Looking at the Higher Education and Research Bill and the accompanying amendments, please find six key concerns to us, as an institution:

1. **OMISSION OF ADDITIONAL CLASSIFICATIONS**
   - Clause 9, page 6, line 9:

In the amendments section, a suggestion was made to insert the following text (see figure 1), we corroborate this insertion.

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Gordon Marsden
Angela Rayner

Clause 9, page 6, line 9, at end insert—
“(iv) age band;
(v) people with disabilities, and
(vi) care leavers.”

Member’s explanatory statement
This amendment would include the people with disabilities and care leavers, as well as the age of applicants, in the published number of applications.
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![Figure 1: Amendment relating to clause 9, page 6, line 9](image)

2. **INTRUSIVE NATURE OF PAY / RENUMERATION COMMITTEE**
   - Clause 14, page 8, line 2:

In the amendments section, a suggestion was made to insert the following text (see figure 2). Brunel University London does not agree with such inserts, and furthermore, our Council has previously rejected (on more than one occasion) the suggestion that staff or students sit on the Remuneration Committee as it is inappropriate.

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Wes Streeting

Clause 14, page 9, line 2, at end insert—
(“) The list (as originally determined and as revised) must include the principle that
the governing body of a higher education provider publish the ratio of pay of the
highest paid employee at the institution to the pay of—
(a) the average, and
(b) the lowest
paid employee at that institution.”

Member’s explanatory statement
This amendment would require, as a public interest governance condition, the governing body of
a higher education provider to publish the ratio of pay between the highest, average and lowest
paid employees at the institution.
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![Figure 2: Amendment relating to clause 14, page 8, line 2](image)
3. RETAINING ROYAL CHARTER STATUS
   - Clause 43, page 24, line 24:
     There is significant concern regarding the proposal that the OfS should take the place of the Privy Council on
     issues relating to the governance of the university for those organisations that have a Royal Charter and make
     us answerable to a Ministry rather than Parliament.

4. VALIDATION BY AUTHORISED PROVIDERS
   - Clause 46, page 26, line 2:
     Brunel would like to oppose the notion that the OfS can require any HEI to validate the degree of another body.
     This requirement seems to threaten freedom of universities as to when and to whom degrees are conferred.

5. OFS VALIDATION ARRANGEMENTS
   - Clause 47, page 26, line 30:
     It is not appropriate for the OfS to validate a degree themselves. The OfS should not itself have degree
     awarding powers, they cannot be both a validator and a regulator.

     A possible solution to clause 46 and 47 might be for the OfS to contract with a (or a limited number of) providers
     to validate degrees of other providers.

   September 2016