



ROYAL
HISTORICAL
SOCIETY

14 January 2016

**THE ROYAL HISTORICAL SOCIETY'S
response to the Government Green Paper, 'Fulfilling our Potential:
Teaching Excellence, Social Mobility and Student Choice.'**

*endorsed by The Economic History Society, History UK, the British Agricultural
History Society, and the East Midlands Centre for History Teaching and Learning*

Public sector equality duty

Question 1:

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

Our discipline (History) faces a continual challenge in widening participation at all levels of study. As the Green Paper concedes (Annex A, 19), some 'protected groups' might be more price sensitive than others, and this may increase the barriers to participation in 'Peer Group A and B' institutions, which happen to be where most undergraduate history teaching takes place. The only way of mitigating this will be to embed very strong incentives to widen participation in the TEF, especially since some of the proposed metrics (for example graduate earnings) are likely to have the perverse effect of incentivising participation from already over-represented groups.

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

Yes **No** **Not sure**

Insofar as the proposed TEF draws on NSS data, there is the possibility that it might have a negative effect on gender equality among teaching staff in HEIs. Studies (e.g. MacNeil, Driscoll & Hunt, *Innovative Higher Education*, 2015) have shown that respondents consistently score male teachers higher than female teachers.

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 Royal Historical Society would like to see genuine incentives for HEIs to concentrate on teaching quality. Therefore, we would suggest that if the government introduces a TEF it should be one that encourages institutions to:

- create a culture in which pedagogy is valued, developed, and discussed among all members of academic staff, and quality teaching rewarded
- create programmes that are consciously designed to develop in students particular sets of intellectual (and, where appropriate, practical) skills
- recognise and develop the intrinsic relationship between research and teaching

We believe that to achieve these goals, the TEF must:

- recognise and value the whole educational experience of students – i.e. *learning* as well as teaching
- be based on programme-level (discipline specific) submissions
- be peer reviewed by respected academics in the same discipline, in much the same way as happens with the REF
- require submissions that will be largely narrative, rather than metrics-based

We can see the value in aiding student choice of appropriately benchmarked metrics, but (see our answer to Q. 11) we do not think they could ever be an effective proxy for teaching quality and doubt that they could form the basis of reliable comparison across institutions or disciplines. It is one thing to seek to make information about teaching even more available and transparent to potential students and quite another to impose a target-led regulatory regime on HEIs, with all the well-known problems that will engender. Since the removal of the recruitment cap on undergraduate numbers, universities have noticeably been focusing more on teaching quality than was previously the case. The test of these proposals is whether it will enhance that tendency or retard it.

The Royal Historical Society's case is that the only meaningful assessment of teaching quality is one that is rooted in the discipline-specific experience and judgement of those who participate in teaching and learning – the teachers as well as the students. As the Green Paper concedes, it is palpably not up to the government to define what makes for effective teaching at HE level. It must therefore be up to teachers to determine how best to teach in their discipline at this level, within the resource constraints we face.

Our Learned Society takes a lead in shaping and defining what effective teaching and learning means in our discipline. We have contributed to the definition of subject-specific benchmarks, including for the recent review of the QAA's History benchmark statement, which was co-chaired by our Vice President. In History, students benefit from teachers with high expectations. Specifically, this means students having access to intensive, small-group teaching from research-active and effective teachers. It also means that students are required to write frequently and regularly and are expected to spend relatively large amounts of time doing independent study and research. We are confident – on the basis of evidence – that a good history programme prepares students very effectively for

the workplace, but we are certain that effective learning and teaching in History is not measurable by generic cross-disciplinary standards.

We believe that teaching should not only be ‘research-led’ in the sense of relating to the research interests and expertise of teaching staff but should also be research-based in the sense that a good education at university should also be about students developing research skills and engaging in research. Ofqual’s 2012 report, ‘International Comparisons in Senior Secondary Assessment’, found that ‘some of the most demanding elements of qualifications worldwide included independent projects and sustained study tasks’ and that History qualifications requiring self-directed research were both ‘innovative’ and ‘particularly demanding’. These are precisely the qualities for which History teaching at UK HEIs has become internationally known, both for their educational value and for their cultivation of desirable analytical and characterological skills in the workplace, and any assessment of teaching must properly acknowledge and reward them.

Question 3: Do you agree that the ambition for TEF should be that it is open to all HE providers, all disciplines, all modes of delivery and all levels?

Yes. In principle, the challenge of capturing the many meanings of ‘excellence’ are, so far as we can see, no greater if applied to the entire sector including postgraduate taught courses than it is within the more restricted scope of the initial phase.

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?

Yes. Unless Access Agreements – together with evidence of progress toward achieving the goals set out in them -- are a prerequisite for a TEF award, it is difficult to see what incentive HEIs would have for maintaining or extending the numbers of students from under-represented groups, especially as in other respects the TEF might incentivise recruitment from over-represented groups (see below).

The Royal Historical Society is strongly supportive of efforts to ensure that class and ethnicity are not barriers to a good historical education with all the benefits that brings. We believe that Access Agreements should be framed in such a way that Institutions have to demonstrate efforts to recruit students from under-represented groups in *all* disciplines, and that they should also require institutions to work with schools and other organisations to tackle these issues.

Question 5: Do you agree with the proposals on: what would constitute a ‘successful’ QA review

Yes No Not sure

This depends on where a given institution is in the current QA cycle.

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

Yes No Not sure

The proposed incentives for this first year are negligible but they will also be provisional.

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

Yes No Not sure

Please give reasons for your answer.

We would prefer to see a slower phasing in of the higher levels of the TEF. On this timetable it is difficult to see how an application can be based on anything other than the ability of senior managers to present data in a convincing way. The work that will be needed to demonstrate teaching excellence at disciplinary level will take longer. It is in any case very hard to judge how long it will take to phase in clearly differentiated levels of teaching quality pending the 'technical consultation' in 2016 which will in effect decide all the crucial issues of 'criteria, process and outcomes' and 'evidence'.

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

Timing?

Yes No Not sure

Assessment panels?

Yes No Not sure

We strongly favour the idea of establishing *discipline-specific* panels since the meaning of 'excellence' will vary so much from discipline to discipline. We also think that moderation of disciplinary panels and the data incorporated into a published TEF judgement will need to be very different for arts and humanities subjects than for sciences. Typically, humanities programmes will feature fewer contact hours than most science programmes, but will also feature much more small group teaching, a far greater emphasis on independent learning, and more concentration on the development of students' writing and communication skills. There will be very different kinds of links with outside institutions and the nature of 'employability' will necessarily be different in a subject like ours than in some other disciplines. The QAA has already recognised this in establishing discipline-specific panels in order to draw up disciplinary benchmark standards.

and process?

Yes No Not sure

Until we have more detail about what the TEF will measure and how it will work, we find it impossible to answer this question.

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.

This is a serious question, obviously so in light of the long, agonized debates over the administrative burdens imposed by REF, and now the Stern Review which you have recently commissioned. The government must be mindful that whereas the REF is a means of distributing significant amounts of public money, the proposed TEF serves no such purpose and so the benefit to universities will be much harder to balance against the cost. As the government withdraws from direct public subsidy of teaching it must recognise that its regulatory role necessarily changes too. While the government can seek to give more leverage to students, since it is they who are now ultimately paying, it has ceded any direct leverage it may theoretically have had over how HEIs deliver teaching.

Furthermore, the danger of an 'administrative burden' is not just about workload but also about the relationship between university teachers and managers. The precedent of the REF, where many of the distortions to academic effort have come from HEIs' (mis)interpretation of the rules, is ominous in this respect. On this precedent one might expect university managers to be unnecessarily and distractingly interventionist not in ways that encourage diversity and experiment in teaching but rather in ways that are thought to mirror government 'intentions'. It would be one of the most depressing unintended consequences of the TEF, albeit one very easy to imagine, if the regulatory constraints under which university teachers worked, stifling innovation and creativity, outweighed putative benefits in enhancing teaching quality.

Therefore, the TEF should not, indeed in our view *cannot*, impose measures that, however subtly or unintentionally, have the effect of directly engineering how teaching and learning happens in universities, whether that is through crude measures like 'contact hours' or anything else.

We are concerned that the Green Paper seems to pose a Hobson's Choice between, on the one hand, metrics, which are cheap to administer but subject to serious methodological objections and susceptible to perverse outcomes – or, on the other hand, peer-review, which would be more likely to capture something meaningful but brings with it a potentially onerous workload.

The considerable cost of peer-review will be worthwhile only if the results are credible within the sector, and genuinely useful to academic colleagues as well as providing additional information to potential students. This can only be so if the process places teachers at its heart and takes into account both disciplinary distinctiveness and the depth and range of expertise about teaching and learning that already exists in universities.

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

Broadly, yes. We support a discipline-level approach, so long as there are discipline-specific criteria and participation by teachers in formulating them. There will be no utility in a league table of differentiated TEF levels unless what the TEF is measuring is valid, meaningful and comparable across institutions, and we cannot judge that before the 'technical consultation' is complete.

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

Yes No Not sure

Under current conditions the financial incentives are minuscule if they are to be no more than inflation-level fees rises. It is difficult to see how such a small increase in income could possibly compensate for the internal staff costs of engaging in the exercise never mind provide any additional income. Reputational incentives may be considerable, but only if the process is seen as credible.

We have no view on the incentives for alternative providers.

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

Yes No Not sure

These are perfectly reasonable headings that provide the basis for a discussion about what makes effective teaching, but it is not clear how the evidence that institutions will provide about this might be measured and compared. We believe that, at least in the case of History, it can only be done by disciplinary specialists who understand the nature of teaching and learning in humanities education. Even so, there remain serious difficulties in making comparative evaluations between, for example, full-time and part-time, young and mature participants, and between students from different backgrounds, as we discuss further below.

Question 11: Do you agree with the proposed approach to the evidence used to make TEF assessments - common metrics derived from the national databases supported by evidence from the provider?

Yes No Not sure

We are pleased that the Green Paper acknowledges the difficulties of using metrics. We believe that the conclusions of Prof James Wilsdon's review of the use of metrics in research assessment for HEFCE, *The Metric Tide*, apply with even greater force to teaching and learning.

Of the three types of common metrics mentioned in A.3.12 we think by far the most problematic is the first: the destination of graduates. The difficulty here, even in the (presumably) more nuanced and reliable form of HMRC data matching, is that employment status and earnings are not related in any demonstrable or tangible way to teaching quality but reflect other factors

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including social class, the perceived status of the university attended, and secondary school type, as well as career choice. While it may be of some value to students to have this information, it should not be confused with a mechanism designed to drive up teaching quality.

In addition, the use of such metrics, if they do not control for social origin, may have the perverse effect of incentivising socially selective admissions. There is evidence that employers use university type and sometimes subject choice as screening mechanisms to select socially-desired students rather than economically-desired skills. Wakeling and Savage (Sociological Review 2015), consistent with many other studies, find a strong effect of parental background in graduate destinations, independent of education. Research for BIS (Walker and Zhu 2013, BIS Research Paper 2013) concluded that 'we are a long way from being able to draw policy conclusions' from subject-specific graduate premia and 'it would be inappropriate, for example, to conclude that there was a shortage of one type of graduate relative to another.'

We are sure you agree that government policy should not end up, however unintentionally, encouraging university admissions officers to have to weigh up the likely earning potential of applicants, something which would be dishearteningly easy for them to do using school and postcode data.

Even where it is possible to control for some of these background factors, the demonstrable tendency of employers to use institutional reputation as a 'screening' mechanism in employment decisions suggests that a TEF based in any substantial degree on graduate earnings may only have the effect of fossilizing established hierarchies rather than inciting innovation and improvement.

Retention figures are of relevance but only *so long as* they are properly benchmarked against the background of the student body, since otherwise this would be a disincentive for institutions to recruit students from under-represented groups, including part-time and mature students, for whom the funding situation has already been deteriorating markedly in recent years.

Student satisfaction data is potentially of value, but again only so long as it is properly benchmarked. But, to state the obvious, a measure of student satisfaction is not a measure of teaching quality. Learning *should* be difficult and should require commitment on the part of the learner, and rigorous assessment means that by definition not everyone will succeed. These self-evident observations severely limit the ability of 'satisfaction' measures to capture teaching quality.

Of the metrics mentioned for later implementation in A.3.14 we would strongly welcome a measure of the proportion of staff on permanent contracts. We would also urge that universities be incentivised to embed the relationship between research and teaching by being penalised for employing staff on teaching-only contracts. The distinctiveness of HE, and one of UK universities' internationally recognised great strengths, is that students are taught by people who are also

actively engaged in research. In our discipline (and no doubt in others) effective teaching cannot be divorced from research: we want to develop students who are engaged in research themselves and who are exposed to the people who are immersed in scholarship.

'Teaching intensity' is not clearly defined in the Green Paper, but in our discipline we believe it should mean levels of student engagement (i.e. evidence that students are actively participating in learning), insofar as that can be reduced to a metric. We are convinced of the value in our discipline of small group teaching and/or low staff/student ratios as a means to this end and believe that this is vastly more important than the number of contact hours. In our experience, drawn from across the spectrum of institutions teaching History, students consistently appreciate the individual attention and higher quality feedback that is only possible in a small-group setting.

We also believe that there is a very specific role for a Learned Society like ours in helping to define and shape what excellent teaching and learning means in our discipline. We therefore welcome the suggestion in A.3.17 that Learned Societies are among the 'stakeholders' with whom institutions would want to work. The RHS is already well positioned to play this role, being able to draw on a depth and range of expertise from many different institutions.

On the whole, however, we suspect that the idea that metrics which may not be 'robust' can or should be 'balanced' with 'institutional evidence' is likely to lead to greater managerial attention to the former (which can be automated and rendered generic) than the latter (which relies on costly subject-specific and qualitative measures). Like other performance indicators this runs the risk of transferring institutions' efforts from performance to indicator.

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

Question 12:

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**

This is a vital issue and a very difficult one to tackle effectively. We are pleased that in England there is evidence that the most disadvantaged are very slightly more likely to benefit from access to HE than was the case a few years ago, but the data suggests a rather less rosy picture than is implied by the Green Paper. For example, while it is true that 'young people from the most disadvantaged areas were 40% more likely to enter higher tariff institutions than three years earlier', this statistic suffers from the common 'base/rate problem', in that the participation of these young people rose only from 2.3 to 3.2% (i.e. a 40% rise from a very low base), while in fact participation rates for more advantaged young people were still rising more rapidly in absolute terms over the same period.

We point this out only to warn against complacency about the ease with which students from disadvantaged backgrounds might be introduced to ‘access and success’, relative to students from advantaged backgrounds.

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

There are few more important issues for universities, or the education system and society more widely, than ensuring fair access. Therefore we believe the government should use all available policy levers to ensure that universities make strenuous efforts in this area.

However, we do not support *externally imposed* institution-level admissions targets for under-represented groups.

The challenge for HEIs and for us as a Learned Society is to work with schools and other organisations to increase participation and academic success among under-represented groups at all stages of the education system.

The challenge for government is to discriminate between those levers that can be pulled at the point of admission to university and those that can't. It would be a mistake to place more policy emphasis on one specific stage than it can bear, and which would therefore be likely to incentivise game playing and produce perverse effects.

As the Green Paper points out, ‘prior educational attainment is the key factor in determining progression’. Disadvantage starts in infancy and deepens (unevenly) at different stages of the life course. Government policy on social mobility needs to link up communities, child-care, child support, schools, universities, careers, equal-employment policies and income inequality. Research commissioned by BIS in 2011 recommended a focus on other elements of the ‘skill/deprivation distribution’, especially boosting achievement at 16-18 where the socio-economic gaps are widest (Claire Crawford, Paul Johnson, Steve Machin and Anna Vignoles, ‘Social Mobility: A Literature Review’, BIS, March 2011).

What other groups or measures should the Government consider?

At the moment the Office for Fair Access has a ‘nuclear option’ of preventing universities from charging maximum fees. But in our observation, university managers do not believe OFFA will press the nuclear button and so this option on its own has no discernible deterrent effect. An effective regulatory regime would give the Office for Students a range of powers short of a ‘nuclear option’ that would hold HEIs to account for progress towards their Access Agreements.

Question 13:

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

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Key to a successful widening participation policy is giving universities the ability to identify applicants who have demonstrated their intellectual ability while overcoming measurable disadvantages. Properly contextualised decisions about academic potential can only be made on the basis of as much data, about social class, ethnicity and school as possible. Therefore we support greater access to the kind of information currently held by UCAS.

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

We are unable to comment on this.

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

Question 14: Do you agree with the proposed single route into the higher education sector?

Yes No Not sure

Please give reasons for your answer, including information quantifying how the potential cost of entry would change as a result of these proposals.

We think that the issues raised in this and the following two questions are outside our remit as a Learned Society.

Question 15:

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

Yes No Not sure

Please give reasons for your answer.

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

Question 16: Do you agree with the proposed immediate actions intended to speed up entry?

Yes No Not sure

Please give reasons for your answer.

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?

Broadly, yes. But we also think that there is an important component largely missing from the Green Paper's discussion of market exit: how to facilitate students transferring, during their degree programme, from one institution to another. Although there is now a rudimentary system of credit transfers that in theory allows students to move from one HEI to another without losing credit, in practice institutions often place barriers in the way. Incentivising universities to facilitate the transfer of students from a programme in one institution to a programme in another would create more fluidity in the market.

Naturally, it would also require an HE system that had robust mechanisms for ensuring peer-reviewed validation of programmes and the reinforcing of broad comparability among programmes through the external examining process.

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Simplifying the higher education architecture (Part C)

Question 18:

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

Yes No Not sure

We agree that the higher education architecture is unnecessarily complex, but this is in large part because as government withdraws from direct administration it leaves behind complex regulatory frameworks. SLC, OFFA, QAA, HEA and HESA are all relatively recent products of this regulatory policy. OfS would be yet another one.

Not all of HEFCE's current functions are appropriate for an 'Office for Students'. Hiving off its research functions will, according to the Nurse Review, require a further complication of the research support structure. In addition to assessment and allocation of QR, HEFCE provides essential core funding to research institutes (such as the Institute of Historical Research, as part of the School of Advanced Study of the University of London, which provides crucial infrastructural support for our discipline). These research functions – not provided for in the rationale for government intervention in HE on p. 58 – are crucial and not easily separable from 'education'. For example, it is not clear from the Green Paper proposals where responsibility for PGT and PGR students will lie.

We would favour retention and indeed strengthening of a single higher-education regulator, such as the funding councils provide, with if anything transfer to it of some of the functions of the other, smaller quangos targeted for supersession.

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

Option 1: BIS Ministers set strategic priorities and BIS officials determine formula.

Agree Disagree Not sure

Option 2: BIS Minister sets strategic priorities and allocation responsibilities divested to OfS

Agree Disagree Not sure

Although little teaching grant remains for humanities disciplines such as ours, we are concerned about the proposal to allocate teaching grant from within BIS to 'enable ministers to strengthen incentives for higher education provision that supports the needs of the economy'. This seems to suggest a degree of 'manpower planning' which governments have largely abjured since the 1960s and which is inconsistent with an HE system centred on students and student demand. It points to features of the Australian system, including differential fees and subject quotas, which have been heavily criticised by students and

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employers for unbalancing the normal functioning of supply and demand mechanisms.

Clause 68(3) of the Further and Higher Education Act 1992, still in force, provides that 'Such terms and conditions may not be framed by reference to particular courses of study or programmes of research (including the contents of such courses or programmes and the manner in which they are taught, supervised or assessed) or to the criteria for the selection and appointment of academic staff and for the admission of students'. This provides for a stronger protection of academic freedom and independence than does the Haldane Principle, as observed as recently as 2010 by BIS in its Strategic Plan. It would be weakened by the Green Paper's proposal to limit protection to ensure that 'ministers and officials could not single out specific institutions'. We note that the Green Paper acknowledges the importance of 'research which is directed within institutions' (p. 70), also protected by the 1992 Act, but it does not extend the same significance to teaching.

Question 19: Do you agree with the proposal for a single, transparent and light touch regulatory framework for every higher education provider?

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

Question 21:

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

Yes No Not sure

Do you agree with the proposed subscription funding model?

Yes No Not sure

Question 22:

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

Yes No Not sure

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

Question 23: Do you agree with the proposed deregulatory measures?

Yes No Not sure

We think the preceding questions are not in our remit as a Learned Society.

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?

Changes to the institutional framework are presented as reducing complexity. But we are concerned that they are also likely to reduce the independence of

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academic judgement in teaching and research that has been the recipe for international success of the UK higher education system for decades. We are pleased to see an acknowledgement of the Haldane Principle, but we note that successive governments have redefined the Haldane Principle when it suits them, usually towards more specific government direction of strategic priorities (for example by DIUS in 2008 and by BIS's 'clarification' of the Haldane Principle in 2010).

Furthermore, the statutory protections of the QR stream currently allocated to and by HEFCE are stronger, and we would argue that any redesign of the institutional framework must entrench in statute both the arm's length status of the Research Councils *and* the greater independence of the infrastructural arm of the dual-funding structure. It is as the Green Paper says the 'dynamic balance' between government indications of strategic priority and the independent determination by academic bodies of the actual allocations that lend the UK research base its greatest strength.

Question 25:

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

We would expect to see the independence of arm's length bodies safeguarded in legislation at least as strongly as at present, with stronger protections for what the Green Paper calls 'research directed from within institutions'.

Would you favour a degree of hypothecation to ensure that dual funding streams, along with their distinctive characteristics, could not be changed by that organisation?

Yes No Not sure

The two streams of the dual funding system have different purposes and different statutory status. As we argue above, successive governments have by redefining the Haldane Principle increased their ability to influence decisions made on the RC arm. At the same time the balance between the budgets of the two elements has shifted in favour of RC funding (for example, in the 1992 'dual support transfer' and again in 1998 in order to fund the Arts and Humanities Research Council – in both cases from the QR to the RC stream). To protect both the value and the independence of QR funding, some longer-term guarantee ought to be provided fixing the balance between these two budgets, as indeed is recommended by the Nurse Review.

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?

QR is essential to the independence of individual academics and their employing institutions. Without it, student fees would presumably have to be used to cross-subsidise research infrastructure, which would be difficult to justify, not least to students. Above all, QR ensures, as the Green Paper puts it, that research 'may be

purely curiosity-driven, respond to individual partnering opportunities, or may be in rapid reaction to advances in a given field'. These qualities are more important to the humanities than to the sciences, as our research does not cluster so readily or fruitfully around easily identifiable research frontiers or immediate applications. It is for this reason that, rightly, 85% of government research funding in the humanities is provided by QR and only 15% by RCUK. As a means of distributing QR, REF has its critics, yet so far no one has come up an alternative that would be credible and consistent while also identifying and rewarding quality in all its many manifestations. In fields such as ours where quality is very widely distributed across a range of institutions, it also enables individual achievers to gain recognition independent of the reputation of their institutions and also to small pots of funding that have disproportionately significant effects in stimulating creative research across the system. This plurality is a sign of health in UK HE that is rightly envied abroad.

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

If REF is to measure research quality wherever it is, we need to find ways to reduce the extensive (and expensive) game-playing in which institutions engage, modelling the exercise many times in advance and erecting elaborate selection processes that divide the academic community and distract from the research enterprise itself.

One option would be to require the submission of all research-contracted staff, but this requirement suffers from the fatal flaw that it would encourage the proliferation of teaching-only contracts and the bifurcation of HE into research and teaching streams, which, as the Green Paper indicates, would be to the detriment of both.

There might be opportunities to create a virtuous relationship between TEF and REF which enshrines the combination of teaching and research in both exercises and increases the proportion of staff on permanent teaching-and-research contracts.

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

We don't think that in the humanities more or better data about research is likely to improve the assessment process. The Wilsdon Review (see esp. ch. 4) pointed out that metrics are not very useful to assessing either impact or quality in the humanities (or, more precisely, even less for the humanities than for other disciplines).

Do you have any other comments that might aid the consultation process as a whole?

To summarise, the RHS:

- welcomes a renewed emphasis on teaching quality, but is concerned that perverse incentives may be created by the focus on proxies that have little connection to actual teaching quality;
- wants to see teachers at the heart of any assessment of teaching, shaping and defining good practice;
- believes that teaching cannot and must not be separated from research. Both should be valued professionally and must be understood as mutually reinforcing;
- believes that teaching methods and outcomes differ so much between disciplines that any assessment would have to be done on a discipline-by-discipline basis (which might carry dauntingly high regulatory and economic burdens);
- believes that the dual funding model for research must be protected.