



# Response

## A Universities UK response on behalf of Membership to a consultation by another organisation

### HEFCE Formal Consultation on Improving Standards in Postgraduate Research Degree Programmes

#### Universities UK response

Representing the views of the main providers of postgraduate training in the UK, Universities UK welcomes the opportunity to respond to HEFCE's consultation on 'improving standards in postgraduate research degree programmes'.

Our members endorse the view that quality assurance in postgraduate research programmes (RDPs) is crucial to the development of future researchers. However, we find the consultation document's description of current "serious concerns" about RDPs to be unfocused and unclear, failing to acknowledge the achievements of UK postgraduate training, which is widely acclaimed, highly valued and continues to attract very large numbers of international students.

We also strongly believe that any discussion of how best to foster postgraduate talent amongst UK students must take into account the issues of increasing student debt and academic career opportunities which may affect the recruitment of such talent in the future.

Our response also calls upon the funding bodies to consider what impact the possible longer-term removal of research degree awarding powers from certain institutions will have on postgraduate opportunities.

#### For further information please contact

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## Introduction

1. UK universities are characterised by their ability to award research and other higher postgraduate degrees in an environment which fosters excellence in both teaching and research. Research training and education is a core primary activity and its pursuit enables new knowledge and synthesis to be produced.
  2. Universities UK welcomes the opportunity to respond to the proposals of the second consultation document. As the main providers of postgraduate training, our members endorse the view that quality assurance in postgraduate research programmes (RDPs) is crucial to the development of future researchers. However, while we are keen to ensure optimal provision, we find that the consultation document's description of current "serious concerns" about RDPs is unfocused and insufficiently clear, and thus fails to acknowledge the achievements of UK postgraduate training, which is widely acclaimed, highly valued and continues to attract very large numbers of international students.
  3. We also strongly believe that any discussion of how best to foster postgraduate talent amongst UK students must take into account the issues of increasing student debt and academic career opportunities which may affect the recruitment of such talent in the future. In the following, we shall address the consultation document's questions as set out on page 9, paragraph 36. The impact on postgraduate opportunities of plans which appear to be entertained by some of the funding bodies for the longer-term removal of research degree awarding powers from certain institutions should be considered.
- a) Is the approach set out in this document the best way for the funding bodies to respond to concerns about the consistency and quality of RDPs?**
4. Universities UK notes that the consultation presents little evidence for the claimed shortcomings of current RDP arrangements on which proposals are based, when many research active institutions already exceed the minimum expectations outlined. We endorse the principle of quality assurance in research training, but we have grave reservations about creating a rigid framework of prescriptions. Such a framework would be ill suited to the broad spectrum of individual research, and would further increase institutions' bureaucratic burden.
  5. Overall, it appears to us that the Research Councils, which are familiar with research practice in their disciplines, are more suited to the scrutiny of RDP standards than the Funding Councils. We understand HEFCE's desire for co-ordination and agreement on RDPs among the different research funders, but we are worried about the consultation's dogma of standardisation. We believe that equivalence of quality can be achieved through different systems, and that there should be room for diversity and for innovation by single universities. In our experience, the success of doctoral research programmes is to some extent influenced by the interaction of personalities, as much as by formal procedures which



guarantee processes, but not outcomes. For example, the use of an inappropriate external examiner in a viva voce examination would do nothing to ensure quality.

6. We agree that we must strive for the best possible training for all our researchers in academia, other parts of the public sector, and in business. The development of postgraduates' wider, employment-related skills is to be commended, but this agenda must not be implemented at the expense of the pursuit of original research. We regret the lack of detail of the consultation document, for example regarding suggested methods of delivery. Moreover, it is not clear at present whether the standards outlined are input or output requirements.

**b) Are the individual threshold standards and guidelines for good practice appropriate?**

7. We appreciate the complexity of finding different arrangements for different students, and note that research degrees are increasingly undertaken on a part-time as well as a full-time basis. However, we find that the suggested 'average time to submission' target fails to take into account the varying length of doctoral projects. Field work and language training are time-consuming, yet essential elements of high-quality research in certain subjects. Departments with doctoral students engaged in above average length projects are already being penalised by the Research Councils. There is a danger that under the pressure of completion targets, topics will become increasingly narrow, affecting the very nature of doctoral research. We believe that a more flexible handling of completion dates would also benefit part-time PhD students, self-funded students, split-degree students and students in transit to postdoctoral work.

**c) What, if any, are appropriate numerical targets for a critical mass of students, postdoctoral researchers and research active staff in different disciplines?**

8. We do not support the imposition of numerical boundaries on postgraduate research at higher education institutions. The needs of individual doctoral students, both in terms of access to other researchers and in terms of equipment, vary greatly, and even in research intensive environments, some key collaborations are built with outside individuals or groups. The decision of what constitutes a 'critical mass' for an individual project, therefore, should be left to the discretion of departments rather than based on numerical targets. It may be noted that the proposals for the European Research Area envisage an increase in researchers of 750,000 by 2010.

**d) Are there any aspects of the good practice guidance which should be threshold standards, or vice versa?**



9. All of the eight headings represent important elements of successful postgraduate provision. Due to the highly personal nature of PhD projects, we consider quality assurance in supervisory arrangements as the most crucial element. However, it is important to bear in mind that supervisions are ultimately built on the interaction of different personalities and that there are limits to optimisation through regulation. We furthermore believe that the provision of adequate facilities for the research project, such as library and IT facilities, is a key factor, and should hence be considered as a threshold standard rather than an element of good practice.

**e) Are the proposals for assessment the best way for institutions to engage with the programme, while still confirming to the joint funding bodies that the threshold standards are being met?**

10. Higher education institutions take great interest in the quality of their research degree programmes. High-quality research training and the development of postgraduate talent are vital. For institutions to engage with a programme of standards, it is essential that this programme does not erode institutions' ownership of postgraduate training, or disregard their experience and judgement. This advice is based on the provisions in the Further and Higher Education Acts (1992) that reserve the right of institutions to determine what is taught and how. It furthermore follows the precedent of the broad acceptance by the sector of teaching standards matters being codified in the existing system of points of reference which were developed jointly by the sector and QAA.

11. Given the already existing programme of audits by the Quality Assurance Agency (QAA) and in Scotland, the Scottish Office of the QAA, further restraints on RDPs and the involvement of the funding councils in the monitoring of internal quality assurance would impose an unnecessary regulatory burden. We therefore strongly support proposals to remit this task to the quality assurance agencies, whose auditors should be thoroughly acquainted with the new standards and evaluation process. We are astonished that HEFCE should choose to issue a separate consultation document when the QAA is in the process of revising its Code of Practice on Postgraduate Research Programmes with the active collaboration of the sector. This appears an example of uncoordinated and unnecessary administrative duplication.

12. Notwithstanding our views as expressed so far, we would propose that if the assessment of RDPs is to include PhD projects that were already underway before threshold standards were finalised, a gradual introduction of targets would be appropriate. As we have already outlined, we are worried that the pressure of performance indicators such as average completion times will result in reduced originality of PhD projects. The future allocation of funding for RDPs as outlined in paragraph 34 of the consultation document requires further clarification. Any move towards funding distribution according to RAE ratings would need to be based on clear evidence for the link between assessment performance and the quality of research training environments. We have not seen any such evidence.



**f) The implications of research degree awarding powers for postgraduate provision**

13. We are greatly concerned that the proposals of the consultation document appear related to possible plans for the removal of research degree awarding powers from certain institutions. We strongly believe that for the benefit of future research activity in the UK, it is necessary to ensure a broad geographic provision of postgraduate opportunities. Notably, research programmes in the healthcare professions need to be delivered right across the country. The concentration of research at a few universities threatens to restrict the supply of postgraduates, just when the UK needs more researchers. The uncoupling of teaching and research, moreover, would have serious consequences for institutions' ability to retain highly qualified staff, as this staff would have no prospect of gaining supervisory experience or building research teams of promising researchers. UUK will argue elsewhere that the maintenance of standards at honours degree level requires students to be taught in a research environment by research-active staff, whether supported by QR, Research Council or "third leg" funding, and that the skills which such teaching imparts of "know-how" in discovering original knowledge are an essential element certified by the award of honours, and are likely to feature in the qualification descriptor for the Bologna "First Cycle" award outcomes. A policy of concentration of research therefore also carries the risk that many UK honours degrees might fail to achieve recognition when or even before the Bologna process completes in 2010.