

Response ID ANON-CUT2-WQVE-1

Submitted to **Fulfilling our Potential: Teaching Excellence, Social Mobility and Student Choice**

Submitted on 2016-01-14 12:14:15

Introduction

What is your name?

Name:

Paula Graham-Gazzard

What is your email address?

Email:

paula.graham@thead.ac.uk

What is your organisation?

Organisation:

Council for Higher Education in Art & Design (CHEAD)

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

Please tick the category that applies:

Representative Body

Public Sector Equality Duty

1a What are your views on the potential equality impacts of the proposals and other plans in this consultation?

Please type your answer in the answer box:

The emphasis on widening participation is extremely welcome. However, proposals to improve social mobility through the Teaching Excellence Framework should take account of the existing access agreements. There is nothing to indicate that a complex, metrics-based information base will be any more intelligible to potential students with protected characteristics and may, indeed, be less so.

1b Are there any equality impacts that we have not considered? Please provide any further relevant evidence.

Yes

Please type answer in text box:

Institutions most likely to exit may also have a disproportionate number of students with protected characteristics. There should be provision for appropriate support to students from disadvantaged backgrounds in the event of provider exit.

CHEAD's membership may comment individually.

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

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.

Please type your answer in the text box:

The Art & Design sector has been at the forefront of innovation in working with employers to ensure that A & D teaching and learning in HE maximises employability and ensures that our world-class creative industries continue to thrive. Many of our members have employability rates well above 90% and we very much welcome widening concepts of teaching excellence beyond individual staff performance by setting teaching and learning within the wider context of the UK economy.

We are, however, concerned that the way in which employment statistics may be used in TEF's technical implementation may provide students and employers with misleading information as to the skills, capacities and employability of graduates in Art & Design. This is because of relative earnings and job security in different economic sectors which could 'skew' perceptions of the employability of graduates in the Art & Design sector in which relatively low pay at graduate and early career levels is characteristic. The nature of employment patterns in the creative industries will lead to significant difficulty in gathering reliable employment statistics on the 'portfolio' and freelance careers which are characteristic of this sector.

This may particularly impact students from disadvantaged backgrounds who may be less able to interpret information derived from TEF. Employers may struggle to compare the quality of graduates from HEIs in different sectors accurately. This could unfairly disadvantage smaller and more specialist institutions and their graduates.

Furthermore, there is a well-documented employer bias towards students from elite social and educational backgrounds which does not take into account any value added by teaching and learning [Non-educational barriers to the elite professions evaluation, Social Mobility and Child Poverty Commission, 14 June 2015;

Lauren A. Rivera, Pedigree: How Elite Students Get Elite Jobs, 2015, Princeton UP].

It is important, therefore, that frameworks are developed for employers to work with HEIs to ensure that graduates are appropriately skilled for their target industry sector and for employers to gain a better understanding of the crucial importance of diversity in the workplace for innovation in industry [Fostering Innovation Through a Diverse Workforce | Forbes Insights, 2014].

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? Please give reasons for your answer.

Yes

Please type your answer in the text box:

We broadly support this aim but with some reservations based on the technical approach to developing metrics. If the approach to measuring 'excellence' is not modelled appropriately for the Art & Design sector this could prove problematic for the whole A & D HE sector and related industries as discussed in the response to [Q. 10] below. BIS rightly starts from the principle that "excellence must incorporate and reflect the diversity of the sector, disciplines and missions"; it is crucial that TEF reflects this principle by reflecting the practices of individual sectors such as Art & Design.

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?

Please type answer in text box:

We would support the use of Access Agreements for all types of HEI and if new models are required CHEAD members feel strongly that processes for widening participation should be standardised across all types of HEI. The burden for widening participation should not fall solely on established HEI providers. As Access Agreements provide a narrative of institutional efforts around widening participation, there is potentially information in the Access Agreement that can be used in the TEF assessment process at TEF Level 2 or beyond. If done right (e.g. through the OFFA role as incorporated into the new Office for Students), this would help reduce the reporting burden and duplication.

5a Do you agree with the proposals on what would constitute a 'successful' quality assessment (QA) review?

Not sure

5b Do you agree with proposals on the incentives that should be open to alternative providers for the first year of the TEF?

Yes

5c Do you agree with the proposal to move to differentiated levels of TEF from year two?

Yes, Not sure

Please give reasons for your answers to question 5

Please type your response in the text box:

The parameters are not clear. Our individual members may reply to this question in more detail.

6a Do you agree with the proposed approach to timing of TEF assessments?

Not Sure

6b Do you agree with the proposed approach to TEF assessments panels?

Not sure

6c Do you agree with the proposed approach to TEF assessment process?

Not sure

Please give reasons for your answers to question 6

Please type your response in the text box:

Given the scope of the revision we feel that the schedule is tight. There will be only one year to define, develop and implement the technical frameworks for TEF's second stage. The proposals are complex and far-reaching. CHEAD would welcome the opportunity to engage positively with the development of appropriate technical implementation for the A & D Sector.

We would welcome more clarity about processes to ensure that metrics adopted for Art & Design HEIs and/or subject areas are appropriate to the information needs of both students and employers for the creative sector.

We are also concerned that DHLE statistics may be used as an interim device pending NSO review of graduate employment data and that these cannot represent the success of arts graduates in the A & D HE sector accurately.

The proposal to move towards a more narrative-driven process beyond level TEF level 1 may help ensure teaching excellence is understood in terms of more

than just narrow metrics. But the danger remains that the metrics will still be relied on too heavily. We urge caution around the use of metrics and encourage BIS to further explore the options in the forthcoming TEF Technical Consultation.

With regard to assessment panel composition - it seems reasonable to draw on academic expertise as well as students and employers; all have a vital interest in HE teaching. But it is vital to strike the right balance. Two principles may help here: (a) the academic experts should not be outweighed on the panel, (b) that the panel's experts are drawn from across the sector and are capable of understanding diversity of institutional contexts and subject-areas.

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.

Please type your response in the text box:

Our members may respond individually on this question.

8 Do you agree with the proposed approach to differentiation and award as TEF develops over time? Please give reasons for your answer.

Not sure

Please type your response in the text box:

It is not clear exactly how incentives to participate in TEF will work in practice, unless fees are to be increased in real terms the differentiation may not be sufficiently attractive to offset the cost of participation in the A & D sector where recruitment is generally high unless there is a mechanism to allow A & D HEIs to offset the high cost of their courses in a way which does not overburden graduates in a sector where employability is high but remuneration relatively low. Moreover, differentiated fees is not an effective method of driving up investment in teaching and learning. Neither previous fee-rise (2006 or 2012) created a market in fees, because all providers eventually sought to maximise their income in order to invest in the student experience. Linking fee-caps to TEF levels increases the chances that some providers will not have that opportunity.

This is a particular issue for high-cost subject-areas like Art & Design, where costs frequently already exceed the fee cap. Perversely it also makes it harder to achieve the policy intent of raising quality across all providers.

If evaluation methodologies will be specific to subject areas or programmes and these scores aggregated at institutional level then students may pay more for an averagely rated course at a highly rated institution and vice-versa. This would be economically unfair to students, disadvantage excellent performance at course level if the overall HEIs rating failed to match, and be confusing to employers in understanding which students are likely to have benefitted most from which courses.

BIS may wish to consider whether the proposed four TEF levels is too many. The more levels TEF has, the more bureaucratic and costly the exercise becomes. It will incentivise institutions to spend more on managing the process rather than investing in teaching and learning.

If TEF does evolve to multiple levels, its design must be based around thresholds of excellence, rather than merely ranking institutions. It should in theory be possible for all institutions to be at the highest level of TEF at the same time, if they are all sufficiently excellent.

9 Do you agree with the proposed approach to incentives for the different types of provider? Please give reasons for your answer.

Not sure

Please type your response in the text box:

Individual members may address this.

10 Do you agree with the focus on teaching quality, learning environment, student outcomes and learning gain? Please give reasons for your answer.

Yes

Please type your response in the text box:

CHEAD welcomes this focus but is concerned that the relationship between pedagogy and the outcomes for students, as measured by the TEF, isn't clearly articulated. We feel it is of the utmost importance to retain the culture of experimentation, innovation and risk-taking which characterises the creative sector. In the absence of a clear concept of what constitutes high quality education for the Art & Design Sector (and more generally), the 'technical' methodologies may instrumentalise education and come to define 'quality' in and of themselves rather than being a metric designed to reveal quality as defined by wider society and economy.

TEF should measure employability rather than employment as (a) it will be impossible to find a reliable, empirical, link between added value through teaching and graduate salaries – particularly given the employment structures characteristic of the creative industries. We would propose a stronger focus on pedagogic evaluation and value-added. [Johnny Rich, Employability – Degrees of Value, HEPI 'Yellow Book' 2015]

Please also note our view that research and teaching should not be forced into competition outlined in Question 27 below.

There is also very little thought given to interdisciplinarity - for example joint degrees. BIS may need to give this more thought in the Technical Consultation.

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? Please give reasons for your answer.

Yes

Please type your response in the text box:

Again, CHEAD has significant reservations. There is an assumed relationship between teaching excellence, the GPA and employment. In art and design there is a need for students to take risks, sometimes this means that they 'fail' but they may learn a great deal from doing so. This system effectively eliminates what is left of risk-taking as so much hinges on good feedback and high grades. It is crucial for the A & D sector to maintain learning environments which encourage risk, innovation and creative expression and we are very keen to ensure that the technical implementation follows the needs of the sector as a whole rather than teaching and learning practices being shaped by the metric approach.

CHEAD would very much value opportunities to participate in the technical consultation on how 'excellence' will be defined and measured and the statistics from the NSO which it is intended to rely upon. We understand that, at this stage, the kind of statistics envisioned are not yet collected or available. We consider it absolutely vital that the Art & Design sector will have the opportunity to ensure that excellence frameworks envisioned from Year 2 of TEF are not developed on a 'one size fits all' basis. If this is to be the case, as may be indicated, it is unclear what the relationship of cross-institutional specialist panels for different subject areas would be to the overall rating of specific HEIs.

We are concerned that over-emphasis on statistical evaluation may lead to additional less desirable outcomes for our sector:

Over-emphasis on graduate salaries is of particular concern. Taking aside the difficulties in defining or measuring any relationship between value-added by HEIs and raw income data, it is important to consider that the creative industries, despite their substantial contribution to the UK economy, comprise a sector in which graduates are historically willing to accept low pay and insecure conditions in order to express their creative passion in their work. This tradition is part of the innovative and risk-taking nature of our sector which its HE practices must foster and reflect.

In terms of students' employability after graduation, earnings may not be an accurate reflection of success in a freelance or where a practitioner is working globally, as many art and design graduates do. Also, research [Linda Ball Emma Pollard Nick Stanley, Creative Graduates Creative Futures, Creative Graduates Creative Futures Higher Education partnership and the Institute for Employment Studies, 2010] has shown that in art and design practitioners tend to have 'portfolio' careers – and data collection will thus be deeply flawed and accurate interpretation by HEIs themselves, students or employers impossible.

If graduate earnings are to be linked to fee levels, this could lead to specialist, creative HEIs which feed a sector contributing £71.7bn in gross value added (GVA), equivalent to 7.2% of total GVA and accounting for 1.71m jobs [The Design Economy, Design Council Report 2015; Statistical Release: Creative Industries Economic Estimates, January 2015] to the UK economy facing low fee caps and rising costs for specialist Art & Design courses requiring costly, specialist equipment.

Retention metrics are also unreliable and likely to put the institutions that do most for widening participation at a disadvantage. There is a well-known positive correlation between recruitment of disadvantaged students and drop-out rates. Government is right to seek to address drop-out in HE, but the TEF proposal is likely to have the opposite effect, by disincentivising recruitment from high-risk disadvantaged backgrounds. If BIS is intent would be preferable to understand how institutions support student success through the proposed institutional narrative or evidence in Access Agreements.

In the forthcoming Technical Consultation, BIS should place more emphasis on differentiation across subjects, pedagogies, or institution-types, rather than just focusing on differential standards. It is impossible to understand teaching quality without understanding these variables.

The Technical Consultation should link to other current developments around teaching, learning and quality, including QA review, QAA Subject Benchmark Statements review (which has a focus on criteria for "excellence"), and HEFCE Learning Gain pilots (which focus on measuring "value-added"). See our response to Q5(c) above. These initiatives are all consistent with the principles for TEF set out in this section of the Green Paper.

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

12a Do you agree with the proposals to further improve access and success for students from disadvantaged backgrounds and black and minority ethnic (BME) backgrounds? Please give reasons for your answer.

Yes

Please type your response in the box provided:

We welcome initiatives to widen participation but are concerned that the approach being proposed may actually lead to increased opacity of information for students from disadvantaged backgrounds who may have access to limited information about employment practices in the creative sector and who may be offered a misleading picture of employment prospects in the sector. If diverse students are discouraged from creative education, this will have a knock-on effect on employers in the sector where innovation is key and diversity is a known driver for innovation [Fostering Innovation Through a Diverse Workforce | Forbes Insights, 2014].

The planned cuts to HEFCE Student Opportunity funding will make the target extremely difficult to achieve. BIS should be wary of the review of S.O. funding penalising the institutions that already do most to widen participation.

12b Do you agree that the Office for Students should have the power to set targets where providers are failing to make progress? Please give reasons for your answer.

No

Please type your response in the text box:

The authority for setting targets should remain with institutions only. This view is aligned with OFFA's own view, which states that "responsibility to set targets should remain with institutions", and recognises that institutions are best placed to understand their widening access context.

12c What other groups or measures should the Government consider?

please type your response in the text box:

Individual members may address this question.

13a What potential benefits for decision and policy making in relation to improving access might arise from additional data being available?

Please type your response in the text box:

Qualifications reform in the pre-HE sector also threatens to marginalise Art & Design within the curriculum and this will stifle progression to HE in one of the UK's key industrial sectors. BIS or the OFS could help the HE sector better target their outreach efforts by expanding our understanding of trends in pre-HE qualifications and the pipeline to HE in non EBacc subjects.

13b What additional administrative burdens might this place on organisations? If additional costs are expected to be associated with this, please quantify them.

Please type your response in the text box:

Individual members may address this question.

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

14 Do you agree with the proposed single route into the higher education sector? Please give reasons for your answer, including information quantifying how the potential cost of entry would change as a result of these proposals.

Yes

Please type your response in the text box:

Individual members may address this.

15a Do you agree with the proposed risk-based approach to eligibility for degree awarding powers (DAPs) and university title? Please give reasons for your answer.

Yes

Please type your response in the text box:

We broadly welcome a light-touch approach reducing the burdens on established HEIs but have some concerns about the transparency of this approach to students and employers as well as its relation to the concept of a 'level playing field'.

We are also concerned that previously healthy institutions struggling to cope with lowered fee-levels may engage in risky entrepreneurial behaviour causing an 'invisible' gradual damage to sustainability. Therefore there should be established triggers for additional review which will, of necessity, be external. In addition, therefore, there is no guarantee that these will not actually lead actually to higher levels of bureaucracy, at least initially, as has been experienced elsewhere. [Roger King, The risks of risk-based regulation: the regulatory challenges of the higher education White Paper for England, HEPI, 2013]

15b What are your views on the options identified for validation of courses delivered by providers who do not hold DAPs?

Please type your response in the text box:

This may be answered by individual members.

16 Do you agree with the proposed immediate actions intended to speed up entry? Please give reasons for your answer.

Not sure

Please type your response in the text box:

Without more detail as to the processes by which new providers will establish track record in a risk-based approach, we are concerned that quality could be impacted if new providers do not have to fulfil adequate time-based requirements for proven delivery and institutional track record.

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

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? 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.

Yes

Please type your response in the text box:

Individual members will address this question.

Simplifying the higher education architecture (Part C)

18a Do you agree with the proposed changes to the higher education architecture? Please give reasons for your answer.

Yes

Please type your response in the text box:

We welcome simplification of the current system. However, merging funding and quality regulation in the OfS may lead to a risk of conflict of interest and to academic and institutional autonomy. In addition, some positive elements of the current system could potentially be lost. In particular: (1) the oversight of both teaching and research in a single body (if the Nurse proposals are carried through), and (2) the lack of reference to OFS being a body focused on HE providers (as well as students and regulation) could compromise the existing buffer role between Government and universities which HEFCE and its predecessors has been able to balance effectively for the best part of a century. The huge public benefit which HE provides through autonomous institutions is evidence that this buffer role has worked well.

18b To what extent should the Office for Students (OfS) have the power to contract out its functions to separate bodies?

Partially

18c If you fully or partially agree to question 18b, which functions should the OfS be able to contract out?

Please type your response in the text box:

This should be permitted and is positively desirable in order to maintain separation of functions, avoid conflict of interest, and maintain the autonomy of higher education. However, it is important that bodies charged with such functions should incorporate the appropriate academic expertises.

In light of 18(a) above, we believe that OfS should contract out evaluation functions in TEF and in risk-based monitoring.

18d What are your views on the proposed options for allocating Teaching Grant? Option 1: BIS Ministers set strategic priorities and BIS officials determine formula. Option 2: BIS Ministers set strategic priorities and allocation responsibilities divested to OfS

Matrix 1 - Option 1:

Disagree

Matrix 1 - Option 2:

Agree

Please give reasons for your answer to question 18d

Please type your response in the text box:

In order to minimise conflict of interest and maximise transparency and autonomy for HEIs, allocation of teaching grant, whilst linked to evaluation results, should be separated from evaluation functions and at arms-length from BIS. We would therefore consider this a function of OfS given that its evaluation role should also be at arms-length.

We are particularly concerned that the current allocation of banded grant to subjects that are costly to deliver is likely to cease. A & D courses are often associated with higher costs due to the need for specialist equipment. This is likely to intensify as the creative industries become increasingly technological. The A & D HE sector is at the forefront of modelling 'STEAM' initiatives and this important stream of activity could be threatened if funding is not available to support courses which are expensive to deliver but which support an important sector of the UK economy.

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

Not sure

Please type your response in the text box:

This may be addressed in detail by individual members.

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

Please type your response in the text box:

Student participation in defining 'excellence' in teaching, learning and student engagement has not been proposed. CHEAD believes that Student Unions play an important role in widening participation and in student engagement. We believe that Student Unions should be strengthened to play a key role in defining student engagement and in developing the technical definitions of TEF.

21a Do you agree with the proposed duties and powers of the Office for Students? Please give reasons for your answer.

Yes

Please type your response in the text box:

We very much welcome the protection of the institutional autonomy and academic freedom traditional to the sector and broadly support modernisation of the regulation of the sector and the creation of a 'level playing field'. Besides inheriting much of HEFCE's function, however, it seems unclear exactly what these functions will be. We are concerned that powers to validate providers' courses should be an academic function. Where will the expertise for the OfS to perform this function be drawn from, will this be vested in 'panels' as with the REF? How will specific subject areas be represented?

The Green Paper states that OFS will operate a 'risk-based' system, but gives very few details of what this system will look like.

The OFS should have the power to contract out certain responsibilities such as data provision, quality assurance, validation arrangements, student complaints - as at present.

There should be a provision that the Director of Fair Access would remain a separate post within the OFS, rather than be absorbed into the duties of the chief executive.

OFS should have the responsibility for allocating teaching funding.

21b Do you agree with the proposed subscription funding model? Please give reasons for your answer.

Not sure

Please type your response in the text box:

A subscription model is viable elsewhere, however, more clarity is required with regard to the actual costs and how these may vary from institution to institution. Individual members may respond in more detail.

22a Do you agree with the proposed powers for OfS and the Secretary of State to manage risk? Please give reasons for your answer.

No

Please type your response in the text box:

Again, we are concerned with separation of powers and the basis for such direct interventions.

22b What safeguards for providers should be considered to limit the use of such powers?

Please type your response in the text box:

Such powers should be at arms-length from direct governmental action.

23 Do you agree with the proposed deregulatory measures? 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

Not sure

Please type your response in the text box:

Individual members may reply in detail.

Reducing complexity and bureaucracy in research funding (Part D)

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?

Please type your response in the text box:

In the light of the Nurse review the most positive aspect of the new structures is that there would be efficiency gains through reducing the administrative burden of completely separate research councils. There is also value to improved co-ordination between research councils – though it isn't clear how effective this would be in practice.

At present interdisciplinary research can be hard to fund unless it falls within the remit of a specific call as it falls between the remit of two or more councils. The present process for resolving remit queries is inefficient and ends at the point of submission (thus reviewers and panel members may later rule that the application is outwith the remit of the council). It is not clear therefore that the new structures would resolve this state of affairs – though one could imagine it would be easier to set up a common process for decisions on interdisciplinary proposals.

There are also differences in practice between research councils that remain puzzling (e.g., not all councils have an early career grant system) because they reflect local responses to tightening budgets rather than differences in strategy appropriate to their remit.

One major concern is that the focus of the institutional research landscape is on the present picture and somewhat neglects the next generation of researchers and research leaders. The removal or reduction in early career and small grant funding and the changes in doctoral training have had placed a major burden on our research infrastructure. HE institutions have recognized this threat and adapted to it but at some cost. For example, the Nurse review recognizes that: "Doctoral training programmes if too inflexibly applied can prevent graduate students being supervised by quality researchers who are not part of such programmes. Mechanisms should be in place to prevent this unfortunate outcome, by maintaining diversity in the support available for graduate students." This creates tension between teaching and research (which need not exist) as teaching income is used to finance PhD bursaries. Widening participation is damaged when it is common practice for research-intensive HEIs to advertise fees-only or entirely unfunded studentships.

25a What safeguards would you want to see in place in the event that dual funding was operated within a single organisation?

Please type your response in the text box:

The Green paper proposes, in the context of the teaching block grant: "A duty to protect academic freedom and institutional autonomy would ensure that ministers and officials could not single out specific institutions and this could be supported with an independent advisory committee." This should apply also to research

funding – perhaps more so given the importance of the Haldane principle. The recommendation of the Nurse review that the level of research block grant funding should be protected also needs to be implemented. The body that oversees distribution of such funding also needs to have autonomy and a strong voice within RCUK.

25b 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? Please give reasons for your answer

Yes

Please type your response in the text box:

A degree of hypothecation is essential.

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?

Please type your response in the text box:

The main benefit to members providing external validation of a number of areas of international and world leading research is that this complements a reputation for high quality teaching. This is particularly the case for research impact.

The main benefit of REF across the sector are that it raises the international profile of UK research and thus has reputational and consequent benefits (e.g., income from international students; investment from international companies; increasing the attractiveness of scientific collaborations with UK partners).

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

Please type your response in the text box:

First, the equality and diversity procedures need to be simplified. The underlying principles behind the procedures was not a problem – but the implementation was unnecessarily burdensome and guidance from HEFCE was unclear or lacking. Nor did it address the alleged discriminatory practices of some HEIs where there is suspicion that certain categories of staff (those with long-term health problems etc.) were forced onto teaching-only contracts or into early retirement. It would also make sense to encourage non-discriminatory behaviour by rewarding institutions that hit or exceed key benchmarks rather than creating a complex system that is costly to implement and hard to audit.

Second, research and teaching should not be forced into competition. For example, research funding is assessed as a research output when it is a research input. This places additional pressure on research active staff to apply for funding which already in scarce supply – leading to inefficient strategies such as HEIs that set targets of the number of research applications each year (e.g., 1 for a junior research and 3 for a senior researcher). This leads to large numbers of poor quality applications to RCUK or to staff spending more time writing high quality bids that are not funded (and thus less on teaching) or both. Similarly concentrating RCUK PhD studentships in doctoral training centres leads to more teaching income being diverted to fund research outside those centres. The Teaching Excellence Framework needs to avoid this where possible (e.g., including metrics for research-informed teaching).

Switching to a metrics-based approach might appear to be an option to reduce costs but is likely to be counter-productive. For example, it is easier to increase the citations for a paper than to write a better paper. So a metrics-based REF would produce a switch of resource to improving metrics directly rather than improving the underpinning research. Other metrics such as income are inputs rather than outputs of research. If a metrics-based approach is used then a large basket of metrics that are difficult to game and that are not closely correlated need to be used. In particular, it is important to include metrics that reflect a healthy research community and that either can't be gamed or can't be gamed without damaging metrics that can be gamed. For example, metrics such as balance of age profiles, gender profiles and ethnic diversity of would balance out metrics that require exclusion of junior (but no longer ECR researchers). A research-informed teaching metric could contribute to both TEF and REF.

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

Please type your response in the text box:

With respect to open science, rather than encouraging hundreds of separate institutional publication and data repositories to be set up, it would have been preferable to set up, or facilitate the set-up of, a single central system at a national or international level. Where stakeholders have worked together to provide common systems (e.g., the ORCID) this has been more successful.

Comments on the consultation

Do you have any 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.

Please type your response in the text box:

CHEAD represents a wide diversity of institutions within the Art & Design HE sector. In many instances we felt that there was insufficient clarity in proposed implementation which made it difficult for us to indicate clear agreement or disagreement or to comment in detail on likely impacts for all of our member HEIs.