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

You can reply to this consultation online at:

https://bisgovuk.citizenspace.com/he/fulfilling-our-potential

A copy of this response form is available at:


The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

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

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This response is on behalf of SEEC (www.seec.org.uk ) a registered charity committed to supporting student mobility and development through the use of academic credit. We have focussed on the consultation questions related to matters in this area.

Please return completed forms to:

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email: consultation.he@bis.gsi.gov.uk
Please tick the box that best describes you as a respondent to this consultation.

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<th>Alternative higher education provider (with designated courses)</th>
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<tr>
<td>Alternative higher education provider (no designated courses)</td>
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<td>Awarding organisation</td>
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**Public sector equality duty**

**Question 1:**

a) What are your views on the potential equality impacts of the proposals and other plans in this consultation?
b) Are there any equality impacts that we have not considered?

☐ Yes ☐ No ☐ Not sure

Please provide any further relevant evidence.

No comment.

**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.

Students make decisions about which course to study on the basis of a range of factors (distance from home, urban/rural, student life, friends, etc.). Many students have limited choice about which university to attend because family, work or other commitments mean that they are geographically constrained. For some, particularly part-time students, a work move may necessitate a change in location of study. For others they may find, despite the range of information available to them on application, that they are on the wrong course or at the wrong institution. Employers, seeking to support the development of their staff, may wish to know whether qualifications or experience gained in or through the workplace can be counted towards higher education qualifications.

We believe that information requirements, particularly for the higher levels of the TEF, should include whether providers have robust and effective procedures for the recognition of prior learning (RPL).

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.

We are strongly supportive of a level playing field.

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?

No comment.

Question 5: Do you agree with the proposals on:

a) what would constitute a ‘successful’ QA review
b) the incentives that should be open to alternative providers for the first year of the TEF

☑ Yes  ☐ No  ☐ Not sure

c) the proposal to move to differentiated levels of TEF from year two?

☑ Yes  ☐ No  ☐ Not sure

Please give reasons for your answer.

We consider these to be sensible transitional proposals.

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.

There is clearly more work to be done in this area before a final judgement is made but we are broadly supportive of the direction of travel. We would like to see more explicit reference to sensitivity to the mission of the institution in the manner in which panels are selected and operate.

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.

No comment as we feel this is a matter for response from institutions.

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.
We welcome the fact that there will essentially be the same number of levels in the TEF as the REF. We believe that the designation of the TEF levels needs to find expressions which carry similar impact to those used in the REF in order to sustain the comparison i.e. the TEF levels should use such terms as sector-leading (cf REF world-leading, 4*); excellent (cf internationally excellent 3*); recognised (recognised internationally, 2*); and foundational (recognised, 1*). The definitions, and associated metrics, need to include the ability of the institution to support student transfer internally or with credit from another organisation. In an environment where students may initially study close to home with private providers or other institutions for financial or personal reasons, the ability to progress on to study at other institutions to enhance career prospects or for personal development is important and should be recognised.

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.

A matter for institutional comment.

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.

We are broadly supportive of these but are concerned about the metrics that will be used to make assessments.

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.

There is clearly more work that needs to be done in order to more closely identify the metrics that will be used. We have some concerns that these may not capture the needs of non-traditional students and those operating in non-standard university environments such as those studying in and through the workplace. The experiences of part-time and non-traditional students are not well captured within the exiting common metrics derived from national databases.
We have an additional concern that the metrics, unless carefully designed, will stifle innovation and creativity in developing provision to support non-standard learners. In this context, the meaning of ‘Student commitment to learning – including appropriate pedagogical approaches’ and the associated metrics are unclear.

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.

Although we note that some of these groups, in some contexts, outperform traditional non BME students.

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.

If the system is to have value then there needs to be regulation and appropriate processes for supporting improvement and dealing with failure. These should pay due regard to different institutional missions.

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

Supporting social mobility needs to be seen in the context of life-long learning. Much of the discussion and many of the proposals currently focus on students entering directly into higher education at or around 18 years of age.

We would like to see much more consideration given to social mobility of:

- Part-time learners
- Mature learners
- Workplace learners
- Direct entrants with advanced standing

Social mobility can be enhanced for learners who choose to enter higher education, or re-engage with HE, at various stages in their life. The TEF, and its associated metrics, should recognise and value this and the associated institutional responses.
Question 13:

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

‘Non-standard’ learners should know that the institution has in place appropriate support for their learning journey. The needs of mature, part-time, work-based etc learners are different from those of traditional learners. Applicants should be reassured that the institution to which they are applying can cater for their needs.

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

No comment.

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.

No comment.

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.

No comment.

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

No comment.

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.
No comment.

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.

We note that expanding and diversifying the HE sector is relatively high risk and there will be institutions and courses that have relatively short lifetimes. The use of credit, which is the primary role of SEEC, has an important role to play here in terms of enabling students who may be affected to continue with their studies at an alternative provider.

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.

In principle we believe that there is a need to look at the range of institutions that have developed and how they work together to provide an effective infrastructure. In terms of the use of credit to support learner progression much work has been undertaken over the last 25 years to harmonise systems but there is still more to be done. It is currently not clear where within the new infrastructure responsibility for this development will lie.

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?

No comment.

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.
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

No comment.

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

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

No comment.

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.

No comment.

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

- Yes
- No
- Not sure

Please give reasons for your answer.

No comment.

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.

No comment.

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

No comment.

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

☐ Yes  ☐ No  ☐ Not sure

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

No comment.

Reducing complexity and bureaucracy in research funding (Part D)

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

No comment.

Question 25:

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

No comment.

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.

No comment.
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?

No comment.

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

No comment.

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

No comment.

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.

No comment.

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