

million+ response to Business, Innovation and Skills Select Committee Inquiry on assessing quality in higher education October 2015

Introduction

1. million+ is a university think-tank working with modern universities which engage in high quality teaching, excellent research, knowledge exchange and innovation. In September 2015, million+ published *Quality assurance in England: Key Principles*¹, in response to the Higher Education Funding Council for England's consultation on a new system for quality assessment. In October 2015, million+ published *The possibilities and pitfalls of a Teaching Excellence Framework*² which considered the issues posed by the government's proposal to introduce a teaching excellence framework linked with fees for higher education providers in England.
2. Both of these publications address the questions posed by the Committee for this inquiry. This submission focuses on the key points highlighted by the Committee in its terms of reference.

Quality assessment in higher education

3. There is widespread sector agreement that the current quality assurance system would benefit from some reform, particularly to consider a more proportionate, risk-based approach to higher education reviews that acknowledge and respect the experience of mature providers. It is also necessary to consider appropriate quality criteria for new institutions hoping to enter the higher education market.
4. In its consultation, the Higher Education Funding Council for England (HEFCE)³ proposed that the current quality assurance system should be overhauled and replaced by a system primarily administered by HEFCE with internal assessments undertaken by university governing bodies.
5. In addition, HEFCE proposed that the system of external examiners should be standardised with mandated training and a national register. While there may be merit in the provision of further training courses, the external examiner system is based on a long-standing tradition of autonomy, covers a wide-range of courses and disciplines and is UK-wide. The proposal to create a national register risks transforming the external examiner system into a regulatory function of HEFCE. This would undermine academic integrity and institutional autonomy and create additional and unnecessary bureaucracy.

¹ <http://www.millionplus.ac.uk/research-policy/reports/latest-reports/quality-assurance-in-england-key-principles>

² <http://www.millionplus.ac.uk/research-policy/reports/latest-reports/the-possibilities-and-pitfalls-of-a-teaching-excellence-framework>

³ The proposals are the consequences of a shared review of quality assurance by HEFCE, the Higher Education Funding Council for Wales and the Department for Employment and Learning in Northern Ireland. Throughout this document, references to HEFCE should be taken to mean all three funding bodies.

6. HEFCE's proposals for quality assurance transfer responsibilities to governors that are not compatible with their roles. In general, university governors are recruited for the insights and the networks that they bring from outside of the higher education sector. They are unlikely to be qualified and are not appointed to express and reach judgments about academic quality. As with other governing bodies in similar organisations, the role of governors is a strategic rather than an operational one. As such governors rely on internal and external advice – and one of the providers of external advice has been and should be a national, independent quality assurance organisation and system. If this function was provided in a fragmented way, or via different consultancy organisations, governors in different institutions are likely to receive advice of differing quality. In addition, external scrutiny and the ability to share effective practice across the sector and between institutions would be reduced.
7. Independent, external quality review and scrutiny of universities that is separate and distinct from the funding of higher education is a long-held tradition of the UK higher education system. It has underpinned a UK-wide approach to quality assurance. While in Scotland an enhancement agenda (which has much to commend it) has been developed as part of the quality assurance system, HEFCE's approach would effectively end a UK-wide approach to quality assurance and the current potential for cross-border collaboration.
8. While there is scope for reform to ensure a proportionate, risk-based and appropriate review of institutions with strong track records, the credibility provided by independent external quality assurance has been one of the hallmarks of UK higher education and in this case, English universities. It has lasted because it is effective and does much to uphold the reputation of universities and of the sector, both within the UK and overseas. There is no evidence to suggest that HEFCE's proposals would improve the quality of higher education.

The Teaching Excellence Framework

9. Interest in high quality teaching in universities is not new. Successive governments have made commitments to improve and reward teaching excellence in a quest to ensure that students benefit from the high quality teaching that they deserve⁴. This interest has been pursued within the different strategic and political priorities of the government of the day. Most recently the current UK government was elected with a manifesto commitment to introduce a Teaching Excellence Framework (TEF) for universities in England. Subsequently the Chancellor of the Exchequer linked teaching quality with individual institutional 'permissions' to increase tuition fees by inflation⁵ – a proposition that had not been the subject of prior consultation with universities or students. The TEF - and especially the link with fees - have important and wide-ranging implications for students, universities and the UK's international standing in the higher education market.
10. All students should benefit from high quality, excellent teaching at whichever higher education institution they opt to attend. Ministers are right to suggest that those universities which admit and educate students from a wide range of backgrounds and who enter university at different

⁴ From 2005-10 the then Labour government provided in excess of £300m additional investment to support the CETL programme (Centres of Excellence in Teaching and Learning)

⁵ In his Summer Budget speech the Chancellor of the Exchequer said "we'll link the student fee cap to inflation for those institutions that can show they offer high-quality teaching" 8 July 2015

<https://www.gov.uk/government/speeches/chancellor-george-osbornes-summer-budget-2015-speech>

ages with varied pre-entry qualifications have not been given due recognition for the quality of their teaching or their achievements in supporting.

11. Nonetheless, there are real and distinct differences between initiatives which enhance teaching quality and develop and promote best practice and standards (which million+ supports) and a TEF that seeks to measure and assess teaching quality on a sector-wide or subject basis.
12. There is no agreed definition of teaching excellence and certainly not one that can be applied easily to an assessment and metric-based approach to measuring teaching quality. This is not unique to the UK. Internationally, agreement about the definitions of teaching excellence are as hard to find as the Holy Grail.
13. For modern universities in particular interest in high quality teaching through the delivery of an innovative array of teaching and learning activities has not depended on government interest. As such teaching and learning do not stand apart from the research and scholarship that are integral to both a university as an institution and to the delivery of a university education.
14. Teaching and learning are complex, multi-faceted and dynamic and linked with a wide-range of different qualifications and study routes. As in the rest of the UK, teaching in English universities covers the full-range of subjects and applied disciplines. Unlike a national or school curriculum geared to attainment in nationally regulated and recognised subjects and courses, universities have a record of developing and accrediting degree programmes linked with new and innovative areas of study to meet economic, environmental and societal challenges.
15. Subjects can be taught and studied as single honours degrees or in a combination with other subjects as joint or specialist honours including through modular programmes. International students study alongside their home and EU counterparts. Full-time and part-time modes of study may be offered as well as lower-level higher education qualifications. Working in partnership with professional bodies and employers, universities offer courses linked to a wide-range of professions with some programmes specific to a certain industry or service.
16. Many professional courses are taught at postgraduate level and are designed to meet statutory and regulatory standards and confer a licence to practice. Some degree programmes are sandwich courses. Others require extensive periods on work placements with assessment associated with the latter while some are work-based.
17. Approaches to teaching and learning have been adjusted so that students are more actively engaged as co-partners in the development of their university's approach to learning. Student-centred teaching and e-learning have been integrated into programmes. Action-learning sets, problem-based learning, role-play and role-play scenarios, simulations and simulated work environments are just some of the teaching and learning methodologies which have been incorporated into course delivery. Teaching, learning and assessment – at least in modern universities - have increasingly been linked to graduate employability. Students are encouraged and supported, not only to develop the intellectual capabilities and skills required for the world of work, but also to develop the social dispositions which underpin civic engagement and community involvement.
18. In this rich and varied environment of teaching and learning, the commitment to develop a Teaching Excellence Framework (TEF) is challenging. Overlaying the TEF on the complex and innovative array of teaching and learning activities which take place in universities *and* linking outcomes with institutional inflationary fee increases is fraught with problems.

19. Nor is it easy to agree how the characteristics associated with high quality teaching can be reliably compared both within, and between, highly complex organisations whose institutional autonomy has enabled them to offer varied teaching and learning environments, methods of assessment and course programmes. This is not to absolve universities of responsibility for high quality teaching - exactly the opposite. However, responsibility to improve practice and enhance performance is entirely different from a comparative metric-based assessment of teaching quality. Such an assessment runs the risk of being administratively burdensome and, at the present time, could only be based on data measures designed for other purposes and which have their own flaws and shortcomings. While some UK surveys⁶ of students have confirmed that there are variations in student opinion, for example in relation to contact hours, evidence from the international market continues to suggest that UK universities are highly regarded for both the quality of their teaching as well as the quality of their research. In fact there are good academic reasons why simplistic measures like contact hours may vary. The delivery of teaching, learning and assessment are complex and cover a wide range of courses, scenarios and university missions.
20. There are also distinct differences between the attitudes of students in Scotland compared to those in England when questions about value for money are raised⁷. Unlike their peers in England, Scottish students who study full-time do not have to pay tuition fees. While in principle higher education is free at the point of access south of the border for first-time undergraduates, 90% of English full-time students take out a tuition fee loan and a maintenance loan to fund their higher education. Differences in funding regimes - rather than differences in the quality of teaching – are likely to be the primary reason why students in England are much less satisfied that their universities are providing value for money than their Scottish counterparts.
21. Students and parents may well be justified in wanting improvements in the delivery of teaching on some courses in some universities and short-comings need to be addressed. However, any suggestion that a metric-driven Teaching Excellence Framework could be an accurate and reliable signpost for high quality teaching per se, runs the risk of seriously misleading 'consumers'. Moreover, current data sets are an inadequate basis on which to develop a TEF with potential implications for the unit of resource.

The limitations of data and metrics

22. The much quoted National Student Survey (NSS) is at best a pen picture but it does highlight issues that universities then seek to address. However, many variables are at play. English universities are remarkable in the diversity of their student profiles and for example, campus-based universities frequently score more highly in overall NSS student satisfaction rates than others. This may be the result of high quality teaching and the delivery of an excellent student experience or it may in whole or in part, be a reflection of the more socially exclusive profiles of the student bodies of these universities and the environment in which their studies take place.
23. There have been suggestions that the TEF should include a measure of 'learning gain'. Many modern universities have long argued that there should be greater recognition of their achievements in supporting students on varied educational journeys. However, assessing learning gain is not as straightforward as sometimes implied. Universities accept different pre-

⁶ *Student experience survey* pub Hepi-HEA 2015 <http://www.hepi.ac.uk/2015/06/04/2015-academic-experience-survey/>

⁷ *Ibid* Hepi-HEA

entry qualifications. Descriptions of institutions in tariff terms are misleading. Some universities have excelled in accepting students on the basis of accrediting prior learning (rather than just pre-entry qualifications) while the Open University has no entry requirements at all. Part-time students take longer to complete. Mature students often balance work-life and study commitments and for some of these students, the award of a degree may be a major achievement in itself even though it may not be an honours degree.

24. The Destination of Leavers in Higher Education (DLHE) surveys are questionable as TEF 'measures'. Based on surveys of students at 6 months and three and a half years after graduation, they have well-recognised limitations. The surveys rely on graduates self-reporting earnings with varied response rates. Little account is taken of the different employment and earning trajectories associated with different careers and the portfolio careers typical of some of the creative industries are completely ignored.
25. The definitions of graduate jobs and in particular, 'non-professional' jobs have not kept pace with employer requirements. The qualitative data behind the DLHE surveys are currently under review by the Higher Education Statistics Agency. Part-time graduates may already be in work or in the alternative, be hoping to begin new careers. The 'DLHEs' as well as other measures of earnings and employment outcomes do not take account of the advantages accrued through cultural capital and family background.
26. It is also well-evidenced that students from black, minority and ethnic backgrounds do not achieve the same degree outcomes as their white peers once all of the variables have been taken into account. In this respect, BIS Ministers and the Office of Fair Access are right to target the importance of universities renewing their efforts to seek to ensure equity of attainment. However, it is not clear that this important work will be enhanced by a Teaching Excellence Framework linked with fees.

Institutional behaviours and the TEF

27. There is the potential for legal challenges to the TEF from students, parents and institutions in a market in which the Competition and Markets Authority increasingly has a say and for institutional 'game-playing'. Universities can close courses which perform less well in NSS scores. In the Research Excellence Framework, universities make careful calculations about which staff to enter. Such behaviour is completely rational and may well align with institutional interests. However, there is no reason to suppose that an assessment-based TEF linked with fee increases would be immune from similar considerations. BIS 'guess estimates' that the TEF might be worth a 3% uplift in the fee cap by 2017, seem far-fetched given current RPI rates. But if there is 'skin in the game' in terms of funding, universities like other organisations can be expected to consider how to get the best outcomes. This may - or may not - be the same as improving the quality of teaching.

The TEF and independent quality assurance

28. We agree with the Committee that the TEF cannot be divorced from the quality assurance system. Since 1997, an independent quality assurance system has underpinned the reputation of UK universities in the domestic and international markets. This quality assurance system should not be compromised by the TEF. Any suggestion that institutions successful in the quality assurance regime may be judged as 'falling short' in the TEF or in the alternative, are not judged as having achieved some TEF 'gold standard' would be highly damaging. It would undermine the reputation of universities within the UK and in the international higher education market and it would risk undermining the quality assurance process itself.

Investment, fees, quality assurance and international reputation

29. There remains a strong case for the government to increase direct investment in English universities. In England fees derived from student borrowing from the Student Loan Company now have to be used by institutions, not only to invest in teaching but also to underpin capital investment and a host of other areas where direct government funding has been withdrawn. For their part, students are entitled to expect high quality teaching whatever and wherever they study and at whatever age they enter university. It is potentially counter-intuitive to propose that students should pay more fees for high quality teaching to which they might reasonably think that they should already be entitled.
30. However, if no direct investment is forthcoming – or if the November 2015 Spending Review undermines the unit of resource and cuts further into what remains of direct grant - there is every reason why there should be an uplift in the fee cap in 2017 to meet the increased costs of provision regardless of any TEF and provided that universities have been successful in quality assurance. By 2017, fees will have been frozen for 5 years with direct investment substantially reduced during the period. An inflationary uplift in the fee cap is required to meet the costs of the high quality teaching that students have a right to expect in all universities – not as a ‘reward’ assigned to a few.
- BIS and the Treasury should accept that if universities have been successful in the quality assurance regime they should be able to lift fees by inflation in 2017.

International reputation

31. An Ofsted-style teaching excellence framework with bronze, silver and gold ratings linked with further fee variability, risks creating new administrative and bureaucratic burdens and would not be a sound or robust basis on which to create greater competition in the market. Such a framework has the potential to reduce risk-taking and innovation in teaching, learning and assessment but it also risks undermining the UK's global reputation for high quality higher education – a reputation that has been hard-won and well-earned.

Conclusion

32. There are good reasons to moderate the proposal to link the TEF with fees. BIS should continue to work with HEFCE, HEA, QAA and universities to consider how high quality teaching in English universities can be further promoted and enhanced. Models of best practice and different institutional strategies should be identified, evaluated and disseminated. There is also a strong case to continue to examine the data sets and other evidence that might help to better understand the different environments and drivers which support high quality teaching.
33. Ministers want to promote high quality teaching, social mobility and open up new opportunities to those from communities who have not previously benefitted from access to a university education. million+ welcomes and supports this agenda but we remain concerned that a complex, metric-driven TEF linked with fees would have unintended consequences that would damage the UK's international reputation for high quality teaching and research. Such an approach could also hinder, rather than enhance, innovation and the dissemination of best practice in high quality teaching throughout the sector.

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