



Department for Business, Innovation & Skills

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

You can reply to this consultation online at:

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

A copy of this response form is available at:

<https://www.gov.uk/government/consultations/higher-education-teaching-excellence-social-mobility-and-student-choice>

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)

The Association of School and College Leaders (ASCL) represents more than 18,000 heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of maintained and independent schools and colleges throughout the UK. ASCL has members in more than 90 per cent of secondary schools and colleges of all types, responsible for the education of more than four million young people. This places the association in a unique position to consider this issue from the viewpoint of the leaders of secondary schools and of colleges.

ASCL represents the majority of HE applicants' schools and colleges and almost all of the widening participation cohort. We have therefore interest in, expertise in and

particular knowledge of educational standards, student futures, social mobility, equity and advice and guidance as it currently exists in this country.

Public sector equality duty

Question 1:

- a) What are your views on the potential equality impacts of the proposals and other plans in this consultation?

All of the stated elements and objectives are clearly intended to promote equality and improve on the current situation.

On-going evaluation of reform, action, applicant response and educational outcomes will need to be a fundamental part of the approach in this area. This includes areas such as the development of the living loan and the potential impact of differential tuition fees by institution and course.

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

Yes No Not sure

Please provide any further relevant evidence.

Probably complete, although some secondary impacts or knock on effects remain a concern.

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

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

Improvement of this aspect of the student experience is a priority. Those of our students who drop out of Higher Education mainly cite poor information about courses or lack of contact time as the reasons.

Currently the NSS data is vital to inform applicants in how they identify which courses best suit their learning styles, how they choose their courses and, after receiving offers, how they moderate the relative merits of these courses. Access to and interpretation of this data is difficult without expert advice, which is not widely enough available, particularly to the most disadvantaged applicants.

There is a fundamental difference between teaching and learning in schools and that in Higher Education where independent learning is both an assumption and an outcome. The level of independence expected is different for different mission groups of institutions and cohorts of students and may be inverse to the didactic teaching or support provided in others.

The metrics of the TEF will need to be able to reflect this and to recognise excellence in several guises. Our experience of mechanistic attempts to recognise teaching quality in our own sector would urge caution. Learning is a wider part of the student experience than teaching as such and further work on quantifying this is needed.

There is a particular concern over the use of this data by employers. Crude measures of courses and institutions do not translate well to individual students. Whilst details of the student's experience and disaggregated attainment may be informative we are concerned about potential misapplication of crude course teaching scores. However, where employers might be involved in sponsoring students it is entirely appropriate that they should be fully informed of all aspects of provision.

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

Yes No Not sure

Please give reasons for your answers.

Credible metrics would be a vital aspect of student decision making and all eligible courses will therefore want to be included. Any segregation will lead to devaluing either the metrics or the institutions.

Metrics need to be transparent to applicants without the need for expert advice to improve social justice in access to advice and guidance.

Part-time and vocational delivery is currently excluded from funding and following sustained funding cuts is now greatly reduced from what it was even a few years ago. Inclusion in the data would enable a recovery in a sector vital to UK industry and life-long learning.

Recent experience in the school sector prompts caution in assuming new providers will necessarily deliver anything of quality. Applicants with access to good advice would be unlikely to invest their future careers and financial liabilities in an unknown entity without TEF information. However new providers who are, or are acting on behalf of vocational or professional bodies would in principle be a most welcome addition to the HE landscape and would, on the basis of experience with the path-finding work of the accountancy profession be likely to do well in the TEF assessment.

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

Providers charging higher fees and therefore initially being funded from the public purse should follow the Access Agreement model. This has done much to improve provision in established HE and it is essential it is built in to new provision from the outset to avoid establishing additional inequality. The proposal that TEF should report on disadvantaged groups will support this and contextualise outcomes.

Where a vocational provider focusses on a particular career area the destination and earning data would be of particular interest to applicants, as it currently is at course level with UNISTATS.

It is not a clear part of this question but the point in paragraph 21 about additional fees raises the issue of different fees for different courses and hence varying levels of deterrence to debt-averse families and applicants. This would be of significant concern in state schools and colleges.

Question 5: Do you agree with the proposals on:

a) what would constitute a 'successful' QA review

Yes No Not sure

b) the incentives that should be open to alternative providers for the first year of the TEF

Yes No Not sure

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

Yes No Not sure

Please give reasons for your answer.

Alternative providers should meet the full range of obligations required of current HE. Higher level vocational pathways should be developed and FE encouraged and supported to prepare students for them. QA in its current form is only one of the standards HEPs need to meet, and to expect the TEF to do so much more may be over-optimistic. Opening up public funding and graduate debt to the private sector may lead to abuse.

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

Yes No Not sure

Assessment panels?

Yes No Not sure

and process?

Yes No Not sure

Please give reasons for your answer.

Timing depends on the changes necessary to achieve the improvements required by the HEFCE consultation.

Degree inflation is identified as a reputational threat to the sector in the introductory section of the paper. It is important to minimise incentives to distort student outcomes any further and to police standards far more effectively. It is already the case that employers use A level results to differentiate graduates to the detriment of social mobility, as they are concerned by the expansion of high-grade degree results. A GPA approach alone is unlikely to change the inflation problem.

This information needs to be at subject level.

Question 7: How can we minimise any administrative burdens on institutions? Please provide any evidence relating to the potential administrative costs and benefits to institutions of the proposals set out in this document.

Not our area of expertise. In principle data already being generated should be used as far as is valuable.

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

Yes No Not sure

Please give reasons for your answer.

In principle. Again this would be best at subject level.

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

Yes No Not sure

Please give reasons for your answer.

Alternative providers should be rewarded for their high quality delivery and contribution to social mobility. The approach does need to recognise their focus (for example, skills) and impacts on data of focus on professional training, discipline etc.

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

Yes No Not sure

Please give reasons for your answer.

Student contact time is a key factor in the student experience but it needs to be of high quality and measured at student level. Spending time in a room with an untrained assistant is as misleading in the data as recording one excellent lecture. Learner experience varies by course and so aggregation would be skewed by subject mix in an institution – as will research citing, destinations, earnings etc. This needs to be avoided. On the other hand aspects of the experience (and even learning) may take place outside the student's own department and these too should be recognised by a holistic appraisal at learner level.

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

Yes No Not sure

Please give reasons for your answer.

The data needs to enable drill-down by subject but also by student sub-group so that it does not work against widening participation.

Teaching intensity as proposed may threaten the valuable student exposure to active researchers.

There is a concern that learning gain would be an additional driver to inflation.

Time alone is not a fair measure where quality varies.

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

Question 12:

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

Yes No Not sure

Please give reasons for your answer.

Improvement would be very welcome. Considerable positive progress has been achieved by OFFA in this area. Whilst widening participation in admissions is only a start in the process and the division is potentially unhelpful, the single focus of the regulator has ensured progress. UUK's report proposed merging into a single body but clearly did not have fair admissions as a priority. ASCL is concerned at the potential loss of priority given to access.

- b) Do you agree that the Office for Students should have the power to set targets where providers are failing to make progress?

Yes No Not sure

Please give reasons for your answer.

Further details of the link between target setting and Access Agreements would be helpful. Clearly there would be an appeals process and this too is unclear.

There are concerns over low attainment pre-HE limiting intake to high tariff HEPs. This is likely to be negatively impacted by the loss of AS, increasing reliance on GCSE in admissions, and funding cuts to FE where many of these applicants study.

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

Improving the availability and validity of the grouping and the information available to contextualise applicants are essential.

Question 13:

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

More accurate identification of disadvantaged students. Recognising progress in widening participation by institutions. This would in turn enable recognition of later social mobility and barriers.

Improved targeting of resources for outreach and student support. This should include networking between regional SPOC collaborations.

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

Additional costs are not known to ASCL. Might there be a loss of income to UCAS?

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

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

- Yes No Not sure

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

Innovation at public expense is not necessarily a route to excellence.

Proliferation of new universities risks driving degree inflation further and the demise of any equivalence between degrees from different UK universities.

Question 15:

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

Yes No Not sure

Please give reasons for your answer.

The approach seems sound, but this is not our area of expertise.

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

Our priority is the quality of provision. It is unclear that this change will do anything to improve provision and may weaken quality at the expense of freedom to providers.

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

Yes No Not sure

Please give reasons for your answer.

Given the demographic dip, modelling demand and capacity might be more important than short-cutting the establishment of new HEPs.

Guaranteeing student protection is a key point for us.

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

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

Yes No Not sure

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

This is essential. Schools and colleges could not otherwise advise students to enrol at such providers. The proposals seem to cover the areas necessary.

Simplifying the higher education architecture (Part C)

Question 18:

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

Yes No Not sure

Please give reasons for your answer.

Elements of this seem to risk the following:

- Considerable positive progress has been achieved by OFFA. Whilst widening participation in admissions is only a start in the process and the division at the point of entry is potentially unhelpful the single focus of the regulator has ensured progress. It is clear that UUK's report which proposed merging into a single body did not have fair admissions as a priority. We are concerned at the potential loss of priority given to access.
- The OfS may also struggle to achieve policy objectives and represent the interests of students where these diverge from institutions' shared objectives with the OfS.
- Short term financial instability.
- Loss of independence from direct central political control.

Clear and simple approaches are often wrong, especially in the longer term.

b) To what extent should the Office for Students (OfS) have the power to contract out its functions to separate bodies?

Fully Partially Not at all

c) If you agree, which functions should the OfS be able to contract out?

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

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

Agree Disagree Not sure

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

Agree Disagree Not sure

Please give reasons for your answer,

Less direct political control and better linking to performance factors.

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

Yes No Not sure

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

Without a single regulatory framework it would in practice be impossible to make fair comparisons between institutions. Clearly transparency and lightness of touch are to be preferred provided that the system can still perform its necessary functions.

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

This is a very strange question to be included here and appears to come from a different agenda. It implies problems for which there has been no evidence presented.

Question 21:

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

Yes No Not sure

Please give reasons for your answer.

Although ASCL would agree with much of this, we are not convinced of the priority widening participation and fair admissions will have. How the OfS will represent students' interests is also unclear.

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

Yes No not sure

Please give reasons for your answer.

Question 22:

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

Yes No not sure

Please give reasons for your answer.

These broad principles seem very sensible.

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

This is not a question for ASCL to answer. We are confident providers will respond about this.

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

Yes No not sure

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

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?

This is not a question for ASCL to answer.

Question 25:

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

This is not a question for ASCL to answer.

b) Would you favour a degree of hypothecation to ensure that dual funding streams, along with their distinctive characteristics, could not be changed by that organisation?

Yes No not sure

Please give reasons for your answer

This is not a question for ASCL to answer.

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?

This is not a question for ASCL to answer.

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

This is not a question for ASCL to answer.

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

This is not a question for ASCL to answer.

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

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

No further comment.

Thank you for your views on this consultation.

Thank you for taking the time to let us have your views. We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would it be okay if we were to contact you again from time to time either for research or to send through consultation documents?

Yes

No

BIS/15/623/RF