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CONSULTATION ON THE HIGHER EDUCATION GREEN PAPER – Fulfilling our potential: Teaching Excellence, Social Mobility and Student Choice

Submission from the British Society for Immunology (BSI)

The British Society for Immunology is the largest immunology society in Europe. We represent the interests of over 3000 immunologists working in academia, clinical medicine, and industry. Our main objective is to promote and support excellence in research, scholarship and clinical practice in immunology for the benefit of human and animal health.

SUMMARY

- The BSI is supportive of the objectives to raise the status and quality of teaching in higher education and to increase the quality and breadth of information available to students and employers. However, we do not think that the proposed Teaching Excellence Framework (TEF) as proposed in the Green Paper will deliver these objectives.
- The BSI strongly opposes the proposed link between TEF awards and tuition fee uplifts. We believe that as the tiered fee system develops there would be a detrimental impact on widening participation and associated social mobility particularly at the top tier institutions.
- The BSI is concerned that the timetable for the delivery of TEF is overly ambitious. We are worried that it is not be possible to develop the rigorous quality controlled assessment process that is required in the proposed timeframe.
- We are concerned about the administrative burden that TEF will bring to universities and the fact that this burden will likely fall on the teaching staff. Thus impacting on the time that they have available to them to dedicate to excellent teaching.
- We feel that the current proposed metrics are not able to measure teaching excellence. We support the development of new metrics providing that these are appropriately benchmarked and weighted to account for differences between disciplines. We strongly encourage the inclusion of a site visit as part of any TEF assessment, which we believe is the only true way to measure teaching excellence.
- We believe that to meet the stated aims, TEF awards need to be made at the discipline level not at the institutional level.

- We support the proposal for a transparent system both in terms of the data gathered but also of the review and award process.
- While the creation of the Office for Students and an as yet undetermined body to deliver, respectively, the teaching and research aspects of HEFCEs work may be beneficial to the community. We are concerned about where the cross cutting functions currently discharged by HEFCE will sit. We also feel that it is important that education and research are not siloed activities within the new higher education architecture.
- We are highly supportive of many of the proposals within the Nurse Review, however, the recommendations propose a substantive reform of the UK's research infrastructure and therefore we have concerns about how the details of the proposed changes will look in practice. We look forward to having the opportunity to comment more fully on the proposals once additional details are available.
- The BSI believes that the dual funding mechanism should be maintained and believe that a commitment to dual funding should be embedded formally within the constitution of the organisation distributing the two funds.
- We believe that the REF has had positive effects on the UK research community particularly through the impact agenda despite the immense burden and pressure it placed on them. We believe that one of the best ways to simplify the process would be to either leave it as it is or to omit certain components while leave the basic structure alone.
- The BSI believes that there should be cross-over between the TEF and REF ensuring that TEF recognises the importance of research-rich teaching and REF recognises the benefit of research on education. The cycle of assessment should be such that the TEF and REF do not occur simultaneously.

In addition to this response the BSI also supports the responses of the Academy of Medical Research Charities (AMRC) and the Royal Society of Biology (RSB).

BSI Consultation Response

Question 1:

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

The British Society for Immunology fully supports the government's efforts to recognise the importance of high quality teaching within the Higher Education (HE) sector and to improve transparency in the reporting of HE data. However, we are worried about the impact on social mobility if teaching quality is linked to tuition fee rises. Our concern is that such a linkage would result over time in a stratification of universities by fee level which could reinforce rather than resolve inequalities in student representation at those who already have lower institutions perceived to have the highest quality of education.

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.

The information provided by the metrics used to determine TEF levels at a departmental or individual course level would be beneficial for prospective students as a guide to the quality of teaching and the skills that they will learn during their time at the university. Unistat usage data¹ suggests a strong appetite from students for course specific information, and the inclusion of a wider range of measures within this dataset as a result of TEF will be beneficial for students. That said, the measures that TEF is based on will need to be able to accommodate the wide variety of teaching styles and learning experiences that higher education now involves and the variations between subjects to be fully useful to students and to allow comparisons of TEF scores between different departments. Potential issues include the variation in contact time between disciplines such as science & engineering versus the arts/humanities. Another issue is measuring the impact and quality of placements within courses and how these courses can be compared to those without placements.

An important element of STEM degrees is practical work and it is an area that is increasingly under pressure due to high costs and increasing student numbers². Practical work is essential to a student's skillset and their employability therefore we feel that including a measure for the amount of practical work available within a degree course within TEF is important.

The BSI is less sure about the benefits that an institutional level TEF award will bring for students. An aggregated level could hide individual department variation from students preventing them from getting the clarity of information on teaching provision that TEF is aiming to deliver. Evidence from surveys on university rankings shows that students prefer subject specific data rather than university wide data³ suggesting that they would get little benefit from institutional level TEF awards.

From an employer's perspective any benefit from TEF awards will also be at the discipline or course level. Employers focus on skill sets and attributions and therefore will require knowledge of individual course content. The accreditation of degrees has proved highly successful in the healthcare sciences⁴ to ensure the quality of graduates and the presence of required skills. Accreditation schemes also exist for a number of other subject areas^{5,6,7} and are expanding in their popularity with universities as a means of externally assuring the quality of their courses. Whether a course is accredited by a relevant scheme should be included as a measure within the TEF framework.

Employers are increasingly seeking to work with universities to tackle the perceived skills gaps through the provision of placements and advice on curriculum content. It has been suggested that universities with such links in place should be rewarded through TEF⁸ and the BSI supports this suggestion. With the caveat that such interactions are not available or appropriate for all courses and so there would need to be a weighting system for different disciplines developed or perhaps it could only be counted at the institutional level.

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?

¹ <http://www.hefce.ac.uk/It/unikis/usage/>

² *Undergraduate Practical Work Report*, Biochemical Society 2014

<http://www.biochemistry.org/Portals/0/Education/Docs/UG-Practical-Work-Report-Web.pdf>

³ *How do students use rankings?*, QS Intelligence Unit 2015 http://www.topuniversities.com/system/files/pdf-uploads/how_do_students_use_rankings.pdf

⁴ Institute of Biomedical Sciences, <https://www.ibms.org/go/qualifications/ibms-qualifications>

⁵ Society of Biology, <https://www.rsb.org.uk/education/accreditation>

⁶ Institute of Physics, http://www.iop.org/education/higher_education/accreditation/page_43310.html

⁷ Royal Society of Chemistry, <http://www.rsc.org/Education/courses-and-careers/accredited-courses/>

⁸ <http://www.unialliance.ac.uk/wp-content/uploads/2015/10/Mind-the-gap-web.pdf>

Yes No Not sure

Please give reasons for your answers.

If TEF is to be implemented then the BSI feels it should apply to all HE providers, all disciplines, all modes of delivery and all levels. To achieve this, careful planning will be required in terms of the data that is required to be submitted and how that data is scaled/rated to enable accurate and fair comparisons to be made in the awarding of TEF levels across such a diverse sector.

As a body, representing a discipline that is predominantly taught at the postgraduate level we would welcome the inclusion of postgraduate courses within TEF.

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?

The BSI believes that every HE institution should have an approved Access Agreement in place that supports students from disadvantaged backgrounds to not only attend higher education but to excel within their chosen area of study. This should be a prerequisite of receiving a TEF award.

However, the linkage of TEF award levels to higher tuition fees, we feel, goes against the notion of widening participation, as it is likely to result in a tiered education scheme where those from socially disadvantaged communities only apply to 'cheaper' HE institutions which offer a lower quality of education. The current loan system within the UK, is beneficial to students and has meant that HE attendance from disadvantaged backgrounds has not dropped significantly. However, any changes to the loan system that makes it less advantageous to students coupled with higher tuition fees would have an extremely detrimental effect on social mobility in the UK.

Question 5: Do you agree with the proposals on:

a) what would constitute a 'successful' QA review

Yes No Not sure

While we agree on what currently constitutes a 'successful' QA review, we are unclear as to whether QA is an appropriate measure of teaching excellence. The QA review assesses governance and student provision at an institution level, it does not directly assess teaching excellence nor does it assess provision at the individual course or discipline level. Therefore by giving institutions TEF level 1 based on a successful QA review, the government would not be providing students or employers with any of the benefits that TEF is supposed to give. Nor would it support one of the main aims of TEF, namely the recognition and improvement of teaching quality within HE.

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

Yes No Not sure

Any incentives attached to TEF should be made available to all providers within HE. However, we fundamentally oppose the link between tuition fees and TEF award levels due to the potential impact this could have on social mobility and efforts to widen participation. Given the current proposal that TEF level 1 is given based on an institution having a 'successful' QA award, something that is currently a baseline requirement for all HE institutions, we feel that the only incentive for achieving TEF level 1 should be the opportunity to apply for higher TEF levels in subsequent years.

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

Yes No Not sure

The proposed timeframe for the delivery of TEF is extremely ambitious. Given that the assessment process will be out for consultation in 2016 it seems unfeasible that the body responsible for managing TEF will be in a position to administer and review applications from universities in the 2017/2018 academic year in a quality controlled way. Such rapid roll out of differentiated TEF levels could also have a negative impact on some of those that TEF is designed to support, teaching staff, who may be placed under undue burden to meet TEF assessment criteria overnight to enable for submissions for higher TEF levels to be made.

There is a considerable risk that academic and administrative staff will be diverted into gaming the system in order to enhance university income, and that the focus on attracting funding by providing the required evidence will have a negative effect on teaching.

Question 6:

Do you agree with the proposed approach, including timing, assessment panels and process? Please give reasons for your answer.

Timing

The BSI supports the proposal that TEF should be of a cyclical award with a 3-5 year validity, with an option for institutions to apply for higher levels annually. However, the BSI has serious concerns about the potential burden placed on teaching staff should TEF renewal have to happen in the same year as a REF or a QAA assessment. We would like clarification on whether there will be a link made between the timing of TEF, REF and QAA. We feel that there needs to be a link between these assessments to ensure that not more than 1 occurs each year.

Assessment Panels

We agree that assessment panels should be independent from government and contain a mixture of educators, students and employers/professionals. However, careful thought needs to be given to the assessment framework to ensure it provides sufficient support to panel members given their different backgrounds. The body responsible for TEF must ensure that all panel members receive sufficient training to ensure that accurate and comparable judgements are given by the different panels each time they are convened.

The BSI strongly supports the need for discipline-specific panels to be convened to ensure that the panel's members have a full understanding of the pedagogic needs of that discipline. In biomedical sciences such as immunology this will include understanding of teaching through practicals and assessing the quality of learning during research placements.

One concern that we have is that while such panels will be independent from government, many members will be drawn from universities who will themselves be part of the TEF scheme. It may be difficult to ensure independence from their universities. In addition, for discipline level panels the pool of available academics with sufficient knowledge and expertise will be small and most likely highly interconnected making impartiality difficult.

Process

We agree that TEF assessments should be made independent from government and that the panels' judgements and the data submitted to the panel should be made public. This information could be

made accessible through one of the existing HE data websites such as Unistats or through a dedicated website as was produced for displaying REF data. Variation in judgements between panels is a concern and therefore we support the implementation of both a moderation process and an appeals process.

We would like clarification on whether institutes must pass stepwise through the TEF levels or whether institutes can apply immediately to the highest level.

In terms of institution visits as part of the TEF assessment. We do not believe it is possible to assess teaching excellence without a site visit. All the proposed metrics for assessment are only indirect measures of teaching quality, therefore we strongly recommend the inclusion of a site visit as part of the TEF assessment process. An additional issue with an over reliance on metrics and paperwork is that it will inevitably motivate universities to game the system rather than to truly improve teaching.

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.

Any assessment of teaching excellence will naturally create a burden on those staff who do the teaching. Universities need to protect these staff who are already over-pressured through the employment of administrators within departments to complete assessment submissions. We support the inclusion of existing metrics as part of the assessment to support administrative burden particularly when these metrics are embedded within the HE community such as QA review. Another source of data not mentioned in the TEF proposal but firmly embedded within HE is the Athena SWAN award run by the Equality Challenge Unit. The use of site visits to observe teaching rather than requiring the submission of contextual data to demonstrate teaching quality could potentially reduce the burden on teaching staff.

As we are not a HE institute we cannot comment on potential administrative costs. As an organisation whose members are both students of and teachers at HE institutes we can see that the delivery of a teaching excellence award could support our members. However, naturally our members who teach are particularly worried about the burden and pressure that it could put them under. Should the requirements of the TEF be too burdensome on individual teachers, then the framework is likely to have a detrimental effect on the quality of teaching in HE.

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

Yes No Not sure

In order to be useful to both students and employers TEF must be at the discipline level. It is highly unlikely that all disciplines within an institution will be of the same teaching quality, particularly early on in the TEF process, therefore aggregation of TEF at the institution level will provide inaccurate information and be unfair to staff and departments who receive higher awards than the aggregated level. It is important that the published data is of sufficient depth to enable students and employers to easily view individual discipline scores within the institute's TEF award, if it is aggregated.

Employers, particularly large companies, already have knowledge of the quality of teaching and learning from specific institutes based on the interviews they carry out with graduates and the students they receive on placements. Therefore employers are unlikely to accept an institute TEF level as a useful tool to them for gauging quality of HEI outputs.

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

Yes

No

Not sure

As stated earlier in this response the BSI strongly opposes the link between TEF awards and tuition fee uplifts.

We believe that differential fees will harm social mobility within the UK and efforts to widen participation. Currently all HEIs charge the same fees and therefore fee increases have not had a noticeable effect on widening participation, nor have they helped to improve the attendance rates of minority groups in HE. In the United States where fee differentials exist the highest socio-economic inequality to university access is witnessed⁹ suggesting that the socio-economic inequality that already exists in the UK, in terms of access to high-status universities, would be compounded by the introduction of differential fees.

As the awarding of TEF level 1 will be based only on the possession of a valid successful QAA award, we feel that there should be no incentive provided at this level to institutions, other than the ability to apply for higher TEF awards in the future.

The BSI feels that if any financial incentive is to be offered it should be in the form of ring-fenced teaching grants, which are offered to universities to enable them to reward excellence but also to improve the quality of teaching in departments that underperform within their institution. Indeed it could be argued that the purpose of TEF is to raise the level of teaching in all institutes and that therefore additional funds are awarded to raise quality rather than to reward excellence.

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

Yes

No

Not sure

The BSI agrees with the proposed areas of focus, but would suggest that there is a need to focus on the relevance of research-led teaching in HEIs. We feel that HEIs should aspire to excellence in both teaching and research rather than polarisation towards teaching or research. While we support the general areas of focus we have concerns about how comparable the proposed metrics are between different disciplines and provider types.

For teaching quality, TEF should consider looking for evidence of professional development that teaching staff have through indicators such as PGCap, HEA fellowship or Chartered Science Teacher status. However, we feel that the presence of a teaching qualification should not be a prerequisite for existing staff.

For student outcomes, we are concerned that the proposed use of employment data will not portray a truthful picture of student outcomes. There is large variation in salaries and employment opportunities depending on geographical location and also the chosen career path of a student. The location variation in particular needs to be taken into account when calculating TEF awards at the discipline level. Salaries are determined by wider market factors and are therefore not a good metric for quality of teaching within a discipline or indeed a university.

⁹ <http://www.sciencedirect.com/science/article/pii/S027656241500044X>

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? Please give reasons for your answer.

We agree with the concept of using common metrics from national databases as part of the TEF assessment, however how these metrics are benchmarked and weighted as part of the calculation of TEF awards needs to be clarified before we fully support this approach. It is vital that any calculations/benchmarking involved in the award of TEF levels are transparent and publicly available. We support the use of qualitative data as part of the TEF award, but wish to emphasise that all data should be evaluated in the context of the institution, its mission, and its student population (both in terms of size and demographics).

The proposed metrics for employment and earnings do not include overseas students potentially penalising institutions with a large cohort of international students. In addition and as stated earlier in this response, student employment and earnings are determined by external factors such as location, market demand and economic stability. There is the potential for huge variation within this data set that is not at all reflective of teaching excellence. Benchmarking of this dataset to accommodate this year on year variation will be important to insure the credibility of TEF awards given in different years.

There are also issues around the use of retention and continuation data. The use of continuation data will penalise HE institutes that are unable to offer higher research degrees. Retention data also needs to be used carefully, with the sociodemographic breakdown of students and study type (part-time courses are subject to higher dropout rates than full time degrees) fully taken into account.

We feel that while it is important to consider student satisfaction, it is a poor proxy for measure of teaching excellence, particularly as the challenge element of teaching can be unpopular with students. To enable the National Student Survey (NSS) to be a valuable metric for TEF, the survey should be adapted to include questions that are better suited to give an insight into student engagement¹⁰.

We are supportive of the need to develop new metrics particularly in the area of staff development and employment, to measure the investment that institutions are making in driving teaching excellence. Government may wish to consider the development of a teaching staff survey, similar to the researcher surveys CROS and PIRLS already carried out by Vitae¹¹ to report on implementation of the UK concordat to support career development of researchers.

In terms of the use of additional provider evidence, we feel this evidence will be vital to enable TEF to be an award based on teaching excellence as the sole use of proxy measure such as the common metrics would risk the credibility of the award. However, we would like to see a framework produced to guide institutions on the information that should be submitted. Wherever possible the additional evidence should be accepted in a wide variety of formats to enable the reuse of existing materials such as internal teaching observation forms, lesson plans, e-learning platforms or staff CPD records. Such guidance and flexibility is important to lessen the burden on teaching staff.

We support the idea to include the level of interaction between an institute and employers as part of TEF evidence as this has been shown to have a positive outcome on quality of teaching and

¹⁰ The consultation on changes to the NSS, Unistats and information provided by institutions http://www.hefce.ac.uk/media/HEFCE.2014/Content/Pubs/2015/201524/HEFCE2015_24.pdf

¹¹ <https://www.vitae.ac.uk/impact-and-evaluation/cros>

student outcomes¹². The involvement of professional and learned societies in course development is also welcomed.

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.

The BSI is fully committed to increasing the diversity of immunologists within the UK and therefore we are fully supportive of efforts to improve access and success for students from disadvantaged backgrounds and black and minority ethnic backgrounds. We agree with the proposed document where it states that efforts to improve widening participation need to go beyond enrolment and support students through to graduation and into further studies where appropriate as in the biomedical sciences such as immunology.

The proposal to include retention data within the TEF metric is likely to only show a fraction of the work that institutes do in this area and there is a strong case for the use of qualitative data such as case studies to demonstrate institutions work within this area.

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.

The lack of engagement with HEIs by those from disadvantaged backgrounds and BMEs is frequently matched by a lack of engagement in education at all levels. While it is important that HEIs engage in widening participation and student success they are not the only bodies whose work is vital in this area. The BSI is unclear about whether the setting of targets for HEIs would lead to the long-term cultural changes that are required to solve these problems.

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

Access of mature students, and particularly those in the process of retraining after career breaks

Question 13:

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

¹² <http://www.unialliance.ac.uk/wp-content/uploads/2015/10/Mind-the-gap-web.pdf>

If the additional data allows the longitudinal study of students then it would help institutions to understand and evaluate the impact of their widening participation work. This would help to drive effective policy making in the future and enable the sharing of best practise.

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

Administrative burden and additional costs will depend on the level of existing data analysis that exists in this area within an institute. The additional data may help to streamline analyses or it may result in additional analyses being required therefore bringing a cost increase. It is important that universities protect teaching staff from this by having sufficient support staff to carry out this work.

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

The BSI does not have expertise in this area.

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

As a body with student members, we support the proposal to require for providers to have contingency arrangements for students should their course be cancelled. Some institutions may already have such arrangements in place that can act as exemplars for the rest of the field.

Simplifying the higher education architecture (Part C)

The majority of this section is outside the remit and expertise of the BSI. However, we would hope that along with taking the functions of HEFCE, the OfS would also take many of the staff to ensure that the expertise and knowledge within HEFCE is not lost. Transfer of staff would also help with ensuring continuity for HEIs and aid in the delivery of this work within the proposed, highly ambitious, timeline.

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?

As the government acknowledges in this paper the UK has an excellent research base, which drives the internationally recognised quality of teaching within our higher education institutions. This is particularly true at the postgraduate level. We are highly supportive of many of the proposals within the Nurse Review, however, the recommendations propose a substantive reform of the UK's research infrastructure and therefore we have concerns about how the details of the proposed changes will look in practice. It is therefore difficult to respond to this question at the present time,

although we look forward to having the opportunity to comment more fully on the proposals once additional details are available.

The BSI is pleased that the Nurse review and the HE Green Paper recognise the importance of the dual support system to the UK research community, and that the Government continues to support research through the ring fencing of the budget. We are supportive of the creation of Research UK to represent the Research Councils nationally and internationally, to harmonise funding and data management practices and to provide leadership and strategy for the UKs research community. We are pleased that the Nurse Review recommends the maintenance of the research councils' individual identity, giving the councils the ability to focus on funding the best research and maximising outcomes from this work. We support Research UK holding funding to drive cross-sector collaborative research, which we feel will be very positive for ensuring the responsiveness of the UK research environment.

Sir Paul Nurse's recommendations include a proposition that the numbers and discipline coverage of the individual Research Councils may need to be reviewed periodically. We believe there is merit in investigating whether the Medical Research Council's Infection and Immunity Board can be separated to create distinct boards for the two areas. This is in response to anecdotal reports from our membership of an unconscious bias towards funding research on infectious diseases at the expense of basic immunology. Given the breadth of science conducted under the guise of these two entities of immunology (which are undoubtedly inextricably linked though can cover quite disparate research areas) we would urge any review to consider the possible benefits a separation could generate,

We have concerns about how certain functions of HEFCE that cross the boundaries of research and education will be distributed between the newly formed Office for Students and, whichever body gains the research functions of HEFCE. We would also like clarification over the Capital Grants currently administered by HEFCE and who will be responsible for their distribution in the future.

The inclusion of Innovate UK into Research UK could have highly positive impact on the commercialisation of research. However, Innovate UK must maintain its commercial focus and have the power to act independently of the other research councils.

While we support the idea of embedding science within government through the creation of a new ministerial committee we have concerns over the power and influence that this committee may have on deciding the direction of research funding through Research UK and by extension the research councils. The BSI believes that politically motivated decisions over research funding can be counterproductive and can have a negative effect on research quality.

Question 25:

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

We would want to see the principle of dual funding embedded at the constitutional level of the single organisation, Research UK. We feel that the current split between the dual funding streams are largely appropriate and should remain. The two budgets should be isolated and form non-transferable budget lines.

- 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 we would, through the inclusion of dual funding streams and their characteristics within the constitution of the awarding organisation to ensure that the process cannot be subject to managerial or ministerial whim.

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?

The BSI derives no institutional benefit from REF but our members participate directly in REF and are affected by the allocations that result from it. The BSI feels that the REF process has been beneficial to the sector producing valuable data and facilitating behaviour change in researchers, but that the immense amount of senior academic and administrative time that it has taken up has had a detrimental effect on the academic productivity of those involved. The impact agenda within REF has triggered a behaviour change in researchers in the UK increasing their focus on the outcomes of their research beyond papers and grants. The Impact case studies produced have provided a valuable evidence base for the sector, though accessibility and the metadata components with the case studies could be improved. We also support the efforts within REF to reward diversity within the research community.

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

The government has already commissioned a report into the simplification of REF, however, we feel that one of the best methods of both preserving the benefits and reducing the burden (both financial and administrative) would be to leave the REF as it is or to omit components of it while leaving the basic structure alone. While there were complaints over the gaming of the existing REF process by institutions in terms of the selection of researchers and outputs to be included, it is very unlikely that a non-gameable REF can be produced. Given the diversity of research outputs included within REF it is also unlikely that metrics can replace the value of the peer-review process.

A further way of reducing the burden of REF will be to ensure that it is complementary to and not in competition with TEF. There should be cross-over between the two processes ensuring that TEF recognises the importance of research-rich teaching and REF recognises the benefit of research on education. The cycle of assessment should be such that the TEF and REF do not occur simultaneously.

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

Good open research data management systems are important not only in developing a good strategy for government funded research but also for improving efficiency within the wider research community. The efforts of the MRC, through Researchfish¹³ and other organisations such as ORCID¹⁴ in reducing duplication and burden have been widely recognised by the research community.

Areas that could be improved are the interoperability of the existing databases and a more open access approach to the data within the systems.

¹³ <https://www.researchfish.com/>

¹⁴ <http://orcid.org/>