Russell Group response to the HE Green Paper and the Nurse Review

1. Summary

Overview

- We welcome this opportunity to respond to the HE Green Paper and the independent review of the Research Councils by Sir Paul Nurse. The genuine openness of the questions and proposals is a helpful start for future discussions.

- In particular, we welcome the Government's re-stated commitment to excellent research, the dual support system and the Haldane Principle, underpinned by real-terms protection of research funding in the recent Spending Review.

- Putting students at the heart of the HE system is an important focus for the Green Paper and this fits with our own commitment. Excellent teaching typically builds on and is intimately linked with excellent research and this is central to the outstanding student experience Russell Group universities deliver.

- There are already many mechanisms in place to ensure quality, equality, and improved student outcomes, but we are not complacent. Our universities are constantly seeking ways to innovate and improve their offer and welcome ideas as to how best to achieve this. Indeed a huge amount of time, effort and resources have been devoted to improving the student experience and broadening access at our universities over the last decade and more.

- We welcome the intention to reduce bureaucracy and burdens on universities with more proportionate and risk-based regulation – but the challenge is whether this can be delivered in practice through the Teaching Excellence Framework (TEF) and other Green Paper proposals.

- It would also be a concern if the proposals, when put into practice, have a detrimental impact on university autonomy in terms of 'who', 'what' and 'how' we teach, or if changes to the research funding structure start to undermine basic research and the UK's competitiveness over the long-term. The proposed split between teaching and research funding is a significant risk that could have unintended knock-on consequences for both teaching and research quality.

- The Green Paper, Nurse Review and Spending Review together herald another substantial period of disruption and change for universities with impacts to be felt over many years. On-going engagement is essential and we look forward to working with the Government in continuing to deliver excellent teaching, research, innovation and impact from the UK's leading universities.

Teaching Excellence and Quality

- The Government is right to recognise the national success story that is Higher Education in the UK. Russell Group universities offer excellent teaching and have in place robust systems and processes to assure the quality of teaching and the quality of the wider student experience.

- There are already numerous ways that improved quality of teaching is incentivised e.g. through a fees-based, more competitive system, more demanding and vocal students, NSS, requirements of PSRBs, QAA etc. We would therefore like to be reassured that the TEF will add significant value to those existing mechanisms without adding to regulatory burden. We are concerned that the TEF as proposed currently could increase this burden in the long-term.

- We welcome that our universities will, in principle, be allowed to increase fees by inflation from 2017/18 as there are already significant shortfalls in funding for teaching – in particular for high cost subjects. However, we are concerned about linking the ability to increase fees by inflation beyond 2017/18 to the achievement of higher TEF levels while the TEF will still be very much in the developmental stage.

- Any TEF should use measures that best reflect the quality of teaching. A basket of measures should be used, complemented by a short qualitative statement setting these in context. Robust and credible measures will take time to develop, ideally through piloting and review, and it would be wrong to attach too much significance to early iterations of the TEF.

- Nor would we wish to see the TEF being used to deliver the Government's wider HE policy agenda – where many other measures, programmes and regulations are already in place. Widening participation and social mobility are important policy objectives to which our universities are committed, but the TEF should be focused on teaching and learning, rather than on other distinct and separate agendas.

- It is important the TEF works in close alignment with or significantly minimises the need for an additional QA system and processes so as to avoid duplication and any unnecessary extension or layering of regulatory burden. The intention that TEF level 1 will be achieved by securing a successful review with the QAA, or through similar review, is therefore welcome.

- Universities will not flourish if they are overregulated and it is important that resources should be focused where problems of quality are most likely to occur. QA should therefore be risk-based and proportionate, with regulatory resources focused on new providers and areas of weakness.

Social mobility and widening participation

- Russell Group universities are investing significantly in initiatives to address the root causes of the under-representation of students from disadvantaged backgrounds and have made very considerable progress to date in widening participation and enabling student success.

- Including widening participation-related measures in the TEF would be a blunt instrument and may fail to recognise the breadth of institutions' innovative

initiatives to promote access and student success, as well as to take account of the root causes of under-representation.

- The Office for Fair Access (and other related agencies) is most helpful when identifying and facilitating the dissemination of effective practice, drawing on experience both within the UK and more widely, rather than setting more targets or issuing directives. We all share a common aim of increasing the number of students from disadvantaged backgrounds in our universities so it is important institutions should be able to determine their own priorities and focus resources appropriately, within the constraints of an already heavily regulated environment.

- Our universities are strongly committed to fairness and equality in admissions. However, the introduction of 'name-blind' admissions could actually hinder efforts to improve progression to HE for disadvantaged and under-represented groups and will present a number of practical difficulties in implementation.

- The national targets to improve access for disadvantaged students and those from BME groups should be sufficiently flexible to take local context into account. In addition, BME students are not a homogenous group and careful thought must be given to how targets can differentiate accordingly.

New providers, student protection and funding for teaching

- There is a substantial need for quality assurance of lower-performing institutions and for new entrants to the HE market. A robust probationary period for new entrants is required to protect the UK's reputation for high quality teaching.

- Universities should be allowed to make their own appropriate arrangements in terms of student protection against course or institutional closure.

- Where resource and capital funding for teaching sits in the new landscape requires careful consideration. Creating a dichotomy in funding for teaching and research could lead to a greater separation of the two on the ground in universities, rather than fostering more strategic approaches where teaching and research can reinforce each other.

Regulatory architecture

- One of our key concerns is the proposal to split HEFCE's responsibilities for teaching and research funding into separate bodies when, in the planning and management of leading universities and academic staff, the two are so closely linked.

- The HE regulatory system should be clear and transparent. The proposal to create separate bodies for funding teaching and research could make it harder for universities to plan and manage. HEFCE currently provides a helpful buffer between universities and government and we would be concerned if this is lost with the creation of the OfS and redistribution of other key functions that HEFCE provides.

- It is important that the costs associated with the OfS are contained. If a subscription model is used to finance the OfS then subscriptions should be proportionate to the risk individual universities represent (and therefore the extent of regulation they require) rather than being based on the size of the university (e.g. student numbers).

- The proposal to exempt universities from the Public Body requirement to respond to requests under the Freedom of Information Act (2000) is welcome.

Research

- Changes to the research landscape could offer opportunities to align more closely some of the policies and practices in the current system, but there are also a number of significant threats and challenges which we urge the Government to consider seriously to protect the vitality, autonomy and comparative strengths of the current UK research funding system.

- Improvements to the current system could be made by an enhanced Research Councils UK (RCUK) which would be a less radical option than the creation of a new body in the form of the proposed Research UK (RUK), with potentially fewer risks. If RUK is created, it must remain closely engaged with the academic community and excellence must continue to be the primary criteria for funding.

- The combination of stable core funding and competitively awarded grants provided through the dual support system ensures the diversity and breadth of research in the UK. We appreciate the wording in the Green Paper and Nurse Review about preserving the dual support system, and there is now an opportunity to take this further by enshrining in legislation a commitment to support two distinct research funding streams in the UK in perpetuity. Measures to protect the principle of dual support are important to guard against the risks of allocating the two funding streams within one organisation.

- The REF is a fundamental part of the UK's dual support system for research funding. Whilst there is scope to improve the REF for the future, it should be recognised that the RAE/REF has succeeded in driving up the quality of research in the UK by supporting a research culture focused on excellence.

- Metrics may be seen at first sight as a quicker and cheaper alternative to peer review, but it is essential to be aware of the many shortcomings in their use. Importantly, metrics lack the element of judgement that is at the heart of the long-established peer review process.

- We would welcome a lighter touch REF and there are some areas where metrics can be useful, but peer review should remain at the heart of the process, with metrics used where appropriate to complement and aid human judgement.

- We look forward to contributing to Lord Stern's review of REF over the coming months, in particular looking at ways to reduce the burden of the REF without diluting its rigour and international reputation.

2. Overview

2.1 We welcome this opportunity to respond to the HE Green Paper (*Fulfilling our potential: teaching excellence, social mobility and student choice*) and the independent review of the Research Councils by Sir Paul Nurse (*Ensuring a successful UK research endeavour*), both published in November 2015. This submission follows the same general thematic headings as the Green Paper, with research and the Nurse Review as the final section. Comments relating to particular questions in the Green Paper are flagged, for ease of reference.

2.2 The Government's re-stated commitment to excellent research, the dual support system and the Haldane Principle in the Green Paper and Nurse Review, underpinned by real-terms protection of research funding (both resource and capital) in the Spending Review are very welcome. These commitments rightly recognise the positive impact universities have on the economy, society and culture right across the country and internationally. Our leading universities are engines of growth and are world-class assets for the UK[1].

2.3 Putting students at the heart of the HE system is an important focus for the Green Paper and this fits with our own commitment.

2.4 **In leading universities, excellent teaching typically builds on and is intimately linked with excellent research** – and our universities provide a world-class learning experience at both undergraduate and postgraduate level. Our report (and supporting film), *A passion for learning: The student experience at Russell Group universities*, explores how our universities provide a first-class learning environment for students to flourish, how they support students to get the most from the education on offer and how they give graduates the best chance of success in the wider world[2].

2.5 There are already many measures in place ensuring quality, equality, and improved student outcomes, but we are not complacent. Our universities are constantly seeking ways to innovate and improve their offer and welcome ideas as to how best to achieve this. Indeed a huge amount of time, effort and resources have been devoted to improving the student experience and broadening access at our universities over the last decade and more.

2.6 **We welcome the intention to reduce bureaucracy and burdens on universities with more proportionate and risk-based regulation** – but the challenge is whether this can be delivered in practice through the Teaching Excellence Framework (TEF) and other Green Paper proposals. The potential costs associated with the TEF and with funding of the new Office for Students (OfS) regulatory body is a concern. The complex structure of fee caps and TEF levels needs further consideration and it is not obvious that the proposed incentives are enough to offset the potential cost, burden and risk of engagement in TEF beyond level 1. Indexation of the tuition fee cap is welcome, but will bring in relatively little additional income if inflation remains

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[1] For an overview of the research impact of Russell Group Universities, see our recent report and film: *Engines of growth – the impact of research at Russell Group universities*: http://russellgroup.ac.uk/policy/publications/engines-of-growth-the-impact-of-research-at-russell-group-universities/

[2] http://russellgroup.ac.uk/policy/publications/a-passion-for-learning-the-student-experience-at-russell-group-universities/

historically low. Indeed, the costs for institutions of the TEF assessment process may exceed that increased fee income.

2.7   It would also be a concern if the proposals, when put into practice, have a detrimental impact on university autonomy in terms of 'who', 'what' or 'how' we teach, or if changes to the research funding structure start to undermine basic research and the UK's competitiveness over the long-term.

2.8   The creation of the Office for Students and separate arrangements for the dual funding of university research will lead to a split in the funding and regulation of teaching and research, which are currently the responsibility of HEFCE. This may have unintended consequences, for example in terms of new data requirements and a risk that no single regulator will have an overview of the financial viability of universities in receipt of research funding[3]; there are also likely to be knock-on consequences for both teaching and research quality.

2.9   There are still some significant unknowns in terms of the future regulatory environment, the details of TEF (subject of a further consultation), how the Higher Education Innovation Fund (HEIF) and other funding streams and activities covered by HEFCE will be supported in future, and how fast many of the changes signalled in the Green Paper, Nurse Review and Spending Review will be implemented. Much will depend on whether legislation is required, or if more can be done by working with universities and building on best practice. Engagement with universities throughout this process is essential and we look forward to working with Government as proposals for the HE system are considered further.

3. Teaching Excellence and Quality

3.1   The Government is right to recognise the national success story that is Higher Education in the United Kingdom. Indeed, higher education is one of this country's major assets, teaching over two million students per year, with an international reputation for quality and high levels of student satisfaction. Russell Group universities offer excellent teaching and are working hard to ensure all those with the potential to succeed have the opportunity to do so.

3.2   We welcome the emphasis in the Green Paper on ensuring the quality of higher education for the future, but, as we set out in our recent evidence to the BIS Select Committee, there are already numerous ways that improved quality of teaching is incentivised[4]:

(a)   The fees-based system has driven and continues to drive up teaching quality. But the system is still embryonic and needs time to really take effect and then bed down, and there are features of the new system that could be improved.

(b)   Information flows are a key factor in any properly functioning market and these have certainly improved, for example: with the Key Information Set (KIS) , the National Student Survey (NSS) and a wide range of information available on and through the

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[3] The existing memorandum of assurance and accountability between HEFCE and institutions is fit for purpose, and it would not be desirable for universities to have separate agreements with both OfS and Research UK.
[4] http://russellgroup.ac.uk/policy/policy-documents/bis-select-committee-on-the-future-of-higher-education/

UCAS and Unistats websites. However, a review of how relevant information is organised and accessed would be appropriate.

(c) Moreover, there are already many ways by which quality of teaching and learning is assessed and assured including:

    i. Internal quality assurance mechanisms
    ii. The external examiner system
    iii. Quality Assurance Agency (QAA) reviews
    iv. Extensive audit and reviews by a wide-range of Professional, Statutory, and Regulatory Bodies (PSRBs).

3.3   The result of all of these factors can be seen in very positive statistics about our universities. For example: in 2014 the NSS recorded student satisfaction at a 10 year-record high – with 88% overall satisfaction scores at Russell Group universities[5]; employers continue to value our graduates extremely highly, for example according to the QS world university rankings 2015, 11 of the top 50 universities in the world, as ranked by employers, are Russell Group universities. And our drop-out rates are extremely low: the latest HESA statistics show an average continuation rate for young full-time first degree entrants at Russell Group universities of 97%.

3.4   We are not arguing that everything is perfect by any means, but that there are already many mechanisms in place to drive up quality and these are continuing to evolve effectively as expectations in the HE system rise. There is a real danger that the TEF – in particular in its later iterations – could add a significant new burden on universities and seems at odds with the Government's desire for less red tape elsewhere in the economy.

3.5   However, we recognise the Government is keen to introduce a new teaching framework and have already submitted ideas to BIS as to how that could be formed and implemented. We make further suggestions about the future shape of the TEF below.

Quality assurance

3.6   Our universities will not flourish if they are overregulated and it is important resources should be focused where problems of quality are most likely to occur. Quality Assurance (QA) should therefore be risk-based and proportionate, with regulatory resources focused on new providers and areas of weakness. We welcome that the Green Paper highlights this as the Government's aim. Any new QA system must have three core components:

- It should be demonstrably risk-based

- Standards should be consistent, but regulation should be proportionate

- Any new HE providers should be subject to the most rigorous QA tests.

3.7   Universities with a strong track record of success, and which have been delivering high quality education for a long time, should be subject to considerably less inspection and bureaucracy than newer institutions. This will also provide for the most efficient use of public funds.

3.8   It is important the TEF works in close alignment with or significantly minimises the need for an additional QA system and processes so as to avoid duplication and any unnecessary extension or layering of regulatory burden. The intention that TEF level 1

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[5] The overall NSS satisfaction score at other (non-Russell Group universities) in 2015 was 85%.

will be achieved by securing a successful review with the QAA, or through similar review, is therefore welcome (*question 5* in the HE Green Paper).

Assessing teaching excellence

3.9 If the TEF is to be introduced we would prefer that it supports universities in managing and delivering high quality teaching and learning in diverse ways. It should help encourage esteem and reward for high quality teaching staff, something which leading universities already take very seriously. The Government could help provide even more backing for this through publicly-funded scholarships for staff to promote high quality teaching in universities.

3.10 The proposed pre-requisites for entering the TEF, such as compliance with the Competition and Markets Authority (CMA) and potentially having to use the Grade Point Average (GPA) system for degree classification[6] could undermine efforts to boost teaching quality if resources have to be used elsewhere (*question 4*).

3.11 Similarly, there is a risk the TEF may skew investment in teaching quality towards measures focused on the chosen metrics, at the expense of other activity that students and employers value – and potentially at the expense of academic values.

3.12 Indeed, it is not clear the TEF will be effective in driving up the quality of teaching and we would argue there are other more effective ways of doing that by building on the current system. However, there is a real risk the TEF will add to the burden of regulation on universities – and in particular in its later iterations if conducted at the level of individual disciplines (*question 5*, *question 7*).

TEF measures

3.13 It is important the TEF is seen to have credibility. There may be significant scrutiny and secondary reporting of the TEF results so it is vital to ensure the measures used are validated and accurately reported. **The focus of the TEF must remain solidly on teaching quality.** For example, if the NSS is used as a component metric in the TEF then teaching quality, rather than other elements, should be the focus, and the NSS has a section (currently questions 1-4 in the survey) devoted to this.

3.14 The TEF assessment should reflect the extent to which university teaching is already subject to scrutiny by PSRBs and avoid duplication here (something HEFCE has said in its recent consultation on the QA system that it also supports). These bodies already exercise exacting quality assessment standards on the courses they validate on behalf of their respective professional bodies.

3.15 We agree that, in any extension beyond level 1, the TEF should be informed by **a basket of measures that will enable different aspects of teaching excellence to be highlighted**. Ideally, this basket should include a measure to reflect the relationship between high quality teaching and high quality research activity. The learning environment is a key underpinning factor in the best teaching and we would wish to see the TEF recognising the importance of investment in high quality teaching facilities, IT and library resources, fieldwork and other relevant support. It is also

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[6] Although the Green Paper says GPA is not a pre-requisite, it also states that 'it will be taken into account when making assessments' for higher levels of TEF, so in practice this could become a *de facto* requirement, with all of the additional costs and administrative burden this may require. We recognise there are some strengths in GPA systems, and some universities are planning moves in this direction anyway, but use of GPA should be for universities to decide for themselves rather than being a prerequisite.

important to recognise that university is not school and independent learning alongside lectures and group work is a core part of a high quality undergraduate experience. Excellent teaching should lead to excellent outcomes in terms of continuation with courses and then onward progression into professional employment and/or further study, so an ambition to include a genuine outcome component in TEF is worth considering further in the technical consultation (*question 10*).

3.16 Diversity across HEIs should be recognised and encouraged, so it is important universities are able to choose additional measures for inclusion in any assessment alongside any measures common to all. This 'Core Plus' model and ability to select from a basket of measures also enables universities to compete effectively and develop their distinctive offerings.

3.17 The basket of measures should not include simple 'value-added' measures as these would not capture the great diversity and value of educational experiences, for example: academic content, growth in confidence, team-working ability, and entrepreneurial skills. Any 'value-added' metrics risk creating perverse incentives to move effort and resource away from the rich and diverse mixture of skills and personal development opportunities graduates need into a narrower model of higher education (*question 10*, *question 11*).

Qualitative measures

3.18 The TEF should include an appropriate qualitative component in addition to quantitative measures. This could be in the form of a short institutional narrative to set the context for the quantitative component, and in particular any additional metrics chosen. This would also provide an opportunity for universities to showcase particular examples and to provide supporting comments, such as feedback from PSRB reviews. The REF 2014 exercise included a section on the research environment, so this could be a useful point of comparison between research and teaching at a particular institution (*question 11*).

Proposed approach to differentiation and award as the TEF develops

3.19 Experience of developing the Research Excellence Framework and its precursors suggests the TEF may take a number of iterations over many years to develop and refine. The Government should, therefore, be cautious of attaching too much weight to the first outputs from a new framework. **Iterations beyond TEF level 1 should be piloted and reviewed before being considered for wider roll-out.**

3.20 Creating a system where there is a binary divide between institutions whose teaching is judged as 'excellent' and those whose teaching is 'not-excellent' would require very fine decisions at the margin for those institutions whose teaching quality is judged to fall close to that dividing line. This is particularly true given the impact (in terms of fee income and reputation) for any institution whose teaching is judged to be 'not excellent'. However, the proposal to introduce numerous levels of TEF with rolling assessment will require even more precise judgements to be made (e.g. between levels 2 and 4) as to the relative excellence of teaching when the TEF is still being developed (*question 8*).

3.21 There is a systemic risk to the international reputation and standing of UK Higher Education (and potentially to the reputation of individual institutions) from a poorly developed, misused or misinterpreted TEF.

TEF panels

3.22 With robust judgements needed on the TEF submissions made by institutions – in particular any qualitative element and any fine distinction between various TEF levels if they are introduced – the membership of the TEF panel will be critical and it is important this should include senior, and respected, individuals from leading universities who are fully able to evaluate teaching excellence (*question 6*).

Linking the TEF to tuition fee caps

3.23 We welcome that our universities will, in principle, be allowed to increase fees by inflation from 2017/18 as there are already significant shortfalls in funding for teaching – in particular for high cost subjects. However, we are concerned about linking the ability to increase fees by inflation beyond 2017/18 to the achievement of higher TEF levels while the TEF will still be very much in the developmental stage (*question 5c*).

3.24 Allowing the maximum fees cap to rise in line with inflation will help to ensure funding for teaching is maintained in real terms. Since 2012 the value of the maximum tuition fee has been steadily eroded by inflation, so we welcome the Government's decision to allow indexation, although we would have preferred this to have happened sooner. Restoring the real value of £9,000 tuition fees would be welcome.[7]

4. Social mobility and widening participation

4.1 We want every student with the qualifications, potential and determination to succeed at a Russell Group university to have the opportunity to do so, whatever their background.

4.2 The recognition that strong progress has been made in enabling the most disadvantaged students to access higher education, as well as those from under-represented groups, is welcome. Russell Group universities in particular have made significant progress in widening access to their institutions, but we are far from complacent or content with progress to date:

(a) In 2013-14, 77% of young full-time first-degree entrants at Russell Group universities were from state schools and colleges, up from 68% in 1997.[8]
(b) In 2015, students eligible for free school meals were 65% more likely to enter high tariff institutions including Russell Group universities than they were in 2011.[9]
(c) BME students are also now more likely to be accepted onto courses at Russell Group universities: numbers of new black students have increased by 39% between 2010 and 2014, numbers of Asian students accepted have risen by 14% and 'Mixed' ethnicity student numbers have risen by 28%.[10]

4.3 Our universities are committed to ensuring they provide excellent teaching and an outstanding experience to all students. However, **the TEF should be focused solely**

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[7]The £9,000 maximum fee, fixed since 2012, is expected to be worth approximately £7,730 by 2017/18; to provide the equivalent buying power of 2012, the fee would need to be over £10,400 in 2017/18.
[8] HESA performance indicators for 2013/14 (calculation by the Russell Group)
[9] UCAS 2015 end of cycle data
[10] UCAS 2014 end of cycle data

on teaching and learning excellence and not on other distinct agendas, such as widening participation and social mobility (*question 4*, *question 12a*).

4.4   Including access measures within the TEF would ignore the root causes of under-representation including attainment at school and differences in pupils' aspirations and attitudes (which are referenced in the Green Paper).[11] The attainment gap means selective universities only have access to a narrow pool of highly-qualified students from disadvantaged backgrounds,[12] and the most effective way to address this is by raising standards in schools and tackling broader societal issues, rather than by targeting the TEF.

4.5   Performance on outcomes for disadvantaged students does not necessarily reflect teaching excellence. Research shows that while academic support is key there are many other factors that contribute to student success.[13] This is why, as well as providing an excellent teaching and learning experience, Russell Group universities invest in a wide range of student support mechanisms, in particular to ensure the retention of students during their years of study.[14]

4.6   Moreover, focusing on institutional performance on access and student success for disadvantaged and under-represented groups through TEF metrics could skew the focus of widening participation work – potentially acting as a disincentive for institutions to engage in long-term outreach initiatives, which deliver a broader impact on social mobility. For example, many of our institutions begin engaging early on with primary school-focused outreach activities, the results of which cannot be demonstrated for many years.[15] Similarly, institutions may be deterred from collaborating with each other in the same region as this makes it difficult to attribute outcomes between partners.[16] **The proxy measures included in the TEF could prove to be a blunt instrument and may fail to recognise the breadth of institutions' innovative initiatives to promote access and student success.**

4.7   Linking performance in widening participation to potential fee increases through the TEF would also be unhelpful and could impact on the ability of institutions to set their own priorities on widening participation.

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[11] Our publication *Opening Doors: Understanding and overcoming the barriers to university access* contains a detailed analysis of the root-causes of under-representation: http://www.russellgroup.ac.uk/policy/publications/opening-doors-understanding-and-overcoming-the-barriers-to-university-access/

[12] In 2010/11, fewer than 8,500 free school meal (FSM)-eligible students took three A-levels and only 546 achieved three or more A* or A grades. Source: Parliamentary question, [116023] (9 July 2012)

[13] Arc Network report to HEFCE and OFFA "Literature review of research into widening participation to higher education" (2013)

[14] For example, the PASS scheme Queen Mary University of London provides course-based mentoring to first year students, enabling them to discuss study-related problems and get general advice from higher-year undergraduates in their subject. The scheme aims to help first years develop confidence and make a smooth transition into university life.

[15] For example, as part of the University of Manchester's Primary Roadshow a team of staff, student ambassadors and advisers visit local schools and undertake a series of hands-on activities that introduce Year 5 pupils to the different dimensions of university life.

[16] For example, our universities work together to co-deliver biennial teacher conferences for target schools in low-participation areas to reach teachers most in need of support. Russell Group universities are also collaborating through HEFCE's National Networks for Collaborative Outreach to develop teacher CPD resources.

The future role of the Director of Fair Access (and OFFA)

4.8 The Office for Fair Access (and other related agencies) is most helpful when identifying and facilitating the dissemination of effective practice, drawing on experience both within the UK and more widely, rather than setting more targets or issuing directives. We all share a common aim of increasing the number of students from disadvantaged backgrounds in our universities and helping to ensure they succeed once there so **it is important institutions should be able to determine their own priorities and focus resources appropriately**, within the constraints of an already heavily regulated environment (*question 12b*).

4.9 Individual universities face different challenges, and tailor their approach to admissions, access and widening participation accordingly. No 'one size fits all' model is appropriate. There is a risk that targets (and particularly unrealistic targets) could force universities to divert resources in favour of activities which appear more impressive in the short-term, with potential knock-on negative consequences for broader WP outcomes and engagement with hard to reach groups.

4.10 Enacting widening participation initiatives can be an iterative process as universities gather evidence on what works best to refine their activities. Therefore, the proposal that targets be imposed on those who 'fail to make progress' raises questions over the timeframes in which universities are expected to demonstrate impact and could stymy universities' attempts to develop innovative new solutions to problems and to pursue longer-term projects.

4.11 HEFCE-commissioned research on international approaches to widening participation finds that national policy will only be effective where there is 'enough flexibility to respect the diversity of institutions', and focusing too closely on the need to demonstrate impact within a relatively short timescale can be detrimental to 'longer-term aspiration building and attainment raising'.[17]

4.12 The root causes of under-representation are many and complex. They are founded in a child's earliest years and compounded at each stage of a young person's life. Indeed, there is evidence to show educational disadvantage starts, not with the UCAS form, but in the cradle. While we can't solve deep-rooted problems in society, universities can and do have an important role to play. For example, Russell Group universities are investing significantly in initiatives working with schools and colleges across the UK to help raise students' attainment and aspirations, and improve information, advice and guidance:

(a)   In 2016-17, the 20 Russell Group universities in England will be spending £243 million from additional fee income alone on scholarships, fee waivers, bursaries and outreach activities aimed at the most disadvantaged - £9 million more than in 2015-16, with additional investments being made across the Devolved Administrations.[18]

(b)   Our guide *Informed Choices*, first published in 2011, provides advice on the best subject combinations for a wide range of university courses at Russell Group universities as well as advice on the best choices for students if they don't know what they want to study after school and need to keep their options open.

(c)   Our *Opening Doors* publication highlights some illustrative examples of how our universities are proactive in delivering a range of innovative initiatives to tackle the root-causes of under-representation - from outreach activities working with primary and secondary schools in deprived areas, and providing continued professional

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[17] BIS, 'National strategy for access and student success in higher education' (2014)
[18] OFFA access agreements, 2016-17

development for teachers, to offering alternative routes to our courses and additional financial support to students who need it.

4.13 Ultimately, however, **the problems of under-representation of certain groups in higher education can only be addressed by taking a holistic approach** that enables government, schools, universities and parents to work together to tackle the issues involved. It would also be inappropriate to impose a single high-level definition of disadvantage across all universities.

4.14 Universities work hard to ensure students are retained and succeed, but it is not necessary to implement a centrally reported model for this work which could limit the flexibility of our institutions to provide innovative solutions. Russell Group universities already offer pastoral support to help students feel part of university life, or help with skills and work experience to improve employability.[19] This type of support helps to boost student success: for example, evidence shows that Black and Minority Ethnic (BME) students at Russell Group universities achieve significantly better outcomes compared with those at other universities.[20] Imposing a 'student lifecycle' approach on top of universities' own systems is not necessary.

The proposal to introduce 'name-blind' admissions

4.15 Our universities are strongly committed to fairness and equality in admissions, doing everything in their powers to ensure all applicants are treated equally, but the implementation of a 'name-blind' admissions system would be fraught with practical difficulties and may be counter-productive.

4.16 There is no evidence to suggest unconscious bias is a problem in HE admissions; indeed, participation in HE by ethnic minority groups continues to rise and recent UCAS data shows the offer rates to different ethnic groups are close to expected values. [21,22] Evidence shows students from disadvantaged backgrounds are less likely to apply with the right subjects and the right grades than their more advantaged peers, which highlights an on-going need for good information, advice and guidance (such as our own *Informed Choices* guide[23]). Other aspects of their applications are also likely to be of lower quality.[24]

4.17 **The introduction of 'name-blind' admissions could hinder efforts to improve progression to HE for disadvantaged and under-represented groups.** In particular, it will make it more difficult for universities to identify and track applications from students with whom they have existing relationships, for instance as part of long-term outreach and engagement programmes. This could affect the ability of institutions to continue to support these students as well as to assess the effectiveness of their

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[19] Russell Group universities undertake a range of initiatives targeting BME pupils, for example, to improve both their progression to, and success within, highly selective institutions. The University of Birmingham mentoring scheme provides an opportunity for BME students to meet and network with successful BME business and community leaders in Birmingham, and gain a practical insight into the mind-set, business and personal skills needed to succeed in employment.

[20] When degrees awarded to medics and dentists are taken into account alongside Firsts and 2:1s, ethnic groups at Russell Group universities achieve significantly above average degree outcomes. BME graduates of Russell Group universities also outperform their counterparts at other universities in progressing to professional employment and higher level further study. Source: HESA data

[21] 'SPA report: The existing evidence base and considerations for 'name-blind' applications to higher education' (2015)

[22] UCAS 'Offer rates to different ethnic groups close to expected values' (2015)

[23] http://russellgroup.ac.uk/media/5320/informedchoices.pdf

[24] Sutton Trust 'The Personal Statement: A fair way to assess university applicants?" (2012)

outreach initiatives. In addition, many Russell Group universities use information about a student's background and personal circumstances to provide context to applications and to assess each applicant's potential and suitability for a course. Recent research by Supporting Professionalism in Admissions (SPA) found that "a 'name-blind' approach may hamper HE providers' work in strengthening fair admissions through contextualisation" (*question 12c*).[25]

4.18 There is also a real risk that a 'name-blind' system could place significant administrative burdens on universities and there are a number of practical implications associated with the proposal. For example: some students will be asked for interviews, making it impossible to operate a 'name-blind' system at this stage of the process; some courses require other background checks to be made which cannot be done 'name-blind'; and relevant material in students' written personal statements may need to be redacted, which would then be of disadvantage to the student. Indeed there is evidence from the US (from the University of Berkeley and from UCLA) that introducing an equivalent policy of 'colour-blind' admissions has led to a significant decline in enrolments from African American and Latin American students.

Targets for specific groups of under-represented students

4.19 As well as targeting disadvantage, the Green Paper includes a proposal to increase the number of BME students going into higher education by 20% by 2020. But attainment varies widely by ethnicity: at A-level the gap between those achieving the highest grades from different ethnic backgrounds is substantial, and there is evidence to suggest minority ethnic students apply in much greater proportions to certain courses – which also tend to be the most over-subscribed.[26,27] BME students are not a homogenous group and careful thought must be given to how targets can differentiate accordingly. We note, for example, that white working-class boys are the most under-represented ethnic group in university education nationally. It is therefore possible that targets to increase participation by students from disadvantaged backgrounds and BME groups may actually be mutually contradictory.

4.20 A more nuanced approach could be taken to categorising disadvantage recognising that HEIs use a range of indicators in their widening participation activities, not just low participation in HE. No single available metric can be used as an accurate proxy for disadvantage. The Government's targets to improve access for disadvantaged students and those from BME groups should also take account of local context.

Alternative finance models

4.21 The Government's proposal to develop an Alternative Finance model for students that is Sharia-compliant is welcome, and we look forward to this being introduced in due course alongside the existing student loan system.

4.22 We hope similar arrangements will also be made available for postgraduate students as the postgraduate loan scheme is introduced.

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[25] 'SPA report: The existing evidence base and considerations for 'name-blind' applications to higher education' (2015)

[26] Attainment at A-level by young people from different ethnic backgrounds (Parliamentary question, [149093] 15 April 2013)

[27] UCAS 'Offer rates to different ethnic groups close to expected values' (2015)

5. New providers, student protection and funding for teaching

Opening up the market to new providers

5.1   Part B of the Green Paper proposes opening up higher education to a much wider range of providers with a new set of validation arrangements. We do not have any objection in principle to the growth of alternative providers, but we do have concerns about this development. For example, doing this too quickly, and without adequate controls in place, may result in gaps in oversight and could store up significant problems for the future. UK universities currently enjoy a strong reputation globally, and there may be wider knock-on consequences if assurance processes are not robust. There is also the possibility of unintentionally tipping the playing field in favour of alternative providers – as is currently the case with FOI legislation and the nature of arrangements that private medical schools benefit from in attracting international students (where they are not limited by a cap). We also worry about the increase in the number of HE institutions and students in the current climate when funding is already very stretched.

5.2   **There is a substantial, and on-going, need for quality assurance of lower-performing institutions and for new entrants to the HE market** (*question 16*). A robust probationary period is therefore required for new entrants, as we set out in our response to the two recent rounds of QA review consultation[28].

5.3   It is important that the Office for Students is appropriately resourced for its role as "Gatekeeper" for new providers. However, this burden should NOT fall on established providers.

Provider exit and student protection

5.4   It is right the new architecture for regulating the HE sector should include measures to protect students in the event of institutional failure or closure of courses. However, **a risk-based and proportionate approach is required and universities should be able to make their own appropriate arrangements as they do already** (*question 17*).

5.5   Any across the board requirement to hold a reserve fund, bond or similar as part of a student protection scheme could mean vital funding from tuition fee income is held back from teaching and investment in universities where the risk of provider exit is extremely low. The costs of managing provider exit should NOT fall on other HE providers, who have managed their provision well.

Teaching funding

5.6   The Further and Higher Education Act 1992 gives HEFCE powers to fund teaching and research and also to fund the provision of facilities and any related services. With the proposals to dismantle HEFCE, and with it the provisions in the Act, careful consideration will be needed about where teaching funding (both resource and capital funding) sits in future (*question 18*).

5.7   We would suggest the formula for allocating teaching funding should be devised by the Office for Students, or another suitable NDPB, and that this should be overseen by an independent board (similar to existing arrangements with HEFCE).

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[28] See: http://www.russellgroup.ac.uk/policy/policy-documents/quality-assessment-review-consultation/

5.8 **One of our key concerns is the proposal to split HEFCE's responsibilities for teaching and research funding into separate bodies** when, in the planning and management of leading universities and academic staff, the two are so closely linked. Excellent teaching in leading universities is informed by and builds on excellent research and, equally, research is often informed by teaching. For example:

- Research active academic staff bring vibrancy to teaching by drawing on their current research; they can also instil the need for students to become critical thinkers, team players and problem solvers, informed by their own research experience

- In many areas, excellent student teaching will be informed and enriched by what is happening at the leading edges of science and technology

- The undergraduate experience is typically enhanced by students undertaking their own research projects, supported by staff and postgraduates

- And undergraduate students will often have access to high quality research facilities and other resources (including industrial partners) that would not otherwise be available.

5.9 Given that a core focus of the Green Paper is on teaching excellence and ensuring quality in high education, it is unfortunate these fundamental links between research and teaching are not recognised more strongly. We appreciate reassurances that the intention was not to separate the two, but that this is an unintended consequence of the proposals. **Creating a dichotomy in funding for teaching and research could lead to a greater separation of the two on the ground in universities, rather than fostering more strategic approaches where teaching and research can reinforce each other.**

6. Regulatory architecture

6.1 The Green Paper is a mixture of deregulation and new regulation (through the TEF). Most of the new regulation bears particularly on universities that are delivering excellent teaching. We welcome that the Green Paper has risk-based and proportionate regulation as an ambition, but we remain concerned about the overall increase in regulatory burden on universities, with costs (and other resource implications) that rise every year. We now need to see 'risk-based and proportionate' regulation happen in practice (*question 21*).

6.2 In particular we welcome the ambition to develop a regulatory framework where monitoring of low risk providers will be reduced. Achieving this will allow the Government to focus its efforts instead on new and higher-risk providers.

6.3 We welcome the Government including "an explicit duty for the OfS to respect academic freedom and institutional autonomy", but this needs to be realised in approaches to TEF and access.

6.4 There are also inherent tensions that need to be addressed in having an Office for Students as the main body with regulatory powers over universities. **Universities are complex businesses engaged in research, innovation and teaching, and they are often highly internationalised too.** Russell Group universities, for example, support over 300,000 jobs UK-wide, have a total economic output of over £32 billion a year

and are a major UK export industry, generating overseas earnings of over £4 billion annually. Many are also the biggest employers in their regions.

6.5 Leading universities play an increasingly important and diverse role locally, regionally and nationally and in the UK economy and society overall – helping to drive growth and jobs, delivering productivity gains, creating an unparalleled soft-power influence for the UK and contributing to our rich cultural life and heritage. The OfS needs to operate with due care and recognition of this wider perspective, particularly the global dimension of many UK universities, helping to safeguard institutional autonomy.

6.6 **HEFCE currently provides a helpful buffer between universities and the relevant government department and we would be concerned if this is lost with the creation of the OfS and redistribution of other key functions that HEFCE currently provides.** Other HEFCE functions – for example, acting as a charity regulator, auditor, the body responsible for regulating compliance with Prevent, and monitoring financial sustainability – will need to be allocated to other NDPBs, and the OfS itself should also be created as an NDPB.

6.7 Similarly, because of the focus on teaching in the Green Paper, there is no mention of where key funding and activity streams currently supported by HEFCE will sit in future. In particular, it will be important to maintain, and ideally strengthen, the Higher Education Innovation Fund (HEIF), which is vital in facilitating innovation, collaboration with industry and other partners, and the impact of our research.[29] Announcement of the fifth round of the UK Research Partnerships Investment Fund (RPIF) in December 2015 was very welcome. We look forward to this stream continuing as a strategic initiative, helping to bring significant external investment into important capital projects at the UK's leading universities.

Funding the Office for Students

6.8 The Green Paper proposes that the Office for Students will be funded by subscriptions from universities. This could add considerably to the financial burden on universities and **it is important the costs associated with the OfS are contained. Subscriptions should be proportionate to the risk that universities present** (and therefore the extent of regulation they require) rather than being based on the size of the university (e.g. student numbers). In particular, any subscriptions from existing universities should not be used to subsidise the entry of new providers to the HE market through provision of gateway regulation and services by the OfS (*question 21b*). The Government should manage the transition from the current regulatory regime (HEFCE and OFFA) to the OfS so the impact on universities is minimised.

Further deregulation

6.9 We welcome the proposal to remove the requirement for changes to the governing documents of HEFCE-funded providers to be approved by the Privy Council. This will help universities to modernise and streamline governance processes.

6.10 We have concerns in relation to the proposal that HE Corporations (HECs) should have the power to dissolve themselves without the agreement of the Secretary of State. In particular, this may give rise to problems where providers that dissolve have unfunded pensions liabilities. There is a need for thorough consideration to be given to

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[29] Successive Government-commissioned reviews have called for a long-term commitment to maintain HEIF including the Dowling (2015) and Witty (2013) reviews.

how the framework might protect other universities from unintended increases in their employment costs (e.g. in relation to any additional pension liability).

Public Body requirements

6.11 **The proposal to exempt universities from the Public Body requirement to respond to requests under the Freedom of Information Act (2000) is welcome.** As noted in the Green Paper, the FOI requirement has created a competitive imbalance in the UK higher education market (as it does not apply to alternative providers) and increasingly burdensome reporting requirements for established universities.

6.12 Universities take their responsibility to provide information to students and the public very seriously. They are subject to numerous regulatory requirements on information reporting, including financial health reporting, publication of data on student satisfaction and graduate employment, and publication of information on courses of study. Universities are already highly accountable, regularly reporting to many public and other bodies such as the Funding Councils, HESA, QAA, OFFA, OIA, Research Councils, BIS, Health Education England, the Home Office, the Department of Health and a wide-range of Professional, Statutory and Regulatory Bodies. The additional responsibilities created by FOI represent an unnecessary extra burden.

6.13 If the FOI requirement is withdrawn, some universities may still wish to use aspects of the FOI framework in responding to requests for information, but statutory exemption would place that choice with the university (*question 23*).

6.14 However, wider than FOI, the general data burden on universities needs to be given further consideration. For example, our universities currently need to make some 550 separate data returns to the Government or government agencies each year. It would be helpful if this regulatory burden could be reviewed, and where feasible, reduced and streamlined (*question 13b*).

7. 'Reducing complexity and bureaucracy in research funding'

7.1 This section of our response addresses questions 26-28 in the Green Paper and issues raised in the recent review of the Research Councils by Sir Paul Nurse.

The research landscape

7.2 We welcome the emphasis in the Green Paper that Government investment in research is vital, that there is an ongoing commitment to the Haldane Principle and that the Government's intent is to **'ensure the integrity of the dual funding system'**. We endorse all of these principles. It is essential to ensure they are not undermined in the proposed new structure for research funding and care will be needed to avert unintended consequences.

7.3 The Chancellor has confirmed the Government will be taking forward the recommendations of Sir Paul Nurse's independent review and, subject to legislation, will introduce a new body – Research UK (RUK) – which will work across the seven Research Councils. It was also announced the Government will look to integrate Innovate UK into RUK, but the Green Paper itself does not confirm whether HEFCE's current research roles, including design and implementation of the REF and allocation of Quality Related (QR) funding, would also come under Research UK. The lack of

clarity here is challenging and it would be helpful to consult further on more detailed proposals as they emerge, prior to any implementation.

7.4 For over a century, Research Councils have very effectively supported the UK's research endeavour. They are greatly valued by their communities and we support the recommendation in the Nurse Review that the identities of the Research Councils within Research UK should remain distinct, with holding budgets and discipline leadership preserved at the level of the individual Research Councils as at present, and the strengths of autonomy maintained.

7.5 However, the current system is not perfect and there is scope to realise improvements to enhance its effectiveness. It is possible an overarching research funding body, or strengthened RCUK, could generate efficiencies in the system by streamlining funding processes and reducing administration costs. This may help ensure funding for research itself is protected, or even boosted, and efficiencies made here might even allow the Research Councils to consider funding a higher proportion of the full economic cost of research. Indeed, these improvements could potentially be made through an enhanced RCUK - which would be a less radical option than the creation of a new body, Research UK, with potentially fewer risks.

7.6 <u>We would like to be reassured that if Innovate UK is moved into RUK then this will also come with a concomitant transfer of funding.</u> It would be counterproductive to fund Innovate UK at the expense of investment in basic research, which provides the pipeline for new technologies and knowledge underpinning innovation.

7.7 There could also be **opportunities to align more closely some of the policies and practices in the current system**, such as aligning definitions of impact, designing compatible open access rules and making research information systems more interoperable. Closer alignment could support the creation of a single cross-Research Council Impact Accelerator Account, which would help to support interdisciplinary research through proof of concept to commercialisation and optimise access and use of the funds. Similarly, closer links between Innovate UK and the Research Councils could help to deliver Hermann Hauser's welcome recommendation that Catapults should work more closely with universities.[30]

Dual support

7.8 The combination of stable core funding and competitively awarded grants provided through the dual support system ensures the diversity and breadth of research in the UK and has played a vital role in supporting the international excellence of the UK's research ecosystem.[31]

7.9 QR research funding, currently distributed by Higher Education Funding Councils as an un-hypothecated funding stream, complements funding allocated via the Research Councils. Awarded as a block grant to universities based on REF outcomes, it enables institutions to plan ahead and invest strategically. Indeed, it is vital in providing a stable base of research funding over reasonably long time periods (i.e. known for six or seven years in advance depending on the frequency of RAE/REF exercises) when other areas of funding are uncertain.

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[30] *Review of the Catapult network*, Dr Hermann Hauser (November 2014) https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/368416/bis-14-1085-review-of-the-catapult-network.pdf
[31] The importance of the dual support system has been recognised explicitly in the House of Commons Science and Technology Committee report on 'The Science Budget', (November 2015) as well as in Paul Nurse's report 'Ensuring a successful UK research endeavour', for example.

7.10 Critically, QR funding provides the core investment base for novel research and facilitates institutional flexibility to respond to new opportunities and challenges. In particular, it supports the concept of the 'well-founded laboratory' in which work supported by the Research Councils, EU initiatives, business and others can take place. QR is especially important in supporting social sciences and arts and humanities research, while the QR Charities stream is critical for underpinning university research collaborations with the UK's strong charity sector.

7.11 It is essential the dual support system is preserved for the long term and we would like to see this embedded firmly in the new arrangements by:

(a) **Enshrining in legislation that there will be two distinct funding streams for research <u>in perpetuity</u>** – this would mean any change would require a further Act of Parliament
(b) Putting dual support at the core of the mission statement of Research UK
(c) Ensuring budget lines are completely transparent, with an obligation to report annually on the amounts allocated to QR and each of the Research Councils – publishing the budgets and accounts publically each year will allow the research community and others to scrutinise the system and ensure the separate lines in dual support do not become blurred
(d) Maintaining clearly separate peer review-based mechanisms by which funding is allocated via the Research Councils on the one hand and to universities based via block grants (QR) on the other.

7.12 Whilst it is not yet known what will happen to HEFCE's research functions, whichever organisation takes responsibility for QR funding, it is essential there is appropriate expertise in the organisation to deal with issues pertaining to research and research funding; QR should continue to be kept at an arm's length from Government.

7.13 We would also propose to keep the balance between Research Council funding and block funding more or less the same. As noted by the House of Commons Science and Technology Committee, *"any significant changes to this [dual support] system, including the balance of funding between research councils and university funding councils, would require a clear justification, which has yet to emerge."*[32] As noted above, enshrining transparency as a key principle of RUK will allow for scrutiny and help to protect funding, but a stronger mechanism may also be needed by which evidenced justification would have to be provided for altering the balance between the two funding streams.

7.14 Key separate elements of QR funding, in particular the Charity QR stream, need to be maintained. It is also important to ensure there is adequate funding to provide high quality training for postgraduate research students, who play such a critical part in research.

7.15 If HEFCE's research functions are brought under Research UK this new body would be responsible for England-only QR funding, but UK-wide Research Council funds. Due regard should be given to these particular national complexities and there should be clarity on the scope of RUK's various functions and where these might relate to the UK or to England only, if appropriate. Specifically, it should be noted that if funds were to be moved between these two budgets it would have knock-on implications for different universities depending on their location.

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[32] Report on 'The Science Budget' (November 2015).

Governance

7.16   We note that Sir Paul Nurse specifically recommends against merging the Research Councils with the creation of RUK: "Merger into a single Council is not appropriate as it would be disruptive, distance research funding from the research community, reduce agility, and critically make it difficult to recruit the highest quality leadership at the individual discipline level."[33] Instead, Sir Paul sees RUK as being able to speak with a more coordinated approach and increased strategic capacity – which, if achieved, would be very welcome.

7.17   RUK should not be seen as the only voice of research in the system. The UK's leading research-intensive universities should continue to play a strong role in providing advice and input to Government; and any major changes or new proposals in the research system should be subject to further consultation.

7.18   Indeed, the structure and governance of the proposed **RUK needs to build on strengths of the existing system**, which is closely engaged with the academic community.

7.19   The Chief Executive of RUK will potentially have more power than any other research leader in the current system. Having oversight of the Research Councils, Innovate UK and potentially QR funding and the REF would give them responsibility for the majority of public research and innovation funding in the UK,[34] managing a budget of over £5 billion a year. Nurse recommends that the CEO should be a "highly distinguished scientist", but this person must also have exceptional management skills, an understanding of how government and universities work, and appropriate experience managing a large organisation and substantial research budget. To maximise the effectiveness of the new structure, it is essential the very best people are placed in these key roles.

7.20   The proposals in the Nurse report raise a number of questions about whether there would be increased intervention from Government in the research system – in particular with the role of the proposed new Ministerial Committee.

7.21   If this Ministerial Committee is genuinely a mechanism (as Nurse describes) to facilitate discussions between policy makers and the 'research endeavour', to improve Government's capacity to respond to new scientific developments and to address the Government's overall capacity for research, the Committee could potentially serve a useful function. However, there are no details on how the Committee would interact with RUK and what level of influence it would have over RUK's activities. It is essential that the Haldane Principle continues to be respected so that decisions on where and how to fund research are made independently of government – this is a key strength in the UK system that leads to the best research by motivating researchers to deliver the most creative outcomes. **The focus for funding research must remain firmly on research excellence and a critical mass of research excellence**.

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[33] *Ensuring a successful UK research endeavour, A Review of the Research Councils by Paul Nurse* (November 2015): https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/478125/BIS-15-625-ensuring-a-successful-UK-research-endeavour.pdf

[34] With the exception of other Government Departments' own R&D spend – e.g. MOD and DH.

Common research fund

7.22   Paul Nurse proposes that the Government should establish a 'common research fund', which would support multi- and inter-disciplinary research; research to address cross-cutting societal needs; and scientific developments which open up new opportunities. If this fund is to be created, we would propose the following principles are taken into account:

(a)   As with all Research Council funding, excellence must be the primary criteria for granting funding and funds must be allocated based on peer review, with reviewers pooled from across the Research Councils and critical mass should also be taken into account as far as possible

(b)   It should operate in **responsive mode**, allowing the community to indicate which areas of research are in need of support. Open calls would allow researchers to submit proposals at any time, with regular evaluation throughout the year to ensure the fund is agile and responsive

(c)   This fund should not be seen as a 'second chance' for applications to the Research Councils which are unsuccessful due to quality, nor should it be seen by Research Councils as a reason to become more narrowly focused within their disciplines and reduce other support for interdisciplinary work

(d)   The amount allocated for this fund should not initially be set too high: a pilot or trial period would be advisable to test the functioning of the fund before a larger-scale roll-out is implemented or before any decisions are made on the need for a larger fund.

The Research Excellence Framework (REF)

7.23   The REF is a fundamental part of the UK's dual support system for research funding. Whilst there is scope to improve the REF for the future, and we would welcome a lighter touch approach, it should be recognised that the RAE/REF has succeeded in driving up the quality of research in the UK by supporting a research culture focused on excellence. The REF ensures that QR allocations are based on the quality of research, the research environment and the impact of excellent research; but, in addition, the exercise allows universities to benchmark against each other and provides an indicator of research reputation across the UK. In turn, this helps businesses and international partners, for example, to identify excellence in different areas in UK universities and supports efforts to drive business–university collaboration and inward investment.

7.24   As a mechanism to underpin the distribution of QR funding, the REF is also a relatively cost-effective exercise, although we would like to see the costs reduced as much as possible. As noted in the Green Paper, the cost of REF is estimated to be roughly 2.4% of the £10.2 billion in QR research funds to be distributed between 2015-16 and 2020-21.[35] This cost per pound of research funding could be reduced further by extending the period between REF exercises.

7.25   It is essential the REF methodology is based upon the latest thinking about research assessment, utilises peer review, is sufficiently granular to enable the distribution of QR funding, and continues to have the confidence of the higher education sector and other stakeholders, in all countries of the UK and internationally.

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[35] *REF accountability review: costs, benefit and burden*. Technopolis for HEFCE (July 2015) http://www.hefce.ac.uk/pubs/rereports/Year/2015/refreviewcosts/Title,104406,en.html

7.26 The **REF should recognise and reward the very highest levels of excellence in research**, and should avoid driving a growth in lower quality research. The REF should also recognise the importance of higher concentrations of research excellence, critical mass and multi-disciplinarity. High concentrations of research excellence across disciplines are a foundation for innovative, interdisciplinary research collaborations that are key to solving global challenges.

Metrics

7.27 The Green Paper mentions the desire to "champion better and more effective use of metrics" and making greater use of metrics to 'refresh' the REF results in between full peer review.

7.28 Whilst metrics may be seen at first sight as a quicker and cheaper alternative to peer review, it is essential to be aware of the many shortcomings in their use. These shortcomings arise in a number of areas, for example: in relation to equality and diversity issues; differences between and even within different disciplines that metrics would struggle to capture; and the ability to 'game' the data (in particular as metrics being used in REF will be known in advance). Importantly, **metrics lack the element of judgement that is at the heart of the long-established peer review process** – this was the conclusion of the independent review on metrics last year:

> Even if technical problems of coverage and bias can be overcome, no set of numbers, however broad, is likely to be able to capture the multifaceted and nuanced judgements on the quality of research outputs that the REF process currently provides.[36]

7.29 In considering the use of metrics in the next REF it is important to tackle each element of the REF exercise separately (assuming the current structure is broadly maintained), rather than to approach the whole exercise as a single entity. With regard to outputs, we do not see a strong argument for extending the use of metrics beyond what was permitted within REF 2014. In particular, there remain real concerns around their use for some social sciences and for arts and humanities disciplines. The element of judgement that **peer review** enables is essential when evaluating a diverse range of outputs across the research spectrum – and even more so when considering the quality of interdisciplinary research. As such, we would propose that sub-panels should be able to decide whether they would find it useful to have bibliometric data made available to them. We would recommend that any metric data supplied to sub-panels must only be used to <u>inform</u> peer review as in REF 2014.

7.30 At this stage, there is no convincing evidence that there should be any role for metrics to be used to assess impact; peer review must remain the primary method of assessment here. Again, the diversity of impacts delivered as a result of excellent research makes comparisons and judgements very difficult unless by peer review. However, data provided within the impact case studies could be more standardised in places to help facilitate comparison and analysis of the case studies.

7.31 However, **metrics could be used much more extensively and successfully in the environment section of REF**. Indeed, this whole section could be simplified radically and increased use of metrics could help. Moving more towards metrics here would build on a tested precedent as some quantitative data is already used for the assessment of the research environment, such as the number of PGR students, external research income and research income in-kind.

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[36] 'The Metric Tide', Report of the independent review on the role of metrics in research assessment and management (July 2015)

7.32 The Government should consider the implications of trying to refresh REF results with metrics in between peer reviewed exercises carefully in order not to create perverse incentives in the system and not to undermine the validity and credibility of the peer review exercises.

Reducing burden in the REF

7.33 Whilst there is certainly scope to improve the REF and reduce the burden of the exercise, it should be noted that a large part of the cost and burden of REF 2014 was due to the novelty of including impact assessment as a new dimension. By maintaining the broad structure of the REF and broadly similar rules, universities will be able to draw on their experience of REF 2014 and learn from the previous exercise in order to prepare submissions more efficiently. Major changes to the exercise will require universities to invest additional time and effort in understanding new structures, processes and rules.

7.34 The Green Paper notes that there will be a peer reviewed REF by 2021. However, we would suggest the Government considers delaying the next REF to at least 2022. By reducing the frequency of the REF, it will save time and money both for HEFCE (or any future body running the REF) and for institutions. A further way to reduce the burden of the REF would be to have an overarching environment submission covering the whole institution.

7.35 We look forward to engaging with Lord Stern's Review of the REF over the coming months, in particular looking at ways to reduce the burden of the REF without diluting its rigour and international reputation.

January 2016