



University of Leeds: Response to the 2015 Higher Education Green Paper 'Fulfilling our Potential'

Introduction

1. The University of Leeds received its Royal Charter in 1904 and is now one of the largest universities in the UK. We are a world top 100 university with a global reputation for excellence in student education and research.
2. The University welcomes the core aims of the Government's 2015 Higher Education Green Paper: to raise teaching standards, provide greater focus on graduate employability, widen participation in higher education, and to open up the sector to new high-quality entrants. We are actively addressing the first three of these aims as part of our ongoing commitment to students, present and future.
3. The University also welcomes the principle that equal weight should be given to education and research. We believe that it is essential to excel in both areas of the University's core purpose – the generation, translation and application of new knowledge and the education of a wide range of undergraduate and postgraduate learners, equipping them with the knowledge, skills and values for future success.
4. Higher education and research must exist in symbiosis rather than in tension or competition. It is the responsibility of Government and University leaders to create the conditions for this by ensuring the alignment and coherence of policy, setting clear goals for continuous improvement and putting supportive organisational arrangements in place, including a single oversight body for universities in England.
5. The Government's reforms of higher education introduced in 2012 require legislation to protect the interests of students, taxpayers and universities and the proposals set out in the Green Paper – when finally resolved – will probably require additional legislative change. Indeed it is the failure to legislate for a coherent and uniform regulatory framework in higher education that has frustrated new market entrants, and left the Government exposed to weaknesses in accountability for the proper stewardship of public funds.
6. Universities require medium and long term stability to provide continuity for students. New legislation in higher education is a rare event and current statutes, principally the Further & Higher Education Act 1992, have worked well for almost 25 years. The principles, checks and balances enshrined in the current statutes have contributed to

the development of a world leading higher education sector and provide important lessons for the future.

7. The Government's commitment to teaching excellence; its re-stated commitment to university autonomy and academic freedom, the dual support system and the 'Haldane Principle'; and the requirement for the criteria and processes for achieving university title and university college title to be stringent and rigorous, are all matters which should be reflected clearly in new legislation. This will secure the international reputation of UK universities and provide the conditions for their future development.
8. The University of Leeds supports the broad sweep of the responses to the Green Paper submitted by the Russell Group and Universities UK. Rather than repeat these arguments, we have restricted our institutional response to a small number of key points.

Teaching Excellence, Quality and Social Mobility

9. We welcome the principles underpinning the introduction of a Teaching Excellence Framework (TEF), including recognition of the complexity of the current proposals and the need to take account of different institutional missions. As noted in paragraph 15 of the Green Paper, teaching excellence must incorporate and reflect diversity, be the sum of many factors and chime with the varying perceptions of students, universities and employers. The development of a framework which respects these differences must not be rushed and, given the strong commitment of universities to the development and dissemination of innovative teaching practices and the continuous improvement of quality and standards, it has to be proportionate.
10. The introduction of the TEF should be seen as a mechanism for enhancing teaching excellence in universities and building on the international reputation of UK higher education. The proposals for using existing metrics as proxies for measuring quality need further detailed discussion and contextualisation whilst the measurement of 'learning gain' is in its infancy and should not be used until robust methodologies have been developed.
11. The proposal to use a '4 point' differentiated scale is also premature. There is no credible methodological basis for doing this in the short term and the University supports a model of co-development where universities and policy makers can work together to develop and test the new arrangements over time.
12. The University does not support a link between the outcomes of the TEF and the ability to charge higher fees. The notion that teaching excellence is driven by increasing income misjudges the importance of partnership working and trust between universities and their students – students have a right to high quality education in every institution trusted with university title. Future fee levels and the overall balance of private and public investment in higher education is a matter of

wider public interest which needs to take account of a range of factors including the benefits of higher education to individual students and society as a whole, and the Government's understanding of universities as a driver for innovation and economic growth.

13. The University welcomes the commitment of the Government to widening participation as a driver of social mobility. We have a proud record of widening access and participation in Leeds and invest a great deal in spotting talent early, and boosting the aspirations, attainment and achievement of students. Whilst acknowledging the overall target for improvement and the need to make progress in raising the participation rate for disadvantaged young people from black and minority ethnic groups and young white males, we suggest that precise targets for each institution need to be nuanced to take account of local circumstances. We accept that work to improve access and success should have links to the TEF and would be happy to engage in discussion with policy makers and sector interests to determine how this might be achieved. We also agree that the functions of OFFA should be incorporated in the work of a single oversight body.

The higher education sector

14. In the past four years, universities have been implementing a new funding settlement based on large scale substitution of public funding for teaching by loan funding to cover substantial increases in student fees – a process which carries significant risks for students, taxpayers and universities. These risks have been mitigated but a decision to replace maintenance grants with loans would place an additional heavy burden on students whilst the further expansion of the student loan book – to accommodate additional student numbers, loans for postgraduate students and a shift away from NHS bursaries - would increase the long term risks for taxpayers.
15. The essence of the changes made in 2012 were quite simple, but fundamental. The Government's position is that we have a world class higher education system, derived from a progressively reformed 'public-private' funding mix. The imperative for change was based on questions of affordability to the state, benefits to individual students and the need for greater (market) dynamism to drive up quality and performance. The Green Paper builds on this, envisaging a wider range of higher education providers to stimulate competition and innovation. Whilst recognising the potential benefits of greater pluralism and supporting a level playing field for all providers, the university urges the Government to open the sector only to high-quality entrants with the financial resilience to assure the interests of students and achieve long term academic success.
16. University title is prestigious, desirable and valuable. The criteria and process for obtaining university title need to be stringent and rigorous and they should be designed to protect the interests of students, the wider public and the strong international reputation of the UK higher education sector.

17. The University agrees that the current arrangements are uneven and need to be set out clearly in legislation, establishing a single route for new entrants into higher education and taking full account of the following regulatory building blocks: academic standards and quality; access and participation; transparency and provision of information; student complaints and redress; and questions of financial sustainability and good governance.
18. The University also believes that if the Government wishes to give equal weight to education and research, consideration should be given to linking the award of university title to the achievement of taught degree awarding powers and research degree awarding powers. The Government should certainly not dilute the current criteria for the award of university title and it should maintain the use of university college title where appropriate.

Simplifying the higher education architecture

19. The symbiotic development of higher education, research and innovation is central to the work of universities, and to the Government's drive to establish universities as engines for economic growth and social and cultural development. The cutting edge of teaching excellence is based on research led education and embraces research based learning, broadening the intellectual horizons of students and encouraging enquiry, discovery and achievement. The continuum of undergraduate education, masters programmes and PhD education, training and development is crucial to industry's requirement for the highest level skills and the long term development of academia.
20. Against this background, the proposals in the Green Paper to split the regulation, funding and oversight of higher education and research – possibly between multiple organisations – would fragment and overcomplicate the engagement between Government and universities and risk an unnecessary division between education and research at national level.
21. The allocation of the block grant from HEFCE – guided by Ministerial priorities – has allowed universities to operate flexibly in a highly competitive global sector enabling a coherent approach to improvement in undergraduate and postgraduate education, research and innovation. Whilst recognising that grant funding for student education has reduced, important strands of funding for high cost subjects, STEM, student opportunity and specialist institutions remain alongside quality-related research funding. There is a proven 'whole-system' approach to regulation, funding and oversight in place which serves the mutual interests of students and universities extremely well.
22. The proposals in the Green Paper are likely to result in a loss of understanding of cross institution perspectives at a national level, a greater administrative and regulatory burden, higher transaction costs, and the leakage of expert staff who are trusted by students, universities, the research community and Government. The

case for separating research assessment and quality related research funding, teaching funding and the statutory responsibility for quality and standards, and the proposed activity of the Office for Students is not made in the Green Paper and we do not support the proposed changes. We favour a single oversight body for all aspects of university activity with a strong emphasis on securing the interests of students.

Reducing complexity and bureaucracy in research funding

23. The University welcomes the commitment of the Government and the Nurse Review to the dual support system and suggests that this should be reflected in legislation. Quality-related research funding enables universities to maintain a dynamic and responsive research base, providing much needed flexibility to: invest quickly in new strategic priorities; support partnerships with research users; sustain key research groups between funding for specific projects; encourage interdisciplinary programmes; invest in infrastructure and equipment; and to support a vibrant PhD and post-doctoral community.
24. Research Councils are also highly valued by the academic community in our University and it is imperative that their independence, budget stability across medium and long horizons and ability to employ staff and operate their own facilities is not disrupted or damaged. Consistent external analysis demonstrates how research funded through the dual support system delivers world leading outputs and impact.
25. The plurality of funding for university based research – from public and many other sources including the European Union – is a major strength in the UK. The dual support mechanism is arguably the single most important factor in ensuring that publicly funded research is more efficient than any other country. The Government, the Research Councils, the HEFCE research team and a range of other research funders work extremely well together and the University does not favour organisational change which would combine the two distinct elements of the dual support system under the stewardship of a single research organisation.

Conclusion

26. The core aims of the Green Paper set out in paragraph 2 (above) are supported by the University. To deliver these aims in the interests of students whilst securing the sustainability and long term success of universities requires: a determined programme of change; a well-judged approach to legislation; and a carefully aligned set of policies which meet the needs and aspirations of students, the taxpayer's requirement for excellent education and research outcomes at reasonable cost, and a diverse range of universities which are academically and financially sustainable.

The University would be happy to work with policy makers to achieve progress in each of these areas.

27. However, we cannot support an overly mechanistic or instrumental approach to the development of the TEF or a programme of unnecessary organisational upheaval which fractures the symbiotic relationship between student education and research and innovation or disrupts the successful operation of the dual support system. Changes of this nature will only drain energy and purpose from the higher education sector when our focus should be on improving international competitiveness, the further enhancement of our reputation for excellence in education and research, and our ability to play a pivotal role in achieving economic growth.

University of Leeds
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