Department for Business, Innovation & Skills

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

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

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

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

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14th January, 2016

Alison Haines
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Dear Ms Haines

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

The Engineering Professors' Council (http://epc.ac.uk) represents the majority of academic engineers in the UK, with 81 university engineering faculty members comprising over 6,500 academic staff. It is a "nominating institution" for the purposes of the Research Excellence Framework (REF) and four panellists from REF2014 sit on its governing Committee, which also numbers a Vice President of the Royal Academy of Engineering, a President of the Institute of Measurement and Control and an immediate past President of the Institution of Civil Engineers, as well as four university pro Vice-Chancellors.

We enclose our response to the Consultation: Fulfilling our Potential: Teaching Excellence, Social Mobility and Student Choice and have focused on two of its sections:

- Teaching Excellence Framework (TEF) (Part A: Chapters 1-3). **In developing our position statement on this, we have been joined by our sectoral group colleagues, the Council of Professors and Heads of Computing (http://cphc.ac.uk/) and so this should be regarded as a joint submission.** This forms our response to questions 2-11 (4 pages).
- Reducing complexity and bureaucracy in research funding (Part D: Chapters 1-2, Questions 24-28 – 2 pages).

We believe that others are better placed to respond to the remaining sections.

We would be pleased to elaborate on any on our response if invited to do so.

Yours sincerely

Professor Stephanie Haywood

President

Engineering Professors' Council and Council of Professors and Heads of Computing

Response to the Teaching Excellence Framework (TEF) proposals: Position statement

1.   Preliminary remarks

1.1   We concur that if the framework is to be introduced quickly, the proposals for year 1 of the TEF are acceptable. However, the proposals for future years need further thought, debate and research and are not yet fit for the purpose intended.

1.2   For example, as currently proposed, it needs to be made absolutely clear to users of the information provided by a Teaching Excellence Framework to which level of study and which subject disciplines it applies. Clearly, where an institutional level award is given, as proposed in the Green Paper for the early years, there will be an implication that it applies to all subjects, all programmes and all levels. The reality of the situation will be that departments in a single institution will be different – with different mixes of undergraduate and postgraduate students and differing stages of organisational development. The ambition to ensure the framework encompasses all modes of delivery and all levels is therefore appropriate but will bring with it considerable burden and complexity and will only be meaningful at disciplinary level. Issues will arise from external stakeholders who are less familiar with the nuances of the system, for example, overseas applicants and their funders who could misinterpret "the new teaching league tables" to serious detrimental effect, possibly leading to the withdrawal of a substantial amount of overseas government support funding for overseas students wishing to attend UK institutions which are perceived as being outside the "top rank".

1.3   While there are clear benefits (not least time, effort and cost) to the inputs used in the evaluation framework being drawn from existing sources, the metrics proposed are, in our opinion, flawed and risk producing perverse outcomes. Metrics are highly context sensitive. For example, location impacts employment prospects and salaries, subjects with high proportions of formal contact hours and challenging content tend to attract lower National Student Survey (NSS) scores – yet those same students asked again some years after graduation and with experience in the workplace behind them are likely to provide a much more positive response. What appear to be the most obvious output measures – including whether students are in graduate-level employment, their salary levels and degree classification, are problematic. For the degree classification issue, while it is possible and desirable to set minimum thresholds (which in engineering, programme accreditation certainly does) it is impossible to maintain the benefits of distinctive research-informed/inspired teaching and have a single 'standard' outcome. This would require an external national examination. Given the range of ability and prior achievement in different student cohorts, attempts to measure against a single output standard would be meaningless. Further, there is a strength that comes from the diversity of UK engineering and computing courses and the diversity of expertise that this creates among graduates. The proposals, as currently outlined, appear to risk convergence on a single syllabus. The proposal on the use of retention statistics requires very great care to be taken that the unintended consequence of incentivising a race between institutions to 100% retention would inevitably mean some students being allowed undeserved passes. Lastly, we agree that the need for a robust measure of learning gain is attractive, but there is currently no agreement as to what this should look like. We await the results of the Higher Education Funding Council for England (HEFCE) study with interest to see if there are measures that can readily evaluate this in a way that recognises institutional diversity and is meaningful and acceptable to the sector.

1.4   Most importantly, the current proposals seem to define teaching excellence only in terms of teaching delivery. This risks allowing the situation where it becomes acceptable for staff to be excellent at delivering content which is of poor quality and/or out-of-date. The former Teaching Quality Assessment - TQA (administered by HEFCE) operated at subject level and reviewed the student learning experience under a number of headings. These headings included: Learning Resources, Curriculum (this features neither in the current TEF proposals nor the NSS, yet in engineering it is fundamental to the professional institution accreditation process); Learning Experience; Student Support (both within the department and the university level welfare services and so on); Quality Assurance Mechanisms and Student Achievement.

1.5   We therefore propose an alternative approach. If quality assurance (and accreditation visits for disciplines with established professional bodies) were more nuanced and evaluated strengths and weaknesses in a more detailed way (akin to the former Teaching Quality Assessment framework) this information would benefit both students and other stakeholders when making choices regarding particular universities, departments or courses. The evaluation/assessment visit would need to be positioned as a developmental process with a supportive relationship between the HEI and the assessor/assessment mechanism, with careful communication and positioning of any negative feedback if HEIs are to continue to innovate in programme content and delivery. This would add value for all and need not be significantly more onerous or resource intensive. We believe it would also more appropriately reflect disciplinary difference.

1.6   We acknowledge that much of what we propose in what follows relies on input measures as well as output measures. But that is an inevitable recognition of the core principle on which our position is based: that we are developing independent learners with valuable contributions to make to both employers and wider society.

See over for position statement…/

2. Position statement

2.1.1 We underline our long-standing commitment to the principles of delivering a high quality educational experience and good outcomes for students which reflect:

- the diversity of the sector;
- encouragement of social mobility;
- regional and national need.

2.1.2 University is not school. We aim to develop independent learners and equip them with the tools they need to have productive and fulfilling careers. In doing so, we need to reflect the educational context more broadly: teaching is but one element of this and students themselves need to be recognised as essential stakeholders in the process. We therefore propose a '**Learning Excellence Framework (LEF)'** which encompasses:

- providing an appropriately resourced learning environment;
- providing appropriate support to students which recognises and responds to educational background, diversity and disability;
- providing dynamic and up-to-date curricula and helping students to demonstrate how their learning meets the needs of employers and wider society– whether in industry, the public and not-for-profit sectors or in academia and whether it be in the UK or elsewhere in the world.

2.1.3 In addition, universities are diverse and dynamic institutions operating in competitive environments. The portfolio of disciplines in any institution will be developing at different rates, thus, the effectiveness with which the above can be delivered can only be meaningful at the disciplinary level.

2.1.4   It is essential that the cost of implementing and operating the framework does not exceed any gain (financial or otherwise) for the sector. We therefore propose that a variety of current evaluation and assurance methods are adjusted and combined to avoid duplication and provide consistency and coherence. The outcome could be presented as a "performance dashboard" against each of the above themes which could be scored at three levels – gold, silver, bronze (or unclassified), as for Athena SWAN. In this way, we can avoid an average single score for the LEF and stakeholders can be provided with a more nuanced view of the environment in which their learning is taking place. It also has the advantage of providing more practical information on which universities can act to improve the environment for learners.

2.2 Providing an appropriately resourced learning environment

2.2.1 The quality assurance and/or accreditation frameworks should encompass checking:

- that the university has a range of appropriate promotion pathways for its academic staff in place, at least one of which encompasses educational achievement;
- that the resource allocation model in place at departmental (discipline) level provides appropriate and sustainable financial resources to support both the physical environment/equipment needs and operational needs, including appropriate staffing (both lecturers, support staff and technicians);
- that there is fair and transparent workload allocation in place that supports the development of early career staff and that there is recognition of the necessity to respond appropriately to student feedback;
- there is strong, structured leadership for learning and teaching excellence and continuous improvement is demonstrated at department and institution level.

2.2.2 Indicators of the level at which the department has met the criteria (gold, silver bronze) could be developed.

2.3 Providing appropriate support to students which recognises and responds to educational background, diversity and disability

2.3.1 The quality assurance and/or accreditation frameworks should encompass checking:

- progress of the department towards acquisition of Athena SWAN accreditation (criteria for gold, silver and bronze already in place);
- the nature of the institution's Office for Fair Access (OFFA) agreements and the wider financial and pastoral support provided for students.

2.3.2 It is worth noting that in Scotland, this is measured and monitored via Outcome Agreements between the HEI and the funding council.

2.4 Providing dynamic and up to date curricula and helping students to articulate how their learning meets the needs of employers

2.4.1 The disciplines we represent have long-standing and close relationships with a range of professional bodies and with employers. The engineering disciplines have worked closely with the Quality Assurance Agency (QAA) over many years in developing the relevant subject benchmark statements and UK-SPEC which seeks to articulate clearly the outcome of students' learning. Where appropriate, assessment/accreditation visits should examine how these are used in programme development and how this is communicated to students. Visits could also review:

- the proportion of academic staff with relevant professional qualifications or demonstrable continuing professional development;
- the department's encouragement and support for students to join professional bodies at student level and ensuring the programme prepares students for entry to the body at professional level;
- whether the department can demonstrate meaningful interaction with employers, including Industrial Advisory Boards, visiting lectureships, contextual learning opportunities, encouragement of staff to gain professional qualifications/accreditation, where appropriate;
- whether students are encouraged to gain skills in the international context e.g. review the proportion of students taking Study Abroad years;
- whether students are encouraged to take up learning opportunities outside their home universities, e.g. Study Abroad or contextual learning opportunities which attract academic credit or other recognition for example, on their Higher Education Achievement Report, where appropriate.

Engineering Professors' Council

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?

Rationalisation of the mechanisms that support the HE sector would help a great deal. Not only should this improve organisational efficiency, but also strengthen strategic thinking, facilitate better problem solving through facilitating multi-disciplinary research and therefore enable us to tackle the "grand challenges" and create better impact. Almost no UK HEIs have the expertise to tackle major challenges alone. An environment that is more joined up can bring many benefits to the UK, as well as to researchers and institutions.

Question 25:

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

Appropriate management structures will be needed with a much greater focus on reporting and the scrutiny of the *outcomes* from the expenditure of the two funding streams. There would need to be appropriate governance (perhaps extending to "Chinese Walls") and transparency to ensure that the benefits of dual funding were maintained and that the organisation did not become a means to ensure books balance by moving funds around between the two.

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?

[x] Yes   ☐ No   ☐ Not sure

It is essential that the principle (and the practical reality) of dual support is maintained and that the HEFCE quality-related fund and the RCUK funding are not merged or viewed as interchangeable. Measures need to be put in place to ensure appropriate strategies that consider a range of national and international considerations are in place. We need to avoid a situation where change is not driven by a well thought out strategy and coherence is undermined by switching between the funding streams to "balance the books". We can learn from other countries where academics and other key stakeholders are seconded in to similar national research organisations to support the delivery of research rather than only being involved either at the stage strategy is drafted or at the stage at which applications are assessed as frequently happens in the UK now. Such measures would ensure the research agenda is informed by the research community and that an appropriate balance between pure and applied research is maintained.

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?

Such exercises promote the importance of research, encouraging high standards. The recent emphasis on the impact of that research is beneficial. REF forces the sector and institutions to consider and evaluate their research strategies and to ensure that research funding and time is invested well.

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

There are two main sources of burden on the sector:

(i) The burden on HEIs in putting the submissions together
With rationalization across the sector (as articulated in question 24) there are opportunities to reduce the burden.   While we are not against the use of metrics in principle as a supporting mechanism to help manage the burden of the exercise, we do not believe they can be used alone owing to the limitations of citation-based metrics for certain subject areas, including engineering, which are likely to be material for the medium to long term and an element of peer review needs to be maintained. (See Main Panel B report from REF2014). Open and centralized data sources could be better employed to inform evaluation of submissions such that submissions become more about collation of already-published data and information and less about crafting a response.

(ii) The burden on the sector in conducting the assessment
Again, use of known and published sources would be helpful as would use of a blind peer review approach using electronic means as far as possible. Some refinement of the supporting material for the impact part of the assessment is needed to avoid duplication (particularly between the environment and impact templates) and to assist assessors in accessing the underpinning research.

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

We concur with this extract from *Metric Tide (July, 2015)*: *Indicators can only meet their potential if they are underpinned by an open and interoperable data infrastructure. How underlying data are collected and processed – and the extent to which they remain open to interrogation – is crucial. Without the right identifiers, standards and semantics, we risk developing metrics that are not contextually robust or properly understood. The systems used by higher education institutions (HEIs), funders and publishers need to interoperate better, and definitions of research-related concepts need to be harmonised. Information about research – particularly about funding inputs – remains fragmented. Unique identifiers for individuals and research works will gradually improve the robustness of metrics and reduce administrative burden.*

This will however, all take time and the systems are not yet in place to enable their use in reducing the burden.