Submission to Higher Education and Research Bill Public Bill Committee

Executive Summary

1) GSM London is an independent higher education institution based in London. We play an active role in the development of independent higher education and are significant contributors to widening participation in higher education. GSM London works hard to provide an innovative, tailored education for our students.

2) GSM London welcomes the government’s focus on improving student choice and enabling the growth of quality alternative providers as part of the reforms outlined in the Higher Education and Research Bill.

3) Our submission focuses predominantly on Part 1, Chapters 8, 9, 11, 12 and 16 of the Bill. Some elements considered in our submission, such as the metrics included in the Teaching Excellence Framework (TEF), are not directly included in the Bill. However, they form an important part of the wider context of the Bill’s reforms and play a role in the detail being considered in specific clauses.

4) GSM London believes it is essential that all forms of quality assessment undertaken by, or on behalf of, the Office for Students (OfS) use appropriate metrics to ensure accurate assessment of institutions takes place. Assessments must accurately reflect the increasing diversity of provision and students within the higher education (HE) sector. They should not rely on unsuitable proxy measures.

5) We would also welcome further detail on the government’s plans for the creation of a Quality Assessment Committee. While GSM London is supportive of the creation of such a committee it is essential that it is fully representative of the whole HE sector.

6) The Bill’s focus on robust access and participation plans should be positive for widening participation. However, the OfS’s work regarding the plans needs to include the sharing of best practice, to improve access across the sector, rather than just focusing on an institution’s intentions on widening participation.

7) An important potential contributor to widening participation is access to innovative degree models such as accelerated degree courses. The current tuition fee arrangement acts as a significant disincentive to access to these courses that are much more appealing to students from lower income backgrounds, as students are not able to access a loan to cover the full costs of the course. We believe this should be addressed by the Bill.

8) GSM London welcomes the powers the Bill will give the OfS to validate degrees or require a provider to enter into a validation arrangement. This should provide more security for alternative providers who lack the stability of degree awarding powers and are at risk of such arrangements breaking down through no fault of their own.

Submission

About GSM London

9) GSM London is an independent higher education institution based in London with campuses in Greenwich and Greenford. Founded in 1973, GSM London offers business-specific courses at undergraduate and postgraduate levels alongside other specialist training.
10) We have over 7,000 students undertaking career-oriented degrees validated by Plymouth University and 82 permanent staff. Their work is supplemented by 85 associate or visiting lecturers.

11) As an alternative HE provider our three year degree courses only cost £6,000 per year. Students are able to access tuition fee loans to cover this cost.

12) GSM London plays an active role in the development of independent HE. This includes contributing to sector bodies such as GuildHE, HEFCE Strategic Advisory Committees, and the Leadership Foundation for Higher Education.

13) As a longstanding alternative provider we have also been early adopters of engagement with key bodies like the Quality Assurance Agency (QAA) and Higher Education Statistics Agency (HESA). This has enabled them to more effectively take account of the role of alternative providers in the HE sector and for us to demonstrate the high quality provision we offer.

14) We are dedicated to the regeneration of local communities through progressive and innovative higher education. We focus on supporting our students to maximise their potential through a tailored learning package that gives them the opportunity to improve their employability, and greater power of freedom and choice in their lives.

15) GSM London welcomes the government’s support for improving student choice in higher education by enabling the growth of quality alternative providers. GSM London works hard to provide an innovative, tailored education for our students, including through the provision of accelerated degree courses.

16) We also offer foundation year courses as part of our degrees. These enable students who wish to undertake a degree but do not yet hold the relevant qualifications, to obtain an appropriate level of qualification to allow them to meet the requirements of a higher level course.

17) This ties into GSM London’s work as a significant contributor to sector-wide efforts on widening participation. We undertake this in a meaningful way – creating opportunities for students from non-traditional academic and socio-economic backgrounds. Over 90 per cent of our students are Black, Asian or minority ethnic (BAME), with an average age of 30 years old upon commencing their studies.

18) We believe that quality alternative providers should be supported to compete on a level playing field with publicly funded institutions, for example through holding their own degree awarding powers (DAPs). This will continue to ensure that students are able to make the best choice about their education and access the types of courses that work best for their individual circumstances and ambitions.

19) GSM London welcomes the Bill’s focus on monitoring and regulating the quality of provision for students, including through the introduction of the Teaching Excellence Framework (TEF). Although the details of the TEF are not addressed explicitly in the Bill itself, they are important elements of the government’s reforms and the broader agenda on widening participation. The benchmarks and metrics used will also likely have a bearing on the implementation of the wider quality regulation measures included in the Bill. Therefore, they must be taken into account by the Committee during its scrutiny of the Bill.

20) GSM London supports the principles behind the TEF and in particular the focus on ensuring it supports the widening participation agenda. If implemented effectively with the right metrics, the TEF should enable students to access better information with which to compare institutions.

21) However, it is essential across all forms of quality assessment undertaken by, or on behalf of, the Office for Students (OFS), as per clause 23, that appropriate metrics are developed to ensure accurate
assessment of institutions takes place. For example, the measures to be used as metrics in Year Two of the TEF are not sufficient long-term proxies for teaching quality and may inadvertently penalise those providers doing the most on widening participation. For example, student employment after a course is completed is not a good indicator of teaching quality. The government should instead wait for the development of the Longitudinal Education Outcomes dataset before confirming a more appropriate metric on highly skilled employment.

22) Similarly, plans for benchmarking providers need to be improved, so that assessments accurately reflect the increasing diversity of provision and students within the higher education sector. The existing method of benchmarking UK performance indicators (UKPIs) should not be replicated as this will not reflect diversity of provision. For example, a framework should include the development of appropriate benchmarks for mature students that do not group together all students who are not immediate school leavers.

23) In addition, we would welcome further investigation into whether or not students from minority ethnic backgrounds and students with disabilities are more likely to drop out of higher education. This will help ascertain whether this is an area that requires benchmarking and whether institutions should specifically be working to improve their retention rates for these groups.

24) GSM London would also welcome clarity on the government’s plans for the creation of a Quality Assessment Committee, as per clause 24 of the Bill. We are supportive of the creation of such a committee to support the OfS’s duties. However, it is essential that the committee is fully representative of the whole HE sector. This should include involvement from a number of alternative provider representatives, rather than just awarding the sector a token spot for a single provider on the committee. Alternative providers play, and will increasingly have, an important role in ensuring student choice in HE. Therefore, appropriate engagement will be essential in order to fully understand the sector’s development over the next few years.

25) **Recommendation: In light of the above, GSM London recommends that the Bill Committee:**
   a) Seeks clarity on how the government will ensure the metrics used in the TEF will appropriately benchmark providers and recognise the work of those doing the most on widening participation. Further clarifies how this benchmarking will impact the OfS’s wider role on quality assessment, including the work of the Quality Assessment Committee.
   b) Seeks assurances from the Minister that the Quality Assessment Committee will effectively represent the whole range of HE providers and will not see only token representation from alternative providers.
   c) Calls for the government to assess whether or not students from minority ethnic backgrounds and students with disabilities are more likely to drop out of higher education, in order to ascertain whether this is an area that requires benchmarking and more focused attention to improve retention rates.

**Part 1, Chapter 9: Access and participation**

26) GSM London welcomes the focus on widening participation and ensuring that institutions have appropriate access and participation plans in place to widen access to higher education.

27) The access and participation plans are a positive step. However, this agenda needs to be about more than just intentions on widening participation. This is also true of the mandatory transparency condition in clause 9 (chapter 4). It is not sufficient to just identify or ask providers about the outcomes they achieve. These need to be improved while also maintaining quality of provision. Action on the plans needs to include the gathering and dissemination of learnings and good practice across the sector. We would welcome clarity on the government’s plans for this.

28) In addition to the specific clause on widening access, GSM London believes that the development of a learning gain metric for quality assessments needs to be prioritised. This will help to properly assess an
institution’s success at widening participation. Learning gain recognises a student’s progression from
the start of their course (from what can be a low level of prior educational attainment) to their level of
achievement at the end. This is an essential means of tackling the attainment gap between students
that have come from non-traditional socio-economic and academic backgrounds and those that have
been able to undertake a more traditional route into HE.

29) It is essential that achievements in regard to widening participation are given prominence in
assessments of institutions. We would welcome confirmation of the government’s plans in this respect,
and regarding plans for sharing best practice, during the committee stage of the Bill.

30) Clause 31 also notes that an institution’s governing body will be responsible for taking measures to
widen participation. They will also be required, as per clause 9, to provide the OfS with relevant
information in this respect, such as on applications received according to gender, ethnicity and socio-
economic background. We are looking forward to working with the sector to develop the role and
responsibilities of governing bodies. We would welcome clarity on how the government intends to
prepare governors to take on these additional responsibilities.

31) An important potential contributor to widening participation is access to innovative degree models
such as foundation year courses. In addition, accelerated degree courses are also key to improving
access to HE. GSM London is one of the first and largest providers of accelerated degrees. These
degrees offer a number of advantages to students by giving them the chance to gain a value-for-
money, vocationally-relevant degree and be available to work much sooner than if they took a standard
three-year degree course.

32) Students undertaking accelerated degrees can only access tuition fee support for two years, but receive
the equivalent of three years’ teaching and support over these two years. Therefore, fees exceed the
amount students can access through publicly funded loans. This restricts access to those able to afford
the additional fee required to cover the costs of running the course. This runs contrary to the
government’s ambition to widen participation.

33) This tuition fee arrangement is a significant disincentive to access to accelerated degree courses. These
courses are much more appealing to students from lower income backgrounds and those who wish to
enter the world of work as soon as possible.

34) Following the government’s consultation on accelerated degrees we believe this issue must be
addressed as soon as possible, ideally via the Higher Education and Research Bill, to ensure more
students are able to access this type of degree.

35) Recommendation: In light of the above, GSM London recommends that the Bill Committee:
   a) Seeks clarity on how the government will ensure that efforts to widen participation are given
      prominence in assessments of institutions. It is important the institutions are held to account for
delivering widening participation targets and that they share best practice.
   b) Calls for the development of an effective learning gain measure as part of efforts to monitor
      institutions’ success at widening access, in line with the development of access and participation
      plans.
   c) Seeks clarity on the government’s plans for the role of governing bodies in widening access, and
      how it will ensure the relevant level of skills and expertise within governing bodies to take on an
      expanded remit.
   d) Tables an amendment, or at least seeks assurances from the minister, about plans to tackle the
      tuition fee system disincentives for access to, and the provision of, accelerated degrees.

Part 1, Chapter 11: Powers to grant degrees etc. and Chapter 12: Powers in relation to "university" title
36) GSM London welcomes the proposals to improve access to degree awarding powers (DAPs) and
university title (UT) for high quality HE providers. Enabling increased access to these powers will
enhance competition in the sector and encourage a greater focus on quality from providers wishing to obtain, and retain, both DAPs and UT. This will be positive for student choice and access to the type of higher education they wish to undertake.

37) However, we have some concerns about the potential approach to probationary DAP and the time lag between DAP and university title. Although this is not a direct part of the Bill, this is related to the powers enabling the OfS to award probationary DAPs to new institutions and university title. GSM London is concerned about the impact of enabling such immediate access to DAPs will have on the perceived quality of more established providers with a quality track record. Further a blanket approach to those who earn DAP (either probationary or otherwise) and a three year time lag to university title may have the unintended consequence of leaving those institutions which earn full DAP reliant on their university validating partners for longer due to the challenges of recruiting students without the “university” designation. We urge the Committee to take a cautious approach to these measures and seek assurances from the government as to how it sees these playing out in practice.

38) Similarly, the powers to vary DAPs by subject area, while welcome for institutions with specific areas of expertise, must not be used to limit institutions’ growth into new subject area provision. This would be counter to the government’s plans to expand the sector and improve student choice. We would welcome assurances from the government to that effect.

39) GSM London welcomes the details in clauses 46 and 47 on validating degrees. Validation arrangements with other providers are always an area of risk for alternative providers as these can break down through no fault of their own with limited alternative validation options available. It is positive this is being recognised in the Bill by giving the OfS the power to require a provider to enter into a validation arrangement or to enable the OfS to validate degrees itself. This should provide more security for alternative providers, which is essential for the sector’s growth.

40) In light of the above, GSM London recommends that the Bill Committee undertakes the following during the Bill’s committee stage:

a) Seeks clarity on the government’s plans for probationary degrees and how quality will be assured.

b) Seeks clarity on the government’s plans for the three-year timeframe between achieving DAPs and receiving UT, and calls for flexibility to enable quicker access for established providers who achieve full DAP and slower access for those who gain DAP through the probationary phase.

c) Seeks assurances that plans to vary DAPs by subject area will not subsequently limit institutions from expanding their provision into other subject areas.

d) Welcomes the clauses 46 and 47 on validating degrees and notes the importance this has for the growth of alternative providers.

Chapter 16: Efficiency studies etc.

41) GSM London welcomes plans for the OfS to arrange for studies to improve the economy, efficiency and effectiveness in the management or operations of a registered higher education provider. However, it is essential that where this is undertaken that learnings are used and shared with the sector to help drive improvements across the board.

42) Recommendation: In light of the above, GSM London recommends that the Bill Committee:

a) Seeks clarity on how the efficiency studies will be used and call for the government to ensure findings will be shared with the sector as a means of sharing best practice and supporting sector-wide improvements.

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