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Email: [consultation.he@bis.gsi.gov.uk](mailto:consultation.he@bis.gsi.gov.uk)**Society for Research into Higher Education-Response to the BIS Green Paper****Fulfilling our Potential:  
Teaching Excellence, Social Mobility and Student Choice**

The Society for Research into Higher Education (SRHE) is an entirely independent and financially self-sustaining Learned Society supporting and representing an international community of higher education researchers across all disciplines, ranging from new and early career researchers through to scholars of international renown and reputation.

We welcome the publication of this Green Paper and the opportunity it offers to contribute to the consideration, impact, relevance and value of the proposals for change put forward.

Recognising that the Society is both an entirely politically non-aligned and independent organisation, representing individuals with different views and perspectives, the Society has focussed its efforts during the consultation on this Green Paper on fostering debate and providing opportunities for researchers to meet and discuss the proposals. We have also encouraged the consideration and inclusion of relevant research evidence in the responses of other organisations participating in our consultations.

In making our own response to the consultation the Society has maintained its independent stance and we have not sought to reflect in any great detail the range of views or catalogue differences of opinion that have been evident on many of the proposals. Instead, in our response we have sought to reflect the issues and concerns which have appeared to be, through our consultation meetings, universally or very commonly held and therefore in particular need of closer scrutiny and consideration.

We address these issues in the order in which they arise in the Green Paper.

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**PART A Teaching Excellence and Social Mobility**

The plans to recognise and encourage high quality teaching in universities are very widely welcomed. Focussing primarily on the quality of programmes and not on individual teacher contributions, recognising that judgements on teaching quality must be made across a range of different factors and not determined solely through the application of metrics and taking full account of disciplinary differences through the development of subject based measures of teaching quality are all issues which have wide support.

There is undoubtedly a case to be made to ensure that quality teaching receives equal attention to quality research and that research and teaching should be regarded as synergistically interconnected activities.

However, equally widely held, is the view that the Teaching Evaluation Framework proposals as set out in the Green Paper do not represent an appropriate means of supporting and recognising teaching quality. Commentating constructively on the TEF proposals in the Green Paper is not easy as the proposals presuppose that certain things will happen but at the same time there is a lack of detail and precision on process and on how the desired outcomes will be met. Within this context the proposals are broadly viewed as flawed in many respects, overly bureaucratic and unlikely to deliver the outcomes sought. We do not share the expressed view that incentives, most especially in the form of some link with variable tuition fees according to TEF evaluations, need to be introduced to drive change. These views are held across the spectrum of those who in general support the introduction of a TEF as well as those who, on balance, do not.

The Society, in common with most other learned societies, did not have the advantage of any prior engagement with the development stages of the Green Paper prior to publication and time available to consult with our community of researchers, and most especially to provide, as we would have far preferred, a fully referenced set of comments and suggestions, has therefore been very short. To maximise the engagement of this community we organised two main consultation events; the first on 9<sup>th</sup> December 2015 during our International Annual Conference, with 90 of the 430 delegates participating, and the second on 17<sup>th</sup> December 2015 with an invited group of 45 individuals representing a very broad range of organisations and interests from within and outside the Society.

From these consultations on the Green paper which the Society has organised the key issues which need to be revisited and rethought are these:

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### Timing and implementation

- **There is no clear rationale for the rush to create and implement a TEF in the time frame set out.** There is support for some form of TEF presenting a major opportunity to achieve something of lasting and real value. To launch a TEF in this form, in such a short time frame, risks wasting this opportunity to demonstrate the value and importance of excellent teaching and restore its prominence and status in the higher education experience.
- In the thirty years since the very first research assessment exercise through to the most recent REF 2014 a system has evolved which has real value, is now widely respected, within and outside the sector, and which has been subject, especially in the past 10 years, to rigorous scrutiny and evaluation of the process and the outcomes leading to the development of a rational and broadly equitable process. Introducing a parallel form of evaluation of teaching in higher education needs the same careful approach and developmental model if it to be a driver of long term gains.
- **Establishing a Year 1 base line.** Attempting to implement a TEF in 2017 on the basis of existing QAA reviews sends out all the wrong messages about setting up an objective and new system of recognising and valuing teaching quality.
- **Linking TEF evaluations with differential fees.**
  - **There is a strong case to be made that there should not be a direct link established to allow for differential fees based on TEF performance ratings.** The link between TEF ratings and variable fee levels is not well made and the overall value of doing so is unclear, other than to create and instil some element of ranking and market competition for no clear purpose which links directly with improving teaching quality, only one which seems relevant to the idea of offering student choice when this will be almost impossible to achieve in practice.
  - **TEF Ratings will be linked to past performance.** If the link with differential fees is retained then fee levels have the potential to relate to TEF ratings which are no longer current, giving rise to all manner of potential mis-selling and other accusations.
  - In addition to securing levels of research funds, significant reputational capital is derived from REF performance and developing the TEF should be approached in the same way. There are so many potential unintended consequences from establishing a link between higher fees and TEF outcomes. The level of differentiation is small in institutional terms but could be significant in terms of student behaviour and access, especially for those students least able to afford any higher fees. The availability of loans does not solve all affordability issues for many students, especially the access population we most wish to engage in higher education. The aggregation provisions could advantage some HEIs over others according to the breadth and mix of subject provisions and there is a real issue, as already noted, of fee levels relating to historic evaluations of teaching quality.

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- **The four TEF levels are not workable.** There is no clear basis on which these levels will be differentiated and obtained and the suggestion appears to be that useful metrics will develop over time. Implementation of such a framework ahead of the assessment and development of such measures risks making them obsolete even before discovery. What is entirely missing is a proper evaluation of how this system of assessment will actually drive up teaching quality on a sustained long term basis.
- **Retention of some existing QAA provisions should be considered.** Whilst there are as many critics as there are defenders of the present QAA systems there does seem to be real concern about the wholesale abandonment of the QAA process and considerable support for some form of QAA process to work in tandem with any form of TEF. This would build on considerable expertise in process and methods for improving teaching quality.

**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.**

The TEF proposals in the Green paper are set firmly in the context of perceived benefit to students and value to employers and this forms the basis of the prime question asked of respondents.

The primary questions which needs to be posed here are “what is the key purpose of the TEF and what is the value or benefit of the TEF?” Within the consultation document this remains insufficiently precise.

Using the same terminology as the REF signals a clear intention to equate the two processes. The REF however has a clear end purpose-the distribution of research funds according to specific, expertly formulated indicators of originality, significance, rigour and impact.

The end purpose of the TEF, as defined within the Green Paper, seems to be, as this question suggests, to provide employers and students (and by association their families and schools) with information and evaluations on teaching quality in order to determine the overall quality of an institution, and again by association, the overall quality and value of any degree.

This in our view is not the right objective. The value of a TEF approach needs to be to raise teaching quality in all higher education institutions, across all disciplines, over a period of time and on a sustained long term basis. The potential short term consequences in terms of reputational damage to both individual HEIs and to the reputation of UK higher education nationally and internationally through a very rushed implementation of these proposals is a real and troubling concern.

**Page 5 SRHE Social Mobility and widening participation****SRHE**73 Collier Street  
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E srheoffice@srhe.ac.uk[www.srhe.ac.uk](http://www.srhe.ac.uk)**Chapter 4 Social Mobility and widening participation**

The majority of the content relating to social mobility appears to derive from an overall assessment that progress on access and widening participation (AWP) generally has been at best inadequate and at worst poor, especially for people from disadvantaged backgrounds. Whilst there is some evidence in support of this, it is equally important to recognise that across the vast majority of HEIs the commitment to AWP is huge and that efforts made to achieve greater and wider participation have been a priority concern across the sector.

In determining next steps towards AWP goals, and especially if considering links between TEF evaluations and AWP achievements, we cannot ignore the overwhelming research evidence that:

- Social background has a profound and pervasive influence on access to opportunities at every stage of the transition from childhood to labour market participation.
- Numeracy, defined in terms of HE entry qualifications, confers positional advantage in terms of access to prestigious universities and graduate job opportunities.
- The most important influences on HE participation and associated labour market outcomes are social background and gender.

Reference: Elias and Purcell Institute for Employment Research University of Warwick Future Track data.

**Part B Opening the sector to new providers**

We have no fundamental position on opening the sector to new providers and do not subscribe to the notion that all public provision is good, all private bad or indeed the converse. What we do need to be cautious about is the history of attempts to use such measures to create and manipulate a market in UK higher education which is neither real nor a level playing field.

Among concerns that have been expressed and which in our view merit further scrutiny are:

- allowing some for-profit providers to draw on public funding
- implications, especially in regard to appropriate use of public funds if privatising former publicly-funded HEIs
- the devaluing of DAPs and University Title, especially if including highly specialised operations focussing on narrow course provision.

**Page 6 SRHE Part B Opening the sector to new providers (continued)**

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- potential damage to the international reputation of UK universities
- enabling a tiered system to evolve in which private providers exist under a different and less rigorous regulatory framework to public providers

In many aspects of the Green Paper, and in this aspect most especially, we consider the case for the necessity for primary legislation very well founded and strongly advocate the need for primary legislation to follow from democratic debate in both houses. The fact that no Coalition or Conservative HE reforms have been debated in the Houses of Parliament since 2010 is a matter of concern.

The justification for recognising and accrediting new providers must be that they bring something of value and quality which enhances and extends our higher education provision and is not solely pursued as a means of introducing market competition within the sector.

The reputation of UK higher education nationally and internationally is something worth preserving and to ensure that this is achieved there must be an acceptance that private providers, especially those with a for profit business model and shareholders to satisfy, do sometimes cut corners and do sometimes fail to meet the highest standards. This can be evidenced from reports in the UK [National Audit office Report December 2014 <https://www.nao.org.uk/investigation-financial-support-students-alternative-higher-education-providers-2/> and within the US [US Senate report July 2012. <https://www.gpo.gov/fdsys/pkg/CPRT-112SPRT74931/pdf/CPRT-112SPRT74931.pdf> ]

The existence of a private and public higher education framework in the United States is frequently evidenced as a model system by those advocating increased participation from private and particularly for-profit providers.

The US Senate report 2012 referred to above found evidence of:

- exorbitant tuition fees
- aggressive recruitment practices
- poor student outcomes
- greater likelihood of students at for-profits defaulting on public loans
- public funds spent on marketing and pocketed as profit
- regulatory evasion and manipulation

In some cases operators of for-profit colleges in the US have faced criminal charges or other legal sanctions.

Opening up higher education to new providers has to be achieved on the basis of the same level of regulation and scrutiny for all providers equally and a clear audit trail of how public funds are used and absorbed within all providers.

**Page 7 SRHE In conclusion****SRHE**

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**In conclusion**

In submitting these contributions to the Green Paper consultation the Society has sought to reflect the balance and breadth of opinion expressed through our efforts to engage higher education researchers across the sector in debating and evaluating these important issues and proposals.

We have available to us a huge range of relevant research data as well as the scholarly input of researchers specialising in higher education policy and implementation which we want to make available to BIS as this consultation process moves forward. The issues referenced in this submission represent only selected highlights from the detailed assessments made of the proposals for higher education.

The Society for Research into Higher Education would welcome the opportunity to contribute further and in more depth as government plans evolve and hope that we will be afforded the opportunity to do so.

Submitted on behalf of the SRHE Governing Council Board of Trustees

Helen Perkins  
Director Society for Research into Higher Education