

A new fit-for-purpose regulatory framework for the Higher Education sector

A response from the Society of Biology to the Department for Business, Innovation and Skills

27th October 2011

The Society of Biology is a single unified voice for Biology: advising Government and influencing policy; advancing education and professional development; supporting our members, and engaging and encouraging public interest in the life sciences. The Society represents a diverse membership of over 80,000 - including practising scientists, students and interested non-professionals - as individuals, or through the learned societies and other organisations listed below.

The Society of Biology welcomes the opportunity to respond to this consultation.

Consultation Question 2: We have set out our proposals on what responsibilities HEFCE should have in its role as the lead regulator. In implementing these functions, are there any processes that could be improved, reduced or removed while still protecting the student interest and public funds?

The consultation document¹ states that '*HEFCE's new remit will also include ensuring it a) sets its funding and any student number controls (or future public expenditure controls) in a way that promoted competition in favour of the student interest, for example so that increasing choice or ensuring value for money was taken into account in the allocation process....*'. We are worried that value for money will lead to decisions based on lowest cost provision which is clearly not always in the student and public interest. The teaching of bioscience subjects is expensive compared with arts and humanities subjects, because of the need to impart practical laboratory and fieldwork based skills, requiring adequate space, consumables, equipment and staff time. This is essential to deliver practical, hands-on experience in our graduates, which is essential for a successful economy. Science contributes enormously to our economic and social prosperity and the life sciences are a particularly successful story for the United Kingdom^{2,3}. The provision of appropriate science courses is both vital and in the public interest.

¹ <http://discuss.bis.gov.uk/hereform/technical-consultation/>

² Office for Life Sciences – Life Sciences Blueprint (2010) www.bis.gov.uk/assets/biscore/corporate/.../life-sciences-blueprint.pdf

³ HM Treasury - The Plan for Growth (2011) www.hm-treasury.gov.uk/2011budget_growth.pdf

We are concerned that the possible overlap between spheres of interest of the Higher Education Funding Council for England (HEFCE), Office of the Independent Adjudicator for Higher Education (OIA) and Office for Fair Trading (OFT) may make regulatory powers confusing. A single regulator would be the simplest solution. However, given the current landscape there should be, at the very least, clear statements on the specific powers and role of each body in relation to this critical issue.

Question 3: Do we need to consider anything additional to the proposals set out to enable HEFCE's role as a student champion in terms of protecting the collective student interest?

It is in the collective student interest that higher education leaves them employable on graduation, which requires degree programmes to provide both good quality specialist and transferable skills. A number of reports have claimed that graduates do not always have the necessary skills for employment after graduation⁴.

The key requirement for protecting the collective student interest is an effective quality assurance (QA) system that provides students with full information and ensures that - in a more open market - all providers are required to maintain the quality of degree provision and to make key information freely available. We are disappointed that this 'technical consultation' says very little about quality assurance mechanisms and the provision of QA information to prospective students. We note that BIS is consulting on this, but feel that a robust QA system should be trialled and implemented before making the other changes envisaged in this consultation document.

As students are to pay significantly enhanced fees, their interest in employability skills will inevitably grow. It will be important to help students to identify courses which have the strongest likelihood of providing them with the skills and education they require for particular career paths. The Society of Biology is keen to make sure students are able to make informed choices and to be more certain of the outcomes they can expect from their university education. For this reason, the Society of Biology has been working to develop an Accreditation Programme for undergraduate biology degrees⁵. The criteria put a strong emphasis on both academic excellence and critically, time spent in an active research environment. It will allow both students and employers to recognise the courses which will provide graduates with the required experience and skills for research careers. Accreditation will not be appropriate for all courses and, as with other subjects, many students will continue to take excellent non-accredited degrees, especially if aiming for non-research careers.

Consultation Question 8: We welcome views on how flexible provision such as two year courses could be encouraged.

We oppose a move towards fast-track two-year degrees as a new norm for strongly skills-based disciplines like the biosciences. Disciplines such as the biosciences are unlikely to be suitable for accelerated two year courses due to the significant laboratory and/or field work components. Our international commitments under the Bologna agreement push us in a different direction, proposing

⁴ Ready to grow: business priorities for education and skills; CBI (2010) <http://www.cbi.org.uk/pdf/2010-cbi-edi-ready-to-grow-business-priorities-for%20education-and-skills.pdf>

⁵ <http://www.societyofbiology.org/education/hei/accreditation>

a *minimum* of three years for undergraduate degrees. Chemistry and Physics have already moved significantly towards four year integrated Masters degrees as the entry route to research based careers and it is our belief that science degrees will increasingly require four years of study. The Quality Assurance Agency for Higher Education (QAA) should ensure that institutions planning accelerated science-based degrees offer students equal practical opportunities to those on three year courses.

Consultation Question 14: We would welcome your views on our proposal to link track record to the length of the degree programmes on offer and whether you see any risks with this approach.

We are concerned with the proposal to decrease the length of time that a body has to show a positive track record (section 4.4.12) before they are given degree awarding powers. Despite the regular review process, any decision to *remove* degree-awarding powers is likely to be contested which will be time-consuming, contentious and expensive; hence it is critical to ensure that the decision to award such powers in the first instance is well-justified. This is an area where the exercise of caution is entirely appropriate; we see no strong arguments for reducing the period of track record required.

Consultation Questions 17, 18, 19: Do you consider a six year period for renewals of degree awarding powers in the first instance is appropriate? If not, what period would you like to see and why? Would you like to see a longer period between subsequent renewals? What do you consider a reasonable number of renewals before being eligible for consideration for degree awarding powers indefinitely, subject to continuing satisfactory outcomes of periodic quality assurance reviews?

Renewal of degree awarding powers should be staged. We agree with the proposal that all new degree awarding powers be given initially on a renewable basis, but ultimately on an indefinite basis providing they are subject to satisfactory outcomes of periodic quality assurance reviews. We suggest that an organisation applying for degree awarding powers for the first time should be reviewed after four years (two iterations of a three year degree course) with a further renewal at ten years. After this we suggest indefinite renewal subject to satisfactory performance. As the proposals on safeguarding academic quality in the consultation document provide very little information we welcome the fact that the Department for Business, Innovation and Skills will be consulting on a transparent, evidence-based and rigorous process for this.

Consultation Question 20: Do you agree with our proposal to reduce the numbers criterion for university title to 1,000 full-time equivalent higher education students of which at least 750 are studying for a degree alongside a requirement that more than 50% FTE of an organisation's overall student body is studying HE? If you do not agree with this proposal could you please explain your reasons and also suggest an alternative proposal and why you think this would be better.

We do not believe that the general public and stakeholders in general, would associate their concept of a university with an institution that has as few as 750 students studying for undergraduate degrees, with possibly an equal number of students at school or FE level and no students studying postgraduate or higher degrees. Given that the document recognizes that *'the*

university title is prestigious, desirable and precious' we are surprised that it proposes a reduction by a factor of four in the minimum institutional size requirement for university title. The document advances no evidence that providers on such a small scale could maintain the quality and ethos of a university as currently understood. We are concerned that such changes may impact severely and negatively on the perception of the UK HE sector, damaging the UK public's confidence in the sector, and damaging the sector's ability to compete in the international student market.

We gratefully acknowledge the contributions of the Society of Biology's Council and Education, Training and Policy Committee; and Reverend Professor Nick Goulding of the British Pharmacological Society.

Full Members

Anatomical Society
Association for the Study of Animal Behaviour
Association of Applied Biologists
Biochemical Society
Biosciences KTN
Breakspear Hospital
British Andrology Society
British Association for Lung Research
British Association for Psychopharmacology
British Crop Production Council
British Ecological Society
British Lichen Society
British Microcirculation Society
British Mycological Society
British Neuroscience Association
British Pharmacological Society
British Phycological Society
British Society for Ecological Medicine
British Society for Immunology
British Society for Matrix Biology
British Society for Medical Mycology
British Society for Neuroendocrinology
British Society for Plant Pathology
British Society for Proteome Research
British Society for Research on Ageing
British Society for Soil Science
British Society of Animal Science
British Toxicology Society
Experimental Psychology Society
Fisheries Society of the British Isles
Genetics Society
Heads of University Biological Sciences
Heads of University Centres of Biomedical Science
Institute of Animal Technology
International Biometric Society
Laboratory Animal Science Association
Linnean Society of London
Marine Biological Association
Nutrition Society
Royal Entomological Society
Royal Microscopical Society
Science and Plants for Schools
Scottish Association for Marine Science
Society for Applied Microbiology

Society for Endocrinology
Society of Environmental Medicine
Society for Experimental Biology
Society for General Microbiology
Society for Reproduction and Fertility
Society for the Study of Human Biology
SCI Horticulture Group
The Physiological Society
Tropical Agriculture Association
UK Environmental Mutagen Society
University Bioscience Managers' Association
Zoological Society of London

Supporting Members

Association of the British Pharmaceutical Industry (ABPI)
Association of Medical Research Charities
AstraZeneca
BioIndustry Association
BioScientifica Ltd
Biotechnology and Biological Sciences Research Council (BBSRC)
BlueGnome Ltd
GlaxoSmithKline
Huntingdon Life Sciences
Institute of Physics
Lifescan (Johnson and Johnson) Scotland Ltd
Medical Research Council (MRC)
Oxford University Press
Pfizer UK
Royal Society for Public Health
Syngenta
The British Library
Unilever UK Ltd
Wellcome Trust
Wiley Blackwell