Goldsmit
UNIVERSITY OF LONDON

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

Professor Elisabeth Hill

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

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 di□erentiated 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,

Do you agree with the proposed approach to incentives for the di□erent 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

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

To what extent should the O□ice 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.

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.