

FAO: Clerk to the Committee for the Economy

Committee for the Economy,
Northern Ireland Assembly,
Room 344,
Parliament Buildings,
Ballymiscaw,
Stormont,
Belfast,
BT4 3XX

8th November 2016

RE: The Higher Education and Research Bill

Dear members of the Committee for the Economy,

The National Union of Students-Union of Students in Ireland (NUS-USI) was established in 1972 under a unique arrangement where both the British and Irish national student unions, National Union of Students (NUS) and Union of Students in Ireland (USI) respectively, jointly organised in Northern Ireland to promote student unity across the community divide.

NUS-USI's agreed mission is to promote, extend and defend the rights of students and to develop and champion strong students' unions. Through our students' union members, we currently represent approximately 200,000 students across higher and further education in Northern Ireland

Therefore, I welcome the opportunity to provide our views in relation to the three specific areas of the Higher Education and Research Bill, as highlighted in your letter dated 24th October (Ref.:EC151/16), as well as some overall comments on the Bill generally.

Please find our comments overleaf, and should you require further information please do not hesitate to contact us via the details above.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'F McFerran', with a long horizontal flourish extending to the right.

Fergal McFerran
NUS-USI President

Comments from NUS-USI in relation to the Higher Education and Research Bill

- 1.** NUS-USI acknowledges that the Bill has limited direct implications for higher education provision in Northern Ireland, we would however like to express our concern about the motivation of the reforms proposed within it. Aspects of the Bill which expand degree awarding powers and actively encourage greater competition between institutions feed into a process of marketisation of higher education which arguably means the individual learner – the student – becomes an afterthought and the core purpose of higher education is diminished. We too see this as presenting challenges to the academic staff within institutions who are already under significant pressures.
- 2.** The point outlined above can be demonstrated explicitly in the fact that the Board of the proposed Office for Students (OfS), which will assume significant responsibilities from HEFCE, has no reserved place for a student representative. We also share concerns of the University and College Union (UCU) that demand more robust stipulations concerning the governance structure of the Office for Students, including proper staff and student representation on that body. This is an issue that the National Union of Students (NUS UK) have raised repeatedly and NUS-USI would encourage the Committee to consider how it can scrutinize that structure. We see this as incredibly important, especially given the fact that consent to joint working arrangements would effectively endorse this situation.
- 3.** Historically, the Northern Ireland Assembly and Executive have taken a broader view of the purpose and function of higher and further education than is espoused by the reforms within the Bill currently progressing in Westminster. We would encourage the Committee to reflect on that historical acknowledgement to tertiary education as being a public good, enhancing social mobility and improving life chances.
- 4.** We agree, as noted in paragraph 17 of the briefing paper provided by the Department for the Economy to the Committee on 19th October that the higher education sector in Northern Ireland exists in a sufficiently different and to some extent, unique context, meaning the role of choice and competition is effectively diminished here. However, it is because of this that we also believe the Committee should ask the Minister to detail his rationale for allowing institutions here to participate in TEF at all.
- 5.** In relation to the Teaching Excellence Framework (TEF), again, we have a number of concerns. The first, and arguably most significant issue relates to the link that has been made between TEF and inflationary tuition fee increases in England. To date we have received anecdotal assurances that there is no intention in the immediate future to have any link between TEF and tuition fee levels in Northern Ireland.
- 6.** We would ask that the Committee seeks a guarantee and commitment from the Minister that institutions here in Northern Ireland that choose to engage in TEF will not be permitted to link award outcomes to tuition fee levels in any way, in either the short or long term. NUS-USI would want to see processes in place to ensure that that

guarantee could not be reneged upon. We believe that attaching a monetary incentive to a measure of teaching quality is a dangerous precedent to set that would entirely diminish the intended motivation behind striving for academic excellence.

- 7.** An added dimension as to why is it important to prevent any link between TEF and tuition fee levels is that *(i)* undergraduate tuition fees already rise annually with inflation in Northern Ireland and *(ii)* long term decisions that need to be made in relation to higher education funding and its sustainability in Northern Ireland would be undermined if it was met with a precondition such as this.
- 8.** NUS-USI is opposed to the UK government's plans to link variable tuition fees to award outcomes of TEF and will oppose, in the strongest possible terms any move to use TEF as leverage to remove the tuition fee cap in Northern Ireland.
- 9.** Another concern we have in relation to TEF has been highlighted already in paragraph 1; if the new Office for Students will be responsible for overseeing the TEF process from 2018/19 we would ask the Committee to acknowledge that the lack of proper student and staff representation within the governance structures of OfS is a significant issue.
- 10.** The Minister for Universities and Science, Jo Johnson MP has taken steps to diminish the negative effects of the metrics used in the TEF, however, NUS-USI feels that DfE should conduct specific analysis regarding the consequences for institutions in Northern Ireland.
- 11.** NUS-USI joins the concerns raised by NUSUK and from across the sector regarding the risks associated with institutions being assessed against metrics which have been recognised by all involved as inaccurate proxies for measuring teaching excellence. Of particular concern is the use of employment metrics. We would like assurances that the Department feels they have been appropriately benchmarked to take into consideration the unique nature of Northern Ireland's graduate employment economy and the limitations, if any, this benchmarking may place on the robustness of the data.
- 12.** We would suggest to the Committee that Northern Ireland's branch of the University and College Union (UCU) are well placed to outline the many methodological flaws within the proposed metrics of TEF.
- 13.** We believe the Committee should consider the possibility of a separate TEF panel for Northern Ireland, to account for our specific context and perhaps provide a more collective, sector-wide interpretation of teaching excellence here.
- 14.** NUS-USI has no concern in relation to the third area of Bill which has a direct implication for Northern Ireland: powers to fund research in arts and humanities.