Goldsmiths

UNIVERSITY OF LONDON

Goldsmiths' response to the 'Fulfilling our Potential: Teaching Excellence, Social Mobility and Student Choice' Green Paper

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Goldsmiths is part of the world-renowned University of London, specialising in the arts, design, humanities, and social sciences. It was founded in 1891 as Goldsmiths' Technical and Recreative Institute by the Worshipful Company of Goldsmiths in New Cross, South East London.

An incubator for ideas
Creativity has always been the hallmark of Goldsmiths. Academic excellence and imaginative course content combine to make a place where creative minds can thrive and ideas are allowed to grow.

Our courses and research activities span the arts, humanities, social sciences, cultural studies, computing, business and management across 20 academic departments.

A world leader in new knowledge
Our academics co-operate across disciplines to create exciting new courses and develop novel approaches to research issues. Our interdisciplinary ethos has helped us to become a national leader in many subject areas.

The QS World Rankings place us in the top five UK Universities for Art & Design and Communication & Media Studies. In 2014 the Research Excellence Framework rated us in the UK's top 25 Universities for the quality of our research.

From Creative and Social Technologies to Anomalistic Psychology our teaching and research staff are combining their specialist knowledge to fashion new insights into 21st-century challenges.

A place where careers can grow
After graduating from Goldsmiths, many of our alumni have played leading roles in shaping contemporary British culture.

The perfect partner for business and industry
Because many of our tutors are practising professionals in their field, we understand how business and industry works, what it wants and how it constantly changes and evolves. Every student has the opportunity to get work experience so they can graduate equipped with the skills and experience they need when they enter the workforce.

We have comprehensive and long-established links with regional, national and international employers who know from experience when they hire a Goldsmiths graduate they're hiring a graduate of the highest calibre.

A caring community
At Goldsmiths we're a close-knit community that sees everyone as an individual with their own strengths and needs. We have teams dedicated to helping students with disabilities or offering financial advice.

Embracing the global citizen
Because we're just 10 minutes from the centre of London; because we have students from 114 different countries; because many of our courses offer the opportunity to spend time studying abroad, Goldsmiths truly embraces the global citizen.

Students coming from other countries will find a thriving international community and enjoy the experience of studying in one of the world's major cities. UK students can expand their horizons through the opportunities to travel and make friends from around the world.

Our alumni have gone on to build lives and careers on every continent and to become our ambassadors across the globe.

Public sector equality duty

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

We believe that there are a number of groups that will be significantly affected by these proposals and elaborate further in our response to the first question in the Social mobility and widening participation section. In addition we believe that institutions with less STEM focus, particularly those with high focus on the arts and humanities will be unequally impacted (in comparison to those with strong STEM focus) by these proposals.

Are there any equality impacts that we have not considered?

Impacts on mature students (from disadvantaged groups in particular but not exclusively); part-time students (see also the Social mobility and widening participation section).

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

How can information from the TEF be used to better inform student and employer decision making?

To do this, information has to be accurate and relevant. Crucially, it has to take account of what information students and employers actually use themselves when taking decisions, as opposed to information that government or universities think they do, or should, take account of.

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?

Our expectation is that the TEF should deliver effective parity and consistency for students and institutions right across the sector, and therefore there should be no exemptions.

Where relevant, should an approved Access Agreement be a prerequisite for a TEF award?

Yes.

Do you agree with the proposals on:

what would constitute a 'successful' QA review

Yes.

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

No. We believe that differentiated levels of TEF will need more detailed consideration and that moving to this in year two will therefore be problematic. We also anticipate that this will lead to significant changes in international reputation for British universities, with the potential to favour a smaller number of institutions and thus reduce choice and access to HE, particularly for disadvantaged groups nationally and internationally.

Do you agree with the proposed approach to TEF assessments?

While we have concerns about the TEF based on the information available at present, and noted throughout this response, should these be resolved then a system of application such as that described may be a positive one since institutions can weigh up the benefit of a higher TEF level against the financial cost to the institution of incurring it. Assessment panels should be independent from government and are positive because they allow for the evaluation of context in a way that quantitative metrics alone do not. There should be a pragmatic approach to panels that maintains as light touch regulation as possible while maintaining standards and reducing risks to students.

TEF can only be successful if currently relevant metrics are used which are valid and robust. Otherwise, confidence and credibility will be lost, thereby undermining any value of the TEF. At present, confidence and credibility are, in our view, unlikely to be developed since metrics such as student satisfaction, employment, retention are affected by a range of issues (including several out of the student, employer or institution's control such as family earnings or commitment) and do not easily predict one another. Furthermore, it is likely that the metrics used will change over time and therefore not ensure a common indicator across providers at any one time. Neither will they allow for clear planning by institutions if these metrics will be altered without suitable preparation time, ie. there is a sense that the goal posts could be shifted to the benefit of influential institutions and at the expense of others.

Learning gain during the period of study may be a better indicator than those suggested although technical consultation would need to focus on how to reliably measure learning gain to ensure that the credibility and confidence outlined above could be assured.

While we understand the importance of the CMA, we have concerns about the specification of the link between this and TEF. We also urge consideration of professional accreditation components that restrict the options available to universities in certain aspects of delivery (in our institution these affect primarily the Departments of Educational Studies, Psychology and Social, Therapeutic & Community Studies, as well as the Institute of Management Studies).

How can we minimise any administrative burdens on institutions?

Ensure that the processes set out are well informed and are of benefit to institutions, students and employers such that the measures really get at what they are intended to (eg student satisfaction scores as measured by the NSS have been shown not to be a good predictor of student performance in assessments and therefore shouldn't be seen as such), and that genuine long term learning takes place rather than teaching to tick the boxes.

Set up a system that ensures that the management and administration of the TEF does not take away experts' time from working with students to fulfil the purpose of their time at university, and does not enhance uniformity in order to ensure a good outcome in the TEF.

Ensure that lessons learned from other audits including those such as Ofsted and the HCPC are factored into the design of TEF. Their requirements also need to be considered to ensure that institutions are not penalised because requirements of relevant professional bodies conflict with requirements of the TEF.

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

No. While understanding that processes evolve over time, we have concerns about an evolving system. Institutions need to plan for a new system and for changes in the future with sufficient time and clarity. Governance and quality assurance processes have to be built into this planning and implementation cycle, requiring long planning periods. Lack of clarity at the outset and/or many changes carry high risk of poor implementation, lack of protection of students or providers, and will lead to less clarity for, and protection of those who should be protected.

The levels approach will allow students to compare institutions provided that the above concerns are addressed and that measures are comparable across disciplines so that students are comparing like with like.

In a consumer market differentiation of fees is inevitable. However we are concerned at the sustainability of even relatively small changes in fees for smaller institutions and those without the buffer of significant endowments or large numbers of STEM departments whose budgets are typically better able to withstand adjustments (eg NI, pension, QR changes currently and potential TEF related fee changes in the context of this consultation).

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

In a move to a single framework, it makes sense for all providers to be treated equivalently (see response to the question '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?', above).

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

No. We have concerns over any metric related to student outcomes. These have been proven to link strongly to quality of intake and thus courses and institutions where (eg) 90% of intake is from a state school and 32% from NS-SEC IV-VII will be disadvantaged compared to institutions which do not perform so well in this regard. As an institution in just such a position, we encourage the development of an approach that weights for this from the outset of TEF.

We are also concerned that TEF will encourage and allow some institutions to manipulate the system to the disadvantage of students, for example by increasing contact hours using low paid contract staff or increasing group sizes, by over recruiting rather than improving student experience, manipulating TRAC returns etc. Safeguards should be built into the process to ensure that this is not possible or that it can be identified and dealt with.

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?

As stated in answer to the questions on the proposed approach to TEF assessments and the focus on teaching quality, learning environment, student outcomes and learning gain, TEF can only be successful if currently relevant metrics are used which are valid and robust. Otherwise, confidence and credibility will be lost, thereby undermining any value of the TEF.

Similarly we have concerns about a metric based on time spent studying since a range of factors including family affluence and caring commitments will influence this. In institutions such as ours where large proportions of students come from widening participation backgrounds, and/or are mature students or students with caring responsibilities, we will be disadvantaged since a large proportion of our students are limited in the time they can spend studying by the amount of time they are forced to spend in paid work or other non-university related activities. If universities whose students are simply able to spend more time studying are allowed to increase fees, this may result in universities with a high proportion of students from more affluent backgrounds being allowed to raise fees disproportionately in relation to universities who support a greater widening participation cohort. Such an approach is likely to particularly favour high status institutions, already under fire for their lack of widening participation, where terms are short and intense and paid work is not allowed during term time.

From our point of view one of the most significant gaps in the Green Paper is the relevance of courses to self-employed graduates. Current metrics based on graduate destinations at 6 months (DLHE) do not recognise the often slow start-up time for the self-employed, including many in the creative industries but also in other professions. Many of our most successful 'creative' alumni would have failed on this metric but are world leaders later (eg Steve McQueen, Vivienne Westwood, Mary Quant) and many publically attribute their career successes to the ethos and teaching at our institution. Thus use of such a blunt tool is in our view wholly inappropriate, particularly when comparing STEM with non-STEM institutions. It would be destructive to any arts focused institution, as well as others. This, then, risks dividing the sector and also discouraging aspiration for the arts and humanities as a choice. This would be foolhardy not least since while arts and humanities graduates earn less than their STEM counterparts immediately after graduation, they have been shown to be considered to have more beneficial skills for management and analyses which tend to be the basis of jobs later in a career and thus some years after graduation they earn more. Put another way, in terms of any 'productivity' and/or the health of the UK economy it is clear that the creative economy is key. British art and culture is recognised internationally - and exported all over the world. We believe that the Green Paper threatens the kind of educational ethos that allows this kind of 'bottom-up' culture to emerge and develop by requiring institutions to gear their operations towards producing short-term measurable gains that will be captured by the TEF metrics eg immediate and high paid employment upon graduation. This militates against an entrepreneurial and start-up culture - the lifeblood of a creative, innovative economy - which takes time to establish new

products, ideas, and ways of working. Thus the TEF metrics are skewed in favour of an idea of education as training rather than a fully rounded liberal education, which develops creative and critical individuals and which has been shown to have its own long-term benefits for individuals and society.

Further consideration of this gap must be addressed, including consideration of a far longer-term view of an institution's graduates' employment successes.

A further gap in the Green Paper is consideration of the contribution of research-led teaching, a hallmark of our institution and many others. Although the incentivisation of teaching through TEF might be understood as an attempt to ensure that institutions do not prioritise research at the expense of teaching, the likely outcome of the TEF could be exactly the opposite, ie. at a time of decreasing funding for research through the dual support mechanism, the unintended consequences of the TEF may be the prioritisation of teaching at the expense of research. In a climate where research is worth less and less to institutions in simple monetary terms, it is important that institutions do not lose sight of the holistic picture of how research and teaching are interdependent. Teaching is good at Goldsmiths because it is research-led and informed by the cutting edge knowledge production in the process of development. Similarly involvement of students in research generates ideas and new directions as well as consolidates critical analysis and skills development taught in the formal classroom. Moreover, there are socioeconomic benefits of this interdependency to both students' learning and the public good more generally.

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

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

While we agree that there should be continued effort to improve access and success in HE for all from disadvantaged backgrounds, we believe that the comparators that are proposed are likely to limit choice, making those least likely to engage with HE (especially but not exclusively) more likely to be forced down certain educational routes rather than having the same choices as those from other backgrounds. We also doubt that name blind applications will a make significant improvement to access to HE for BME students, particularly in disciplines and interviews that rely strongly on interviewing. We believe greater attention should be paid to alternative methods of increasing access to HE in such groups.

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

No. There are significant local and discipline variations related to social mobility and providers are best placed to understand these.

What other groups or measures should the Government consider?

Changes to DSA and implications of the Equality Act; role of primary and secondary schools; removal of entry to specific university/mission groups as a metric of success when assessing secondary schools/ sixth form colleges; older students from disadvantaged groups; mature students; part-time students.

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

The reality of access to education for these groups should be clarified and can then be better addressed to ensure fair access.

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

Additional staff with expertise to (i) generate the data, (ii) understand and work with such data; administration of the process including the data gathering and additional contextual information that may be provided; administrative burden of tracking the increased processes needed and increased costs associated with these, and then sourcing additional income to pay for this; increased bursaries and support for students to ensure that the very students who should be being given fairer access to

education are those who gain access to it. These additions in the light of increasing fees in line with inflation may not be cost effective for an institution, thus undermining the principles of the TEF. As a result they may drive standards down, rather than up. We have strong concerns about this risk.

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

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

Our primary concern is that all providers are treated similarly and are required to meet the same criteria in order to protect their students and staff. There are substantial risks to student experience and social mobility if the rules allow providers into the market with limited financial backing or expertise in the business of HE/student experience.

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

In order to ensure standards and protect students, it is our view that validating bodies need to be expert in degree provision to ensure quality and student experience, we would also argue that they should generally have a strong record in widening participation since this is often a key experience of the students on validated programmes.

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

We have concerns about the speeding up of entry of new providers as this gives less time to establish a provider well and highlight sustainability, thus presenting significant risk to students, taxpayers and government.

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

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?

Where a student will fail to be able to complete his/her degree for reasons linked to problems in the institution, solutions should be offered.

There are significant risks particularly with new providers and we anticipate the risk of new provider failure would increase under the system proposed. This would have a high negative impact on the students at that provider, or who had graduated from it. What protection will there be in these cases? What are the progression, retention and employment rates for new providers to date? Do these provide strong evidence that the proposed changes are sensible and protect students?

The question of insolvency in an institution does not yet appear to have been considered and may be the biggest risk. There must be a robust independent process for provider exit that allows the provider and its students to respond and plan for the future.

Simplifying the higher education architecture (Part C)

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

There may be some advantages to dealing with a smaller number of organisations. However there is a good deal more to ensure within HE than students per se and it is unclear whether the focus of an OfS can deal with this.

If an OfS will contract out services, then there is an arguable distinction between the current and future situation assuming that they will contract out services that currently exist elsewhere.

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

Partially. This would mirror the existing system and may be simply a change of name rather than a different system. It would be important to clarify the relationship between the OfS and these other bodies.

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

We consider it could be appropriate to contract out the work of the QAA.

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

Of the two options, we prefer option 2 (BIS Minister sets strategic priorities and allocation responsibilities divested to OfS) as it should ensure that there are more checks and balances in the system since the allocation is a little further removed from the political machine. Also we believe that it would offer greater protection for institutions such as ours where an arts and humanities focus puts us some way down the list of political priorities for education, I think we can only stand to benefit from a framework that has strong safeguards in place.

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

Regulation should follow the same framework for all providers.

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

We value strongly the relationship between our institution and our Students' Union (SU). We recognise the importance of its separation from the university in order to ensure the student voice, democracy and aspects of welfare support. We believe that a SU should operate in a transparent way for, and be accountable to its members (ie students) and can work in close partnership with an institution without contravening these principles.

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

While we agree that students should be placed at the heart of their university experience and for many institutions (including our own) student fee income is the primary funding stream (since research, consultancy, donations are not sufficient), there is much more that a university offers to society including social benefits such as community training and employment, research and commercial collaborations, innovation and economic growth. Furthermore, universities are substantial employers and therefore a focus only on students is likely to be counterproductive. There is, therefore, significant public responsibility that includes but is not confined to students.

Do you agree with the proposed subscription funding model?

Not sure. Subscriptions will be an additional cost burden for institutions and will have a particularly negative impact on smaller institutions such as ours. We also have concerns over the implications of member subscriptions for independence.

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

We have concerns about the consumerisation of HE and a risk of increasing the number of students who do not graduate with the skills needed in the graduate employment market. In addition, with the entire focus of the OfS being on students, which body will work to protect the institutions and other aspects of HE provision that falls somewhat outside of the student experience, if appropriate?

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

Clear guidance about when and how these powers can be used with providers having total confidence that they will only be used in particular situations; providers must be able to provide a considered response to any concerns as part of the process.

Do you agree with the proposed deregulatory measures?

We believe that all providers should be subject to the same requirements.

Reducing complexity and bureaucracy in research funding (Part D)

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?

Having a strong arts, humanities and social sciences focus, we are concerned by the significant reductions in funding for research in these areas given their benefits for the UK economy, while the science budget is ring fenced.

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

We believe that it is important that QR and research grant income are kept separate, as they should be used for different purposes. Unless an institution has a very large research base, it cannot sustain research activity on competitively won grants alone. A clear pot of QR money that can be badged as a fund for sustaining and developing the underlying research base allows in arts, humanities and even much of the social sciences to be continued in the UK, where research grant possibilities in these disciplines are relatively sparse. Without such funds, the UK's significant standing in these fields, not least within the creative industries, internationally will be lost.

As an Arts and Humanities institution some way down the list of political priorities for education, we believe that we can only stand to benefit from a framework that has strong safeguards in place to protect us from being unable to fulfil our duties when funding bodies reallocate funds.

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 REF allows universities to curate their research in specific ways in order for it to be peer-reviewed by other academics. We believe that this is still the most reliable way of ensuring access to quality accessing research and ensuring research excellence. We believe that any move to a metrics-based version would reduce such accessibility.

Peer review enables the following which is not always possible using any kind of metric: identifying excellence in research across all disciplines and in diverse formats (including contributions to the UK's creative industries and design), identifying where HEIs have a unique position in developing the most innovative ideas, identifying outstanding work across all types of institution, allowing newcomers rather than maintaining the status quo; and encouraging engagement with the wider public as evidenced in the outstanding success of impact studies across a very wide range of fields.

We also note that citation practice differs in much of the arts and humanities to STEM and in most Practice Research it does not exist in the same way at all.

We believe that the benefits of REF can be preserved by not allowing a one size fits all to assessing quality and ensuring the money available to arts, humanities and social science is ring-fenced.

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

Outputs: reduction in burden could only occur by reducing peer review. We anticipate that this would lead to a lesser degree of differentiation among the top HEIs.

Environment and impact statements: these could be standardised in the requirements, which would have some disadvantages, but could help make the assessment less subject to the vagaries of skills in English language writing. Producing research environment statements that are fluent and cohesive takes a great deal of work and collaborative effort across departments who are part of the same Unit of Assessment. Whilst the production of an environment narrative is a valuable exercise in a well-funded sector - the statements in most REF environment submissions could be more simply assessed by using research income figures, staff development opportunities and successes, specific esteem measures and PhD completion rates, for example.

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

- Increased interoperability between various output systems such as ResearchFish with repository systems such as ePrints, PURE and/or other data repository systems.
- Creation of additional national data repositories such as UK Data archive managed by research data management and technical experts to reduce burden and need for in-house expertise at Universities.
- Additional funding allocation to support development of good data management infrastructures at local level. This will support smaller institutions and those with a greater focus on non STEM vs STEM in Fulfilling our Potential: Teaching Excellence, Social Mobility and Student Choice implementing and maintaining the good research data management infrastructures required.
- Further investment in JISC and other initiatives that promote the sharing and development of good research data management practice and seek to explore infrastructural improvements.
- Further investment in JANET and a potential dropbox-like function that will allow for the safe sharing of research data using EU and UK law.
- Further investment into research exploring legal and ethical frameworks related to the use and sharing of Big Data and how this relates to infrastructure, security, data protection, encryption, copyright, IP and the economy.