Department for Business, Innovation & Skills

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

You can reply to this consultation online at:

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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 Chartered Institute of Library and Information Professionals (CILIP) is established by Royal Charter and is the professional body for library and information professionals in the UK. We have around 13,000 members working in all parts of the UK economy, many in higher education, and we welcome the opportunity to comment on the proposals in this Green Paper.

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?

Answer: CILIP welcomes the focus on equality and diversity in this Green Paper. However, whilst it is imperative that universities work to ensure that their courses are available to all those who are qualified by ability and attainment to pursue them, the disadvantages that prevent many people from aspiring to attend university, or from attaining the grades necessary to secure a place, should be addressed at the same time. In our response to question12 we set out the important role that libraries across a range of sectors play in widening participation and increasing social mobility.

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

✓ Yes   ☐ No   ☐ Not sure

Please provide any further relevant evidence.

Answer: The equality impacts pertaining to carers, part-time, distance learners and mature students have not been adequately considered.

Courses of Higher Education should be open to all, and CILIP welcomes the announcement in the 2015 Comprehensive Spending Review that maintenance loans will be made available to higher education students who study part time from 2018. In a UK context, 28% of HE students can only study part-time, a group that is disproportionately represented by mature students from disadvantaged backgrounds[1]. However, despite these changes to part time access, and the emphasis on the importance of universities meeting the needs of employers, the impact on mature and part-time students, many of whom are already in employment, or who wish to re-train, is not acknowledged.

Libraries and information services have been innovative in their delivery of services to students studying by non-traditional modes, which will include many carers, part-time and mature students. We are concerned that an increased emphasis on competition will threaten existing and potential partnerships and collaboration between HE library and information service providers, such as the SCONUL Access scheme[2], which is especially beneficial to students studying by non-traditional routes, as well as the wider public, especially the independent learner.

We also share the concerns of many that higher fees may act as an additional barrier to participation and we believe that fee increases should be decoupled from performance in the proposed TEF.

Finally, we would welcome consideration of the equality impacts on staff in higher education institutions.

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[1] Butcher, J., 2015. Financial risk and inflexibility: part-time HE in decline. *Widening Participation*, Vol 17 (4), pp89-104
[2] http://www.sconul.ac.uk/sconul-access

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.

Answer: We note that a technical consultation will be run in 2016 which will cover the operational detail of metrics and of the assessment criteria, process and outcomes, as well as looking at the evidence to be submitted alongside applications and how it will be used for provider level assessment. CILIP will be better positioned to respond to this question once this consultation has taken place and it is clear what TEF is measuring and what information will be made available. However, we wish to make the point that prospective students will not benefit from this additional information if they lack the necessary skills to make the best possible use of it. Later on in this response we address the importance of good information literacy skills (see Q12).

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.

No Comment

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?

Answer: CILIP believes that an approved Access Agreement should be a pre-requisite for a TEF award.

Question 5: Do you agree with the proposals on:

a) what would constitute a 'successful' QA review

☐ Yes ☐ No ☐ Not sure

No comment

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

☐ Yes ☐ No ☐ Not sure

No comment

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

☐ Yes ☐ No ☐ Not sure

No comment

Please give reasons for your answer.

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

Timing?

☐ Yes ☐ No ☐ Not sure

No comment

Assessment panels?

☐ Yes ☐ No ✓ Not sure

Answer: CILIP liaised with the Society of College, National and University Libraries (SCONUL)[3] in the preparation of our response to this question, and to questions 10 and 14.

CILIP and SCONUL strongly recommend that professional librarians be included in assessment panels to ensure that the panels achieve a broad and holistic understanding of teaching at an HE institution.

Libraries and information services are an integral part of teaching and learning within higher education institutions and have a significant impact on the quality of the learning environment and learning outcomes. Academic librarians deliver services to support a variety of learning styles and activities, course delivery methods and attendance patterns thereby ensuring access to the UK and international knowledge base. As well as supporting teachers in the development of HE students as independent learners by incorporating information and digital literacies into the curriculum, many library and information professionals teach information skills, thereby making an invaluable contribution to the development of a workforce and citizenry that has the skills to think critically, learn, innovate and exploit new opportunities. A number of CILIP members have achieved professional recognition for their teaching practice and some have been awarded the HEA National Teaching Fellowship.

The three areas of focus mentioned below (teaching quality, learning environment, and student outcomes and learning gain) are areas where librarians are well positioned to provide expertise and relevant experience in evaluating excellence. It is

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[3] SCONUL's response is available at
http://www.sconul.ac.uk/sites/default/files/documents/SCONUL%20Response%20to%20HE%20Green%20Paper%2018Dec2015.pdf

also a group with a strong history of using data to evaluate and improve services. We concur with SCONUL that these voices should be included alongside those of academics, students and employers in a panel charged with assessing an institution's teaching excellence.

and process?

☐ Yes　　　☐ No　　　　　☐ Not sure

Please give reasons for your answer.

No comment

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.

Answer: We recommend where possible that existing benchmarking data, such as the library data collected and made available by SCONUL, be used to minimise administrative burdens and costs, although we recognise that additional qualitative and quantitative evidence will be required if meaningful evaluations of teaching excellence are to be made.

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.

Answer: Whilst we see benefits in differentiation that allows students and other stakeholders to compare courses, it will be difficult for library and information services to provide subject level information about spend on library service provision. This is due to, for example, the provision of generic resources, content being bundled and the sharing of staff roles. It is also not possible to disentangle spend on library resources to support teaching from spend on resources that support research.

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.

No comment

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.

Answer: Yes, we agree that the three areas of focus provide a good starting point for evaluating teaching excellence. We would amplify that information literacy[4] plays an important part in all three of these criteria and is a key part of the contribution that staff at university libraries make to teaching excellence. We look forward to developing this point in full in our response to the technical consultation, as well as discussing in more depth the specific metrics related to these three areas.

We wish to make the following points, however.

CILIP notes an absence in the descriptions of these areas with regard to learning space, particularly the library, and professional services staff. Strategically designed learning spaces, both physical and virtual, are supported by professional staff and connect students to the resources and services required to enable their learning. Librarians provide teaching staff with the scholarly content for remaining up-to-date in their academic fields and pedagogical practice. Choosing metrics in the areas of teaching quality and learning environment that do not regard the value of learning spaces, particularly the library, will provide review panels with less -than-adequate information with which to evaluate teaching excellence.

CILIP supports the proposal made by SCONUL in its response that, under 'teaching quality', the third bullet point is amended to read[5]:

• The courses, curriculum design, learning spaces (eg, the library), teaching and assessment are effective in developing all students' knowledge and skills.

Under 'learning environment', we note the description: 'this is the wider context of teaching and associated resources to support learning within an institution, and ensuring the student develops the ability to study and research independently' (Chapter 3, point 8). The bullet points which follow, however, fail to include any indication of how these supporting resources are developed and delivered. The library provides these resources and supports students with services to develop these independent research skills essential for employment.

CILIP supports SCONUL's recommendation that an additional bullet point is included in this description:

• Quality assured learning resources and professionally supported services and spaces are in place to ensure academic success and employability of students

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[4] Information literacy, as defined by CILIP as 'knowing when and why you need information, where to find it, and how to evaluate, use and communicate it in an ethical manner
[5] http://www.sconul.ac.uk/sites/default/files/documents/SCONUL%20Response%20to%20HE%20Green%20Paper%2018Dec2015.pdf

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.

Answer: CILIP welcomes the government's expectation that any metrics will be valid, robust, comprehensive, credible and current (p33) and we will take the opportunity to respond in detail to key principles for metrics and institutional evidence when the separate technical consultation is launched later in the year. However wish to make the following points here:

- With regards to the National Student Survey (NSS), the Green Paper recognises "that these metrics [NSS etc] are largely proxies rather than direct measures of quality and learning gain and there are issues around how robust they are" (P33 para 13). CILIP endorses this view as there is an explicit criticism of NSS that notes its lack of reliability and recognises that surveys such as these are proxy rather than real measures of excellence [6]. In May 2008, when the SCONUL working groups on performance improvement and quality assurance jointly sought feedback from members on the value and impact of the survey, concerns with the library question (Q16) were identified, for example. These included the absence of a focus on the level of support for learning provided by the library service, or the electronic aspects of the service, which play an increasing part in overall service provision[7].

- As well as a measurement of teacher contact time, there needs to be adequate recognition of how independent learning, and a commitment to lifelong learning, is supported and developed. Library and information professionals in HE institutions deliver services to support a variety of learning styles and activities, course delivery methods and attendance patterns.

- The provision of library resources for disabled students is not entirely under the control of Higher Education Institutions, as publishers have a great deal of influence over access and availability. Whilst recent changes to UK copyright law have made it easier for HE libraries to make accessible copies for their disabled students, where there is no commercial alternative available, Technological Protections Measures (TPMs) often make this process laborious. Section sections 296ZE and 296ZEA of the Copyright, Designs and Patents Act 1988 allows for a notice of complaint to be lodged with the Secretary of State to request for a TPM to be removed if a rightsholder will not agree to is removal, but recent research by the Libraries and Archives Copyright Alliance has found that this process is very difficult to use.

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[6] Add link to evidence to support this.
[7] Stanley, T, 2009. The National Student Survey, Pain or Gain? Sconul Focus, Vol 45

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.

Answer: Yes, CILIP welcomes the Government's commitment to do more to open higher education up to people from all backgrounds and ensure they have successful outcomes at the end of their course. HE libraries and information services are committed to supporting aims in widening participation and social mobility, providing tailored support to students from disadvantaged backgrounds and developing innovative services to students studying by non-traditional modes. In addition to supporting students who are enrolled at their institutions, some library and information professionals are now participating in university school and college outreach events designed to encourage young people to aspire to apply to university, and to introduce them to the resources available.

However, as noted in the Green Paper, "prior educational attainment is the key factor in determining progression" (p37). Any ambition for further progress in widening participation should recognise the important role that information professionals in school, further education and public libraries play in this.

Information literacy is central to the university learning experience, yet research has demonstrated the existence of a skills gap, with students arriving at university lacking the information literacy skills required to locate and engage with resources such as academic journals. School and FE librarians can bridge this gap by teaching the skills that enable students to find, evaluate and synthesise information from a range of sources that are relevant to their chosen disciplines once they progress beyond secondary or further education.

As recognised in the 1997 Dearing Report[8], HE in FE contributes to the widening participation agenda and should be considered as a means of achieving social justice. Library and information professionals deliver library services and support information literacy skills provision for students studying HE level programmes delivered in the FE environment. If students are to benefit from the higher education

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[8] Dearing, R (1997) Higher Education in the Learning Society: Report of the National Committee London: Her Majesty's Stationery Office/The National Committee of Inquiry into Higher Education

experience they need access to resources, spaces and support which enable a learning experience appropriate for higher education.

Public libraries also engage with disadvantaged and hard-to-reach groups, providing not only free and equal access to information, reading and learning resources, but also through the promotion of literacy and information literacy, and by empowering people to be confident users of digital technology, key skills for progression into higher education.

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.

No comment

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

No comment

Question 13:

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

No comment

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

No comment

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.

Answer: Throughout Part B, Chapter 1 of the Green Paper, there is mention of

minimum standards for new entrants, though they are not stated explicitly. CILIP supports recommendations made by SCONUL[9] in its submission that any minimum requirements embedded in this single route recognise the strategic value of the library for higher education providers of all mission groups and modes of learning. It would be unrealistic to suggest that these minimum standards could be met without the provision of an academic library with its provision of space, resources and professional support. We also share SCONUL's belief that new entrants are likely to rely heavily on online delivery of teaching and learning and that the library is essential in these virtual environments for the reasons set out below:[10]

- An abundance of online resources has made the library's role in quality assurance and strategic purchasing of content increasingly important to institutions.

- Though more and more resources are available online, students have shown no decrease in their usage of library space and services.[11]

- Collections of electronic or print resources that support teaching and research excellence require a professional understanding of a complex and changing scholarly communications market as well as an understanding of the institution's academic enterprise. This knowledge and expertise lies with librarians

- Creating the virtual and physical learning spaces to meet the needs of a diverse student body requires significant investment, not just in the structures themselves, but in understanding and evaluating the student experience to make those spaces fit for purpose. Librarians are equipped with the skills and information to develop and support these spaces.

CILIP agrees with SCONUL's conclusion that an abbreviated process may make "simplifying assumptions about the investment required to lay the necessary foundations for creating a sustainable higher education provider. One of these foundations for any HE provider is certainly the library"[12].

We also wish to express our concern about the possible impact on sector-wide procurement of library resources if a publisher is also a provider. Such a scenario would present a conflict of interest that could exacerbate "the serials crisis"; the inability of library budgets to keep pace with the prices set by publishers.

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[9]http://www.sconul.ac.uk/sites/default/files/documents/SCONUL%20Response%20to%20HE%20Green%20Paper%2018Dec2015.pdf
[10] Ibid
[11] See 'Changing trends in loans, visits & the use of e-books', SCONUL, 2015 http://www.sconul.ac.uk/sites/default/files/documents/Analysis%20_Loans%20ebooks%20visits%20June%202015.pdf [accessed on January 8th 2016]
[12]http://www.sconul.ac.uk/sites/default/files/documents/SCONUL%20Response%20to%20HE%20Green%20Paper%2018Dec2015.pdf

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.

No comment.

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

No comment.

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.

No comment

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.

Answer: Yes. Students should be able to continue their studies, and continue to have access to appropriate learning resources provided by an HE library and information service.

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.

Answer: CILIP is concerned that the proposed reconfiguration fundamentally ignores the inextricable link in most Higher Education Institutions between teaching and research. This link informs teaching and learning and brings economic and epistemological benefits to both.

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

Answer: We are concerned that a network of independent quality assurance bodies could negate the Green Paper's ambitions to simplify the HE architecture.

As quality is a key pillar of UK HE, we also have concerns about the implications for the sector should quality assurance being contracted out overseas.

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

No comment

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,

Answer: CILIP prefers Option 2. Despite assurances given under Option 1 that academic freedoms and institutional autonomy will be protected, the provision for prioritising the Teaching Grant under this option still presents a greater risk of ministerial interference. It is imperative that the curriculum is not politicised and narrowed by a focus on pure market returns that favour STEM subjects over the social sciences and humanities, for example.

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.

Answer: Whilst we see benefits in the proposal for a single, transparent and light touch regulatory framework for every higher education provider, we seek clarification on who would scrutinise data provided by HEIs.

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

Answer: Student Unions are key partners in the delivery of library and information services and CILIP would welcome an enhancement of their representational role. Their autonomy must be assured to ensure that they can effectively carry out this important role, however.

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.

Answer: CILIP broadly agrees with the proposed duties and powers of the Office for Students. However, the proposal to separate teaching and research made throughout this Green Paper prevents proper consideration of the needs of research students.

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

☐ Yes   ☐ No   ☐ Not sure

Please give reasons for your answer.

No comment

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.

Answer: These powers are very broadly defined and allow for the future expansion of the OfS far beyond what is proposed in this Paper, even if the option of "a power to confer additional functions relating to education" is subject to parliamentary approval.

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

No comment

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.

Answer: Whilst we agree with the principle of a level playing field for providers, regulation is necessary to maintain the excellent international reputation of the UK HE sector and to protect the interests of students.   CILIP also believes that private providers, especially where they are in direct or indirect receipt of public funding, should be open to public scrutiny and therefore should also be subject to the Freedom of Information Act.

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?

Answer: We repeat our concerns about the proposed separation between teaching and learning; the best higher education teaching is informed by research and *vice versa*.

Question 25:

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

No comment

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

No comment

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?

No comment

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

Answer: There is a cost to designing and maintaining an institutional repository, so shared repositories that benefit from economies of scale, and which also broaden access, should be encouraged and supported.

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

No comment

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.

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