF be used to better inform student and employer decision making? Please quantify these benefits as far as you can.

- i) We welcome the focus of the Teaching Excellence Framework (TEF) as a mechanism for identifying excellence in teaching and the consequent raising of the profile of teaching within higher education institutions and beyond. That said, we do not consider that the information from the TEF as proposed, by itself, is likely to be of benefit either to student decision making in choosing a university or to employer decision making in selecting employees.
- ii) Very little information is given in the Green Paper about the operation of TEF, other than that it will primarily be metric based and there are likely to be different levels of excellence identified.
- iii) Whether the TEF will inform any decision making will depend on what the TEF is actually measuring. It is unclear that a TEF grade at a particular level will give students or employers sufficient information to gauge teaching excellence at an institution. And, of course, students and employers are rightly concerned about much more than teaching excellence in making decisions. For students, the focus will be on the entire educational experience: the blunt TEF, as currently proposed, will not assist in this regard; and employers will be looking for skills and knowledge derived from the entire experience.
- iv) The only apparent benefits of TEF to higher education providers are to establish a reputation for teaching excellence and to enable them to raise tuition fees. However, the former will only be achieved if the metrics and other measures are appropriate. On the latter, we do not support the linkage between TEF and fees: it is bound to affect student decision-making adversely, and in particular it may deter students from low income families from applying to the best universities. We do not have confidence that the suggested metrics will be fit for the purpose of establishing teaching reputation, although we await the Technical Consultation for more detail.
- v) If detailed contextual information from the TEF is provided for students and employers, it only has the potential to be useful if:
 - a. it comprises a basket of institution-specific metrics;
 - b. it recognises the differing needs of students, employers and other (including international) stakeholders.
- vi) Any model of a TEF must respect differences between providers. The current diversity of the UK higher education sector provides a wide range of choice relating to the type of institution, the subjects on offer, learning styles and different learning environments. It would be highly damaging to the sector to create a TEF that diminishes this diversity. A TEF must therefore be designed to recognise different

teaching forms including, here at Cambridge, the supervision system of small group teaching. Without this flexibility, the TEF would be detrimental to students and to the global standing of UK higher education.

- vii) The TEF must be a true measure of teaching excellence. As a collegiate University, Cambridge has significant concerns about the focus of the TEF being on teaching alone, rather than on the entire student learning or educational experience. Without consideration of the broader learning environment, welfare support and opportunities for personal development, there is a risk that the TEF could create adverse incentives for higher education providers.

Question 3: Do you agree that the ambition for TEF should be that it is open to all HE providers, all disciplines, all modes of delivery and all levels?

- Yes No Not sure

Please give reasons for your answers.

- i) We agree with the ambition for the TEF to be open to all HE providers, disciplines, modes of delivery and levels. However, this should not be at the expense of recognising the diversity across the sector - creating a 'one size fits all' structure would be highly damaging to student choice and the global reputation of the sector.
- ii) The use of 'one-size' metrics in TEF to cover all disciplines would be inappropriate given the variety of disciplines and providers to be considered. That said, we are equally opposed to TEF being focused on individual subject disciplines. If this were to be implemented, students would be provided with a large amount of potentially confusing data that would not necessarily allow them to compare like with like, owing to the differences in disciplines between providers. Further assessment of TEF by subject discipline would be complex and excessively bureaucratic (particularly if it then gives rise to differential tuition fees between subjects) and it would risk ignoring the wider educational experience offered by the best universities. The TEF should be simple, straightforward and not unnecessarily divert resources from universities' core activity. We consider, therefore, that the TEF should be a mark of excellence in teaching and in the learning experience of an institution as a whole.
- iii) Consideration needs to be given to how the TEF could be expanded to include taught postgraduate provision - a significant aspect of higher education activity which is not considered in the Green Paper. Expansion into this area would necessarily require a different set of metrics, and therefore it further supports the proposal that the TEF provides a kitemark of excellence.

Question 4: Where relevant, should an approved Access Agreement be a pre-requisite for a TEF award? What other mechanism might be used for different types of providers?

- i) The TEF, as defined in the Green Paper, is an assessment of teaching excellence. Widening participation and compliance with Access Agreements help to ensure that the very best applicants are encouraged to apply and to be admitted to universities, and benefit from excellent teaching. They are not in themselves a measure of teaching excellence. The possible linkage between TEF and widening participation betrays a fundamental confusion about the function of TEF: it should be used as a measure of teaching excellence, not to achieve policy objectives around social mobility. Consideration of Access Agreements already takes place under the auspices of OFFA; this is where that work belongs.

- ii) For some higher education providers (including Cambridge University), the excellence of the student experience as a whole, enabled by excellent teaching and underpinned by strong pastoral support and extra-curricular activities which build transferable skills, ensures that student retention and attainment are both very high. In those universities, the Access Agreements focus on issues that are not relevant to teaching and would not be suitable for this purpose. Whilst Cambridge University continues to support the widening participation agenda, that agenda has no link to teaching excellence.
- iii) Furthermore, the proposal risks undermining institutional autonomy.

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.

- i) A successful QA review has hitherto provided assurance of the threshold standard of provision. In itself, it is not a sufficient indicator of teaching excellence: it considers internal QA process and does not measure the educational experience of students. Further thought needs to be given to the future QA process and its relationship to TEF, with TEF providing a kitemark of excellence and QA outcomes providing assurances as to internal QA processes.
- ii) It is difficult to see how the implementation of TEF into multiple levels can be anything other than a major regulatory burden on institutions with little obvious additional benefit to students and employers. The benefit to universities and other stakeholders of a differentiated TEF are not clear. The proposed TEF is too complicated in having different levels, with no clarity as to how each level should be distinguished. We are unconvinced that any of the metrics so far proposed are sufficiently robust or granular to allow such differentiation.
- iii) The potential for a highly differentiated TEF to cause reputational damage to the sector globally will be significant. There should be no obligation for an institution to seek an assessment beyond TEF level 1 and there should be no negative implications should an institution not wish to do so. We have concerns regarding how different TEF tiers might be interpreted by other organisations. For example, Professional, Statutory and Regulatory Bodies (PSRBs) might choose not to accredit courses below a certain TEF level.
- iv) We are strongly opposed to the association of TEF with an ability to increase tuition fees beyond inflation. This would force students to choose between quality (as measured by a TEF) and affordability. We are opposed to further steps towards the marketization of Higher Education implied by increased differentiation of fees

because it diminishes access to the system, and because of the negative impact it has on the partnership between students as learners and universities as educators. Therefore, we see no benefit to universities from having a TEF which is anything other than a kitemark of excellence; indeed, we consider there will be significant damage if a TEF attempts to be anything more.

- v) We welcome the assurance that the adoption of a grade point average (GPA) by an institution will not be a criterion for TEF eligibility. There is not yet widespread acceptance of GPA across the sector, nor agreement about whether it delivers the benefits it claims in respect of reining in national grade inflation. Adoption of such a system at Cambridge would require significant changes to the way in which we conduct our examination and degree classification of students, and would require further detailed consideration.

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

Timing?

- Yes No Not sure

Assessment panels?

- Yes No Not sure

and process?

- Yes No Not sure

Please give reasons for your answer.

- i) Beyond the implementation of TEF level 1 (meeting or exceeding the expectations for quality and standards in England based on a recent QA result rather than any other metric), the timetable for the further development of TEF looks unrealistic. The identification of appropriate metrics will require significant consultation with the sector, take time and require a number of iterations, as will the development of a template for institutional narratives.
- ii) Whilst we agree with the concept of 'Assessment Panels', these must include academic peers who command respect across the institution which they are assessing, as well as student representatives and experts in pedagogy. These academic peers would be able to provide an understanding of the importance of the inter-relationship between teaching and research in universities and the benefit this brings to the learning experience.

Question 7: How can we minimise any administrative burdens on institutions?

Please provide any evidence relating to the potential administrative costs and benefits to institutions of the proposals set out in this document.

- i) In order to minimise any administrative burden on institutions, any model of a TEF system should not be subject to constant amendment. Aside from the administrative burden that this would cause, regular changes would risk resulting in significant confusion to students, employers and other (not least international) stakeholders and would undermine the ability for information from the TEF to be used to inform decision making. Metrics which involve new and additional data requests should not

be introduced. The creation of complex, different levels of excellence based on the metrics as currently being discussed is likely to be excessively bureaucratic, and open to legal challenge.

- ii) It is difficult to estimate the likely cost, but this should be proportionate. Lessons must be learned from the REF in terms of cost, its distortion of behaviour across the sector and the resultant deviation away from its core function (the distribution of QR funding).
- iii) Whilst we acknowledge that it would be extremely difficult to assess all disciplines via the same metrics, a TEF implemented at the level of each discipline would be a substantial regulatory burden. It would also produce potentially confusing data for students because the nature of disciplines varies between institutions and students would not necessarily be comparing like with like.
- iv) Medical and Veterinary Schools are currently quality assured by their respective regulatory bodies as well as the QAA. Teaching follows a mixed academic and clinical model and necessarily involves practical placements and skills-based learning in addition to intensive academic education and intellectual challenge. Care needs to be taken in developing the TEF framework to avoid double assessment and an increased administrative burden.

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

- Yes No Not sure

Please give reasons for your answer.

- i) Please see our response to 5(c) above. Different TEF levels are very unlikely to provide worthwhile additional information to students and employers and would be administratively complex for the sector and the regulatory body. Not all subject disciplines can sensibly be measured through the same metrics.

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

- Yes No Not sure

Please give reasons for your answer.

- i) There must be sufficiently rigorous standards for entry on the part of new providers; without those standards there is a risk of damage to the sector's global reputation and to students' educational experiences.

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

- Yes No Not sure

Please give reasons for your answer.

- i) We agree that there should be a focus on teaching quality, learning environment, and student outcomes. We are unclear what is meant by learning gain, or how this could be measured in any meaningful way.

- ii) Broad and flexible metrics are needed to capture diversity in the sector, including the particular support we offer here in Cambridge in a partnership between the University and the Colleges.
- iii) The assessment of student outcomes needs to be related to the wider goals of the educational process, and not harnessed to crude external factors like earning capacity. A graduate who moves on to a career in primary school teaching or NGO administration may have had every bit as excellent an experience of teaching as one who begins a career in finance or industrial chemistry and, for the wellbeing of the country, such people are just as vital.
- iv) Excellence in the entire educational experience is the hallmark of a successful university and this should not be lost in the development of a TEF. Students benefit significantly by being taught by exceptional researchers and through exposure to the constantly expanding boundaries of knowledge. Excellent teachers and researchers at all levels work in partnership with their students to facilitate that education. The focus must, therefore, be on the entire learning experience and not solely on teaching excellence. Students attend university not only to be taught and to develop intellectually, but also to develop as a person within a richly varied educational community. This experience enables graduates to make positive contributions to society far beyond the completion of their degrees.

Question 11: Do you agree with the proposed approach to the evidence used to make TEF assessments - common metrics derived from the national databases supported by evidence from the provider?

Yes No Not sure

Please give reasons for your answer.

- i) We accept that there is a need for metrics, provided that they reflect the overall learning experience. It is important, therefore, that any model of a TEF should include a range of metrics which can be chosen by each institution as appropriate to its mission and which are meaningful, relevant and easy to understand. A system that relies on crude or reductive metrics must be avoided: it would mislead students and could create adverse incentives for institutions.
- ii) The devil is in the detail with regard to the identification of appropriate metrics and this awaits the technical consultation in early 2016. Many of the metrics which might be suggested cannot be regarded as reliable indicators of teaching or learning excellence. Some might be acceptable as part of a basket of metrics. For example:
 - a. **Graduate employability** – this does not obviously relate to the excellence of teaching. Whilst salary may be influenced by the type of job taken, there should be no assumption that salary is the sole indicator of a successful career or of teaching excellence. We are very concerned about the adverse effects of this metric – which would take no account of those students who for example, might choose to enter the voluntary sector, the caring professions, pursue further study or spend several years establishing their own business. If students wish to follow a career path with a lower starting salary, that is not a mark of poor teaching – it might be the consequence of inspired teaching encouraging the student to get wider life experience, to pursue their intellectual curiosity or to focus on making a contribution to society rather than pursuing a career with more immediate financial rewards.
 - b. **Teaching Qualifications** – these may not be the most reliable indicator of teaching excellence, particularly in those institutions where teaching is

grounded in research, where research qualifications may be more valid indicators of excellence.

- c. **NSS** – this is a statement of student satisfaction with teaching rather than a measure of teaching excellence. However, it will be of some relevance in reflecting the student voice on some aspects of teaching excellence.
 - d. **Contact Hours & Group Size** – these would be good indicators of the student educational experience and would provide students with information about the level of individualised teaching and study support available.
 - e. **Retention** – current metrics on retention and continuation do not provide any context as to why a student chooses to discontinue. Retention does not obviously relate to the excellence of teaching that a student receives, although it may be representative of the wider learning environment. This metric could have an adverse effect on widening participation in some higher education providers.
- iii) There is currently no credible metric for measuring learning gain in a consistent way across the sector. There is a risk that crude metrics (e.g. the relationship between entry tariff and degree classification) discriminate unfairly against institutions such as Cambridge that have high levels of attainment on entry.
 - iv) Metrics must be supplemented by institution-specific evidence from the provider regarding their educational environment, which should include pastoral provision.

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

Question 12:

- a) Do you agree with the proposals to further improve access and success for students from disadvantaged backgrounds and black and minority ethnic (BME) backgrounds?

Yes No Not sure

Please give reasons for your answer.

- i) We strongly support the widening participation (WP) agenda and have made significant efforts in WP over the last decade, with considerable success. We recognise there is still much more to do. Every higher education provider will wish to ensure that it is making sufficient progress on WP measures within the context of national levels of achievement in qualifications and subjects required for entry, and geodemographic considerations.
- ii) However, we strongly oppose any imposition of admissions targets.
- a. The imposition of targets is in direct conflict with the desire to protect institutional autonomy and academic freedom expressed in the Green Paper.
 - b. Participation targets risk endangering the fundamental principle of educational standards required for entry. They would risk harming the outcomes upon which the national and global reputation of the sector relies and the prestige and benefit of achieving a degree for students.
- iii) It will be important to ensure that any objectives are properly defined (for example, and as the Green Paper recognises, participation by ethnic group in higher education varies significantly and so BME is not in itself a useful category) and either grounded in sufficiently granular evidence or left to higher education providers to determine within their own context.
- iv) We see no benefit from anonymising applications – indeed, there is a high risk that this would adversely affect continued efforts to widen participation. The reduction of access to personal data runs counter to contextualising admissions and it would be contrary to the guidance provided by BIS and the Cabinet Office in 2011, advice from SPA and OFFA, and policy advocated in the recent Milburn Report on social mobility. Collegiate Cambridge has, in recent years, developed robust mechanisms for assessing the ability and potential of the individual in the context of their social and educational background; anonymising applications would make contextualisation much more difficult and risk efforts to improve access to higher education for disadvantaged and under-represented groups. Such a policy would indeed be to little advantage given that we go on to interview the majority of our applicants and like other universities we would need to be able to identify students at that point. Furthermore, there is currently little evidence to demonstrate that the existing name-seen process creates ethnic and social inequalities in university admissions.
- v) We welcome the Government’s proposal to develop an Alternative Finance model for students that is Sharia-compliant and look forward to this being introduced alongside the existing student loan system.
- b) Do you agree that the Office for Students should have the power to set targets where providers are failing to make progress?

Yes No Not sure

Please give reasons for your answer.

- i) As outlined above, we strongly oppose the imposition of admissions targets. It should be for individual institutions, within overall Government strategic guidance, and following close consultation with the regulator, to set their own targets having accounted for their own circumstances and having assessed the most appropriate way to improve widening participation. Institutions should then expect to be held to account by the regulator for their performance against the targets.
 - ii) The imposition of targets - effectively quotas - is in direct conflict with the desire to protect institutional autonomy and academic freedom expressed in the Green Paper and risks adversely affecting the widening participation agenda. The Director for Fair Access already has sufficient powers at his disposal and should only use these powers when he can provide substantive evidence that an institution is not setting itself sufficiently challenging targets and making progress against them.
 - iii) There is, nevertheless, a case for the regulator and relevant agencies to work with the sector to gain a greater and continuing understanding of the true reasons why certain groups are under-represented in universities.
- c) What other groups or measures should the Government consider?
- i) It should continue to be for the Office for Fair Access and individual institutions to agree groups and measures.

Question 13:

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

- i) The availability and linkage of data from DfE (i.e. the National Pupil Database), UCAS, SLC and HESA is essential for the better understanding of the barriers to higher education and for the setting of meaningful targets.
- ii) Given that under-representation is by definition the science of small numbers, suppression or rounding of such data is unhelpful. However, we are mindful of the burden that could be placed on such agencies, and we therefore recommend that access to their data is restricted so as to avoid inhibiting legitimate academic research and unnecessary and excessive administrative burdens.
- iii) One way to achieve this might be by creating datasets or services that respond to feedback from periodic consultations, either with the sector generally or with a specific cross-institution group created for the purpose of defining sector needs. Such an exercise might usefully be led by OFFA or the Office for Higher Education, which we propose at Question 21 below.

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

- i) It is to be expected that preparation and release of data will come with an associated cost. Organisations should develop a proportionate charging model upon which they consult with the sector and which is recognised by OFFA as returnable expenditure on access.

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

Question 14: Do you agree with the proposed single route into the higher education sector?

- Yes No Not sure

Please give reasons for your answer, including information quantifying how the potential cost of entry would change as a result of these proposals.

- i) The University supports the need for a common regulatory and statutory framework across the sector that maintains the highest standards of higher education in the UK. New entrants to the sector should have to demonstrate that they can comply with those standards. We agree that a single proposed route into the higher education sector would be beneficial, but only if the process for entry rigorously tests the ability of providers to comply with those standards in all aspects of their activity.

Question 15:

a) Do you agree with the proposed risk-based approach to eligibility for degree awarding powers (DAPs) and university title?

- Yes No Not sure

Please give reasons for your answer.

- i) Although we are not in principle against the entry of new providers into the sector, it must be on the basis of rigorous quality controls at entry, followed by the maintenance of the highest standards throughout in order to protect students' interests and the outstandingly high international reputation of the sector. Relaxation of the criteria for entry and reliance on market forces alone to determine which institutions succeed will encourage low quality and transient providers.
- ii) The proposed risk-based approach does not include any consideration of the research environment for awarding the university title and weakens the requirements for a provider to demonstrate its academic performance. The University of Cambridge considers research-led teaching to be essential for providing a high quality learning experience for students - the symbiosis between teaching and research should operate at all levels within universities and evidence of scholarship should be essential for the university title.
- b) What are your views on the options identified for validation of courses delivered by providers who do not hold DAPs?
- i) We acknowledge the concerns outlined in the Green Paper regarding the limitations of the current system of validation arrangements. However, any changes or additions to the current arrangements must seek to maintain the quality and standard of higher education provision in the UK and must not risk undermining its reputation internationally. There are ways to improve existing arrangements without significant changes to legislation or opening up a wider set of validation options. An Office for Higher Education (see response to question 21a) could work with existing providers to

develop options for validation that seek to increase transparency and make it easier for new providers to find validation partners within the sector.

- ii) The Green Paper fails to recognise that current validation arrangements allow a new provider to benefit reputationally from working in partnership with an existing provider. These partnerships also provide prospective students with confidence about choosing a new provider and ensure that their degrees will have a lasting value.
- iii) The proposal that non-teaching bodies could be given DAPs by the Government poses a significant risk to the quality of higher education on offer in the UK.
 - a. Given that part of a validating organisation's role is to assess the courses on offer in terms of meeting appropriate standards and quality, it is difficult to see how a non-teaching body could assess the quality of the teaching on offer from a pedagogical viewpoint.
 - b. There is also a risk of undue interference in the sector, as the selection of non-teaching bodies must solely reflect academic excellence.

Question 16: Do you agree with the proposed immediate actions intended to speed up entry?

- Yes
 No
 Not sure

Please give reasons for your answer.

- i) The University strongly opposes the proposal to increase the ease of entry to new providers.
- ii) The proposed shortening of the timeframe for new providers is unworkable – reducing this to two years is completely unacceptable as it would not allow sufficient time to evaluate a provider's ability to maintain the quality and standards required for the usual full degree cycle (minimum 3 years). This would not only be damaging to the student interest but it would also put unacceptable risk on the sustainability of the sector and its international reputation.
- iii) The requirement for new providers to meet a number of prerequisites before applying for specific course designation is essential to ensuring that the education on offer is of the highest quality and is sustainable. Only then can higher education deliver long-term value to students.
- iv) The suggestion that the shortening of the timeframe might be acceptable if accompanied by some form of guarantee of student protection is not sufficient to counteract the significant risk to the learning experience of students enrolled at such a provider should it fail financially.
- v) The Green Paper itself recognises that an increased rate of entry of new providers into the sector would result in an increased risk of provider exit. It is essential that new providers can demonstrate their financial sustainability over the medium term in order to safeguard students who enrol at those providers and to ensure that degrees awarded by such providers continue to be "a currency that carries prestige" and have lasting value.

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

Question 17: Do you agree with the proposal to introduce a requirement for all providers to have contingency arrangements to support students in the event that their course cannot be completed?

Yes No Not sure

Please give reasons for your answer, including evidence on the costs and benefits associated with having a contingency plan in place? Please quantify these costs where possible.

- i) The Government seeks to speed up the rate of entry of new providers into the sector in order to increase student choice, but notes that this may also bring an increased likelihood that a provider may need to exit either through necessity or choice. This seems to contradict the desire for higher education to deliver lasting value to students. It also does not inspire confidence about the expectations of success of new providers either in respect of the student experience they offer or their contribution to the sector's reputation.
- ii) A failing or poor higher education provider would be damaging to any students associated with that provider, both in terms of current students and alumni. It would also cause significant damage to the UK's higher education sector across the world.
- iii) Whilst Cambridge recognises that there would be a need to protect students and the reputation of the sector in the event of a provider exit, the cost of managing failed providers must not fall, even indirectly, on other higher education providers.

Simplifying the higher education architecture (Part C)

Question 18:

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

Yes No Not sure

Please give reasons for your answer.

- i) We agree that the higher education architecture needs to evolve. However, the proposals relating to the higher education architecture represent a fundamental change to the landscape of higher education that risks damaging the educational experience for students. In particular, the changes to the regulatory and governance arrangements – the separation of the funding and regulation of teaching from research and the removal of a buffer between universities and BIS with oversight of the entirety of university activity – will threaten the fundamental importance of institutional autonomy. Cambridge University considers this to be unacceptable.
- ii) Cambridge maintains the view that teaching should be research-led in order to provide a high quality learning environment for students. Any separation of teaching from research will irreparably damage the student and academic experience and the sector's reputation.
- iii) A “rebalancing of the pull between teaching and research” is welcomed, but it must not be to the extent that it leads to a two tier system comprising separate teaching

institutions and research institutions. This would dilute the rich learning environment that higher education should provide to its students. While we agree that it is a mistake for universities to advertise the presence of academic “stars” who play little or no active part in the education of students, it is no less a mistake to think that high quality teaching must always depend on intensive involvement at every level by senior academic staff. Small group teaching by PhD students, involved in cutting edge research, can be an exceptionally stimulating vehicle, testifying to the vital symbiosis between teaching and research, and strengthening the understanding of teacher and student alike.

- iv) The Green Paper states that “there is evidence to suggest ‘strong orientations towards research often reveal a weak emphasis on teaching and vice versa’”. This quotation is misleading. The same report also found that actively aiming to involve undergraduates in research provides significant benefit to students. At Cambridge, research and teaching are intimately interwoven at undergraduate level (including research projects and summer research initiatives, including those where students work within a research group), and this experience encourages undergraduates to apply for postgraduate degrees. The core research skills of evidence assessment, problem solving, creativity, team work and critical thinking are those that employers of our undergraduates value, and not necessarily subject-specific knowledge or technical ability.
- v) A university is not simply a system for the delivery of basic instruction to undergraduate students, even if this lies close to the heart of its rationale. It is also a nursery of future excellence in research, a provider of graduate courses across a wide range of subjects, and a collaborative learning community for its senior teachers and researchers. The regulatory framework for higher education must reflect these many facets.

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?

- i) The Office for Students should have the power to contract out some of its functions to separate bodies where this helps to reduce the administrative burden on higher education providers, allowing them to focus on their core activities of teaching and research. Where it represents a significant change from existing processes, this should be done in further consultation with higher education providers.
- ii) The collection and publication of data through HESA is well-established and it would be helpful, from an institutional perspective, to ensure continuity and consistency of processes from year-to-year (albeit with consideration given to the work of HEDIIP to reduce the burden on data providers). Consistency in data collection also serves to improve the provision of information to students and employers and allows for meaningful research on areas such as widening participation.

d) What are your views on the proposed options for allocating Teaching Grant?

Option 1: BIS Ministers set strategic priorities and BIS officials determine formula.

- Agree Disagree Not sure

Option 2: BIS Minister sets strategic priorities and allocation responsibilities divested to OfS

Agree Disagree Not sure

Please give reasons for your answer,

- i) Cambridge University is concerned about the removal of HEFCE as the body sitting between government and universities. The absence of a “buffer” puts universities increasingly at risk of outside interference and undermines institutional autonomy. The proposal that the teaching grant might be directly determined by Government is therefore unacceptable to the University.
- ii) The teaching grant should continue to be allocated by a regulatory body at arm’s length from the Government, with oversight from an independent board.

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

Yes No Not sure

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

- i) Cambridge recognises that the different regulatory framework for different higher education providers does not serve either the sector or its stakeholders well. We therefore support the need for a common risk-based regulatory framework across the sector that maintains the highest standards of higher education in the UK. All providers – including new entrants - must be able to comply with that a framework in order to ensure a high quality educational experience for students.
- ii) In respect of the statutory framework, we believe that the Government should ensure that all higher education providers are subject to the same obligations, either through consistent exclusions from, or by bringing all providers within, relevant legislation (albeit, in the case of the Freedom of Information Act (FOIA), while strengthening the exemptions within the Act to ensure an appropriate balance between transparency and regulatory burden).

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

- i) The University of Cambridge is very concerned about apparent attempts to undermine the work of Students’ Unions. Students’ Unions have vitally important representation and welfare functions which must be maintained. In properly exercising their functions in representing students collectively and supporting them individually it is essential that Students’ Unions remain independent of their universities.
- ii) We are satisfied that our two Students’ Unions (Cambridge University Students’ Union and University of Cambridge Graduate Union) are transparent and accountable to their student members, and support their efforts to engage with them. We also have great confidence in the representational role played in Cambridge by the undergraduate and postgraduate student bodies in each College. We believe that regulation through our

own internal mechanisms and under the Education Act 1994 ensures appropriate levels of transparency and accountability.

Question 21:

a) Do you agree with the proposed duties and powers of the Office for Students?

Yes No Not sure

Please give reasons for your answer.

- i) The proposal for the Office for Students (*OfS*) as currently advocated is not acceptable. We agree that all students' interests need to be protected, but the interests of universities must be protected too – which is in itself in the interests of students.
- ii) The absence of one overarching independent regulatory body for universities at arm's length from government with responsibility for overseeing the full range of university activity is a basic flaw in the architecture proposed in the Green Paper. This defect could be remedied through remodelling the OfS into an Office for Higher Education, with a remit covering teaching and research in universities. Such an organisation would also have responsibility for the functions provided by OFFA, TEF and quality assurance, as well as teaching funding, and could therefore address the need for a student-focused organisation that the Green Paper seeks to achieve through the OfS. However, it would also need to take over HEFCE's current responsibilities for the Research Excellence Framework and QR.
- iii) These adaptations would allow the Office to monitor institutional sustainability, which, as previously mentioned, is essential to protecting the vital and lasting value of degrees. A broader remit would also allow the Office to be auditor and, for those higher education institutions that are currently subject to HEFCE regulation, charity regulator and, crucially, it could promote and protect research students' interests in addition to those of undergraduate and taught graduate students. It could also administer funding for university museums and associated institutions, currently administered through HEFCE's University Museums, Galleries and Collections funding. None of these functions is covered by the proposals in the Green Paper.
- iv) There is an alternative model, which is simply to enhance HEFCE's existing responsibilities for universities to include the TEF/quality assurance and functions provided by OFFA.
- v) Unless these issues are satisfactorily addressed, the proposals will cause considerable damage to the sector and, consequently, to its international reputation.

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

Yes No Not sure

Please give reasons for your answer.

- i) The Green Paper proposes that a subscription funding model would be based on student numbers, whilst also proposing to minimise monitoring through the regulatory framework for low risk providers. The proposed funding model could add considerably to the financial burden on institutions - if a subscription funding model were to be

introduced for the sector, the costs associated with the OfS (or Office for Higher Education) must be contained.

- ii) Any subscription should be proportionate to the amount of regulation required for that institution and the risk that an institution represents. It should not be based solely on student numbers.
- iii) Whilst we recognise the Government's aim to prevent any subscription model forming a barrier to entry, any subscriptions from existing universities must not be used to subsidise the entry of new providers to the HE sector.

Question 22:

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

Yes

No

Not sure

Please give reasons for your answer.

- i) The Green Paper emphasises that the Secretary of State would have a duty to respect the institutional autonomy of providers and academic freedom of staff, to ensure that ministers cannot interfere in particular institutions and to guarantee that these principles are protected. We strongly support this. However, it is directly contradicted by the proposed power for the Secretary of State to enable BIS or other partner organisation to enter and inspect higher education providers.
- 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.

- i) Cambridge notes that in the longer term the Government will be seeking views on removing the need for the Privy Council to be involved in connection with changes to governing documents. The University's own arrangements in this regard are governed by the Universities of Oxford and Cambridge Act 1923 and the University would expect to be fully consulted before any proposed changes to these arrangements were brought forward.
- ii) The University further notes the Government's desire to address the uneven playing field in terms of costs and responsibilities arising out of the treatment of HEFCE-funded providers as 'public bodies'. The University would again expect to be fully consulted before any proposed changes in this regard were brought forward.

Reducing complexity and bureaucracy in research funding (Part D)

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

- i) The University of Cambridge believes that the proposals to encourage the separation of teaching from research risk irreparable damage to the student and academic experience and the sector's reputation. The institutional framework must continue to reinforce the integration and unity of teaching and research in the university environment. This is crucial to ensuring that undergraduate and postgraduates are exposed to the constantly expanding boundaries of knowledge that academic staff active in cutting edge research can impart to their students.
- ii) The University welcomes the proposals in the Nurse Review to find more effective ways to funding interdisciplinary research and to tackle "grand challenges". It will, of course, be important for Ministers to give national leadership in relation to the nature of those challenges. However, the degree of direct detailed intervention proposed by the Nurse Review is of great concern. Research must be funded on the basis of excellence and independent expert advice must be central to the process to determine the interdisciplinary research priorities that will receive additional support.
- iii) It will be essential for the research community to retain complete confidence in the membership of the proposed Research UK Council and/or its advisory boards and in the RUK CEO. While we welcome the aspirations of Nurse to achieve greater use of common approaches across the RUK family where this is appropriate, it will be important to retain the opportunity to use specific approaches where they are necessary to meet the needs of particular funding streams and/or disciplinary requirements.
- iv) It is also essential that the ring-fence of capital funding is retained. Continued access to adequate funding for research is fundamental to enable the UK research base to retain its international standing.

Question 25:

- a) What safeguards would you want to see in place in the event that dual funding was operated within a single organisation?
 - i) We would propose that only a body with overarching regulatory responsibility for both research and teaching – the Office for Higher Education mentioned above – can be effective as a regulator for world-leading research and education. This body should assume HEFCE's current responsibilities for the Research Excellence Framework (and its successor) and QR funding.
 - ii) The core principle that dual support funding should be allocated on the basis of research excellence must be maintained. Dual support has enabled the UK to achieve and maintain standards of the highest research excellence in our universities. However, the proposal to transfer responsibility for QR funding to RUK does not, and cannot, provide adequate or appropriate safeguards for the dual support system.
- 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

- i) The University of Cambridge does not support the proposals to transfer responsibility for all aspects of dual support funding to Research UK. While we would welcome greater connectivity between the work of RCUK and the successor to HEFCE, any new structure must also preserve the system of funding research through dual support and in similar proportions as are currently in place. However, we do favour a degree of hypothecation to ensure that dual funding streams could not be changed.

Question 26: What are the benefits of the REF to a) your institution and b) to the wider sector? How can we ensure they are preserved?

- i) Whilst there are subsidiary benefits for Cambridge that arise from our strong performance in the REF, we believe that our international reputation and standing, and hence our ability to recruit the highest quality academic staff and attract the best students, is independent of our REF performance.
- ii) For the wider sector, the REF provides an important means of distributing QR funding in a way that should have some semblance to research excellence. However, this correlation is being weakened by the increasing emphasis on the importance of impact and other factors (in 2014, only 65% of the REF scores directly measured the quality of research).
- iii) To preserve these benefits, a number of actions should be taken:
- a. a high proportion of the marks awarded should directly measure research quality;
 - b. to increase the confidence of institutions in the REF, its integrity should be enhanced by:
 1. reducing, wherever possible, the potential for game-playing (e.g. by strengthening - or at least enforcing - the requirement that staff based outside their submitting institution should have a strong research link to that institution and that all HESA returnable members of staff should be included);
 2. increasing the international representation on panels and sub-panels (under current arrangements, judgements about 'world-leading quality' are made primarily by UK staff);
 - c. reducing grade inflation in marking so that the full range of marks is used and 'bumping into the ceiling' is avoided (in 2014 this was particularly noticeable in impact, where in some instances impact case studies covering a wide quality range were all awarded 4* marks);
 - d. removing the maximum of four papers that one individual can submit, as this discriminates against highly-productive researchers.

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

- i) Although reducing the burden of the REF is essential, this must not be at the expense of its integrity as a measure of research excellence and any metrics must be robust and appropriate to the discipline being assessed. The University is aware that the work of HEFCE REF Expert Advisory Groups, and more recently *The Metric Tide*, raised serious questions over the development of metrics of any kind that would be

sufficiently robust, particularly at the level of either author-level metrics or article-level metrics.

- ii) However, many positive actions could be taken that would significantly reduce the burden of the REF. Reduction in the number of impact case studies required would reduce the burden on both the academic most closely involved in the research and the external organisations (companies, public bodies, etc.) who are asked to provide supporting evidence and who do not generally benefit from providing such evidence. Reduction in the number of, and simplification/clarification of deadlines, potentially to two: one for impact, staff inclusion and publication and a later one for submission including hard copy and redacted outputs. However, the greatest benefit would be generated through more radical change to the REF process, in particular to reduce game-playing within the system.

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

- i) It is essential to improve the interoperability of the IT systems, a task which is made more challenging by the fact that these systems are produced by different parties and involve a wide range of participants – universities, funders and publishers. A key factor in improving interoperability will in turn be the proper governance of the process, to ensure that all parties are working towards and agreeing on the introduction of common data standards and the use of unique identifiers (such as ORCID). This will require joint development by all parties involved (universities, publishers and funders), and this joint development should have the objectives of increasing interoperability and allowing (open) data flow between all elements.
- ii) We are, of course, aware that interoperability pilots are already in progress, but the desired benefits will not be achieved unless all parties are involved (as evidenced by previous initiatives).

Do you have any other comments that might aid the consultation process as a whole?

Please use this space for any general comments that you may have, comments on the layout of this consultation would also be welcomed.

- i) Those answers categorised under 'not sure' must be given the same weight as those marked with 'yes' and 'no'. They contain equally important points.

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