As the recognised trade union with collective bargaining rights for staff affected by proposals for compulsory redundancies and restructuring via the merger of two Schools, we have undertaken work to dutifully and constructively engage in the consultation process with the aim of finding alternative solutions to the claimed financial difficulties of Keele University, in order to avoid staff redundancies. Despite obstacles faced throughout the consultation process, which are outlined below, we have interrogated the proposals and the available data, and we have formulated a response and alternative proposals, which you can find below.

We understand that the justifications given for redundancies in the Faculty of Humanities and Social Sciences, in accordance with UK legislation and Keele policy, are 1) reorganisation or restructuring and 2) reduced need for work/reduced demand for a service. For the first, it is clearly linked to the proposal for the merger of the two schools. The second is more ambiguous and contradictory within the proposal.

Referencing that “growth has been uneven across the institution” (1.2; 1.11), the proposals imply that a failure to grow adequately and a reduction in demand for a service are synonymous, which they are not. This appears to be based on inaccurate assumptions about how growth is achieved in a higher education institution. Noticeably absent was any mention of significant university investment in both the Faculty of Natural Sciences and the Faculty of Medical and Health Sciences over the same period that is used to establish differences in growth. This investment will clearly have had an impact on the growth presented for those faculties, whilst historically, Keele’s investment in HUMSS has been minimal, particularly in relation to infrastructure and learning environments, especially with regard to the two Schools most threatened with staff losses in the current proposals. During the same period, for example, plans for rapid expansion of Natural Sciences involved significant capital investment, with the natural result being increased student recruitment and financial growth. Without also investing in HUMSS, however, these plans had inherent flaws, as increased recruitment in FNS requires increased recruitment in HUMSS in order to ensure the “HUMSS subsidy” (higher contributions expected by Keele from the Faculty with more “cost-effective” programmes). The University’s failure of financial management in these matters is not irreversible, but could be significantly worsened by the current proposals.

In the proposals, there is significant mention of a declining level of contribution over a four year period (Section 2, p3, main paragraph before the list). The university claims that FHUMSS contribution has fallen to 19% of the total faculty contributions. Yet this does not take into account the now very different sizes of the three faculties as a result of long-term University divestment from FHUMSS and investment elsewhere - in fact, the (currently stable) FHUMSS contribution of 44.6% is just barely below the FNS contribution of 45.3%, and almost 5% higher than that of FHM. As a result, the university has found a way to use the historic underinvestment in FHUMSS to justify further disinvestment.

There has been a longstanding concern held by Keele UCU and the Faculty of Humanities and Social Sciences, pertaining to strongly perceived political and ideological targeting of the Faculty. This is evident not only in failure to invest in the faculty, but also in continuing targeting of the faculty for cost savings and redundancies in order to further squeeze its already-high contribution. This urgent need for a higher contribution from FHUMSS dates back to at least 2018, and multiple rounds of voluntary severance had particularly high cost saving targets in the Faculty.

As our colleagues in the Keele Business School are keen to remind us, austerity does not bring growth. Keele UCU strongly challenges these financial narratives, and the assumption that growth will come on the back of austerity, when elsewhere in the university, it has only come on the back of investment. We also strongly challenge the targeting of the Faculty of Humanities and Social Sciences as we do not agree that this is the root cause of any financial hardships at Keele.

The proposals themselves fail to offer clarity on the financial position of the university, conflating short, medium, and long-term financial positions. In the proposals there is the identification of a medium-term threat as in line (1.3): 'the University is now unable to financially support its current model of academic and professional services delivery in a sustainable way. If urgent action is not taken, the medium-term risk of financial failure will be realised." However, there are short-term forces reflected in the references to "the University's cash position" (1.12, 1.13) and "current deficit and liquidity challenge" (1.14), related opaquely to "long-term financial sustainability" (1.14). These ambiguities of threat underpinning justifications for compulsory redundancies raise an important question: what is this process for and what is it actually going to resolve?

These three time-spans are an attempt to justify the assertion that "the University needs to revise both its academic and Professional Services operating model and cost base to remain financially viable" (1.15) and the line that justifies the whole proposal as "to deliver improved efficiency and start to restore levels of financial contribution" (1.19, see also 4.7). Ultimately, throughout the proposal this gets whittled down into the bald "Significant cost reductions are required to improve the financial performance and contribution of the Faculty, in addition to planned future growth" (4.2). *i.e.* we must cut to grow.

Further ambiguity rests with who is "in trouble" - the University or FHUMSS? Most of the expository provided in this proposal centres on the university's problem, until "the new School of Humanities and Social Sciences have a revised budget aimed at achieving a significantly improved level of financial contribution to help secure its future sustainability" (1.19). This is followed by another central line, "In order to move towards recovering previous levels of financial contribution and achieving a more sustainable level of financial contribution from the new School, the costs of the school will need to be reduced from those of the existing two Schools" (1.19). The unit of analysis has moved, and it is not known if it is Keele that is unsustainable, or if it is the schools. This proposal perpetually straddles this line.

Throughout the consultation process we have strongly challenged the financial reasons provided to justify proposing redundancies in the Faculty of Humanities and Social Sciences. We continue firmly to maintain this position. We are concerned about the ambiguity and seeming contradictions provided within the proposals, and having an understanding of Keele under the current Senior Management Team, we have grave concerns about other potential motivation in the selection of this Faculty as the target of redundancies.

We also, however, maintain our commitment to constructive consultation and to attempting to work with SMT to address any financial concerns in order to facilitate strength and growth across all areas of Keele. Below are specific alternative proposals to compulsory redundancy, and an engagement with the proposed selection criteria.

## 1. Halt Redundancy Process and Conduct a Review of the Financial Situation

The key justification for the proposed restructure and redundancy process is based on Keele's financial situation. The University has provided a narrative which links the perceived need to make savings to staff costs and student recruitment (through student fee income). Using some financial information provided by Keele and some publicly available data we have interrogated and challenged that narrative[1], clearly demonstrating that the issues Keele currently faces are not directly linked to staff costs vs student fee income. We consequently strongly believe that reducing staff costs is only a temporary fix, which will ultimately not resolve the underlying issues and following through with the current proposals will simply result in finding ourselves in similar positions in coming years. This is clear from the continued restructuring and staff cost savings exercises that Keele has undergone since at least 2018, but likely much further. Despite several rounds of voluntary severance, OneKeele, and several academic and professional services restructures (some with associated job losses), the Senior Management Team continues to impose a narrative that these exercises will ultimately save the University; clearly that has not happened, and one more round will not be the magic bullet it is being portrayed as.

Within our membership we have financial experts who are able and willing to work with Keele's SMT and financial team to openly review the financial situation in order to identify the true underlying causes. Should this be done we could then work together on realistic, long-term solutions. **We therefore propose halting the current proposals to conduct this review and be able to produce truly considered and realistic alternative solutions**. Unfortunately, the lack of full and long-term financial information, as well as the short timescales we have had to consider what has been provided (**most recently today at 14:11)**, inhibits us from providing more radical, meaningful and realistic long-term alternatives at this stage.

## 2. Extension of Consultation Period

The UCU Regional Official West Midlands has written to the Vice-Chancellor requesting an extension to the consultation period. We briefly echo this request here on several grounds:

a. The financial information we lawfully requested in November was provided a full week after (Dec 16th) the consultation period started (Dec 9th). Follow-up information financial queries have had delayed responses throughout, since the consultation meetings did not include any financial experts; **some of the information requested was only received this afternoon at 14:11**. Our one and only meeting with the Chief Financial Officer took

[1] These documents were produced by the Keele UCU Finance Team and submitted to Senior Management. Copies of the documents are attached as an appendices here, and are available at the link provided in the text.

place during the first week in January, almost a calendar month after the consultation started. The next FSP meeting will touch on aspects we believe crucial to the financial situation, and that takes place the week after the current consultation period ends.

b. Whilst initially we understood from the paperwork that SSRs were used to eliminate certain programmes from the selection pools, we have been told that HESA data on SSRs cannot be trusted as it is 3 years old; discussions around student numbers, however, are still based on HESA data. We have been told that WAM (and FTEs) are a better representation of capacity - however, for the last 6 months, and in particular in the last JNC we have requested meetings of the Workload working group, without success. Keele UCU remains firm that workloads are still an issue at Keele, which we want to work on - it is therefore difficult to accept that aspects we have been trying to resolve for months will be used in decision making about job losses. We have an upcoming JNC next week (again outside the current consultation period), which includes workloads on the agenda. As further detailed in the letter from the Regional Official, we strongly believe that further to the EDI impact assessment, it is necessary to produce a Health & Safety impact assessment on the effects of the proposals on the staff and students that will remain at Keele.

**We believe that the points above have severely limited our ability to engage in a meaningful consultation and that Keele should demonstrate it is a fair and reasonable employer by extending the consultation period** to allow the provision of the information requested, the meetings mentioned above to take place and for time for Keele UCU and individual staff to make considered alternative proposals to those tabled by the University.

3. **FTE Reduction & Voluntary Redundancy**

The proposals established a period for applications for Voluntary Redundancy (VR), which resulted in 17 applications; whilst we cannot know at this stage how many will be taken forward (decisions on approvals in principle will take place next week - again after the current consultation period ends), this number of applications is significant compared to the number of proposed compulsory redundancies (~5 KBS and between 20 and 24 in Humanities and Social Sciences: overall 25-29). We strongly believe that no redundancies are needed, but if they do happen, we support these voluntary redundancies over compulsory ones. Such a large number clearly should have an impact on the final proposals that SMT put forward to Council.

- Below we have a series of recommendations for changes to the selection criteria, which we have discussed through the consultation meeting; if any of them are incorporated, or any other changes are made to the selection pools or criteria, it would perhaps change the basis on which staff decided whether to apply for VR when it was open earlier in the process. **We therefore propose that it would be fair and reasonable to re-open the VR scheme if final proposals for compulsory redundancies are to be submitted to Council.**

In addition to voluntary redundancy Keele UCU members have discussed the possibility of a voluntary FTE reduction scheme with the Faculty targeted for compulsory redundancies. Our initial survey of academic staff in HumSS has assured us that there is significant interest in such a proposal and we have conservatively estimated that it could amount to *at least* 25% of the staff cost savings the University proposals indicate are required by the Faculty. Additional benefits (other than the small issue of saving people's jobs!) of such a scheme include:

- possible reversibility should student numbers increase or the financial situation improve through attack of the real underlying causes
- no loss of range of specialisms in terms of research or teaching, facilitating recruitment of undergraduate and postgraduate students, as well as a healthy research environment
- less negative impact on public (including potential students) perception of the University; any number of compulsory redundancies clearly indicate an institution in trouble and prospective students (and their families) would rightly be worried which would have a far wider impact than just the affected programmes, Schools or even Faculty.
- more retained potential to generate research grant funding and/or external partnerships
- reduced risk to the University of losses through legal recourse to compulsory redundancy

**We propose that Keele SMT should carefully consider the Voluntary Redundancy scheme and the possible FTE reduction scheme in conjunction, which should undoubtedly lead to NO compulsory redundancies**.

### 4. Senior Management Contributions

From published data it is clear that the central administration costs, and particularly staff costs associated with Keele's Senior Management Team have increased significantly over the last several years. Whilst the proposals include compulsory job losses for a number of staff, the University has additionally already asked all staff above a certain grade to buy additional annual leave, which could be seen as an FTE reduction. As stated above, our members are prepared to sacrifice pay (through an FTE reduction) in order to protect colleagues' jobs; we believe that Senior Management should lead by example and contribute to these alternative proposals to avoid compulsory redundancies. **As such Keele UCU membership propose that SMT also voluntarily participate in an FTE reduction scheme**. Due to the significantly larger average salaries of SMT members compared to targeted academic staff in the Faculty of Humanities and Social Sciences, even a small FTE reduction by all SMT would lead to very significant staff cost savings.

### 5. Modifications to Criteria & Selection Process

Compulsory redundancies are a red line for Keele UCU and we strongly encourage the senior management team to pursue our alternative proposals, a re-opening of the VR scheme as well as other cost savings through ongoing discussions. However, we find the proposals for the criteria and selection process deeply problematic, and comment on them here, as entailing significant legal and financial risks to the University:

- The criteria to reduce academic staff costs focuses only on research contribution (itself narrowly defined) which **comprises just 20% of staff workload. Academic Role Expectations state that an individual's performance should be looked at 'in the round' across an extended period of time.**
- The criteria retrospectively applies the Faculty Research Expectations (FRE) guidance, approved in April 2023 to the period beginning 1 January 2021.
- The criteria presents a tightly redacted version of the FRE, proposing staff to be assessed on outputs and does not include other key research contributions clearly identified in the FRE.
- The use of FRE for these purposes contradicts statements in the FRE to the effect that 'expectations ... should be understood as aspirational'; 'research funding opportunities differ from discipline to discipline'.
- The criteria **make no reference to the University Academic Role Expectations** (on which the FRE was designed and is linked to), where there are clear expectations that funding, outputs etc are **benchmarked to discipline, subject to changing distributions of work within a given unit, and varying over time.**
- The criteria treat all staff grades the same in term of expectations. University Role Expectations clearly delineate different expectations based on grade level, including research expectations.
- The process relies on (5.5) establishing a minimum headcount by programme via Student-staff-ratios (SSRs). During consultations with UCU, this has since been discarded in favour of an unspecified measure based on WAM. No information on how WAM feeds into this process has been published and the work on that has apparently not even begun. Further, as the Faculty Dean regularly amends WAMs as part of her role in managing the Faculty, any use of WAM calculations must be 1) transparent in how they are calculated for each individual; 2) open to challenges by staff who have identified omissions; 3) checked and verified by someone from outside HUMSS, such as an Executive Dean from the other two Faculties.
- Staff in the School of Humanities and the School of Social Sciences teach across cognate disciplines, allowing for programmes with few members of staff to deliver full degree offers. Removing staff from the pool based on programme SSRs does not also exclude staff who are instrumental in contributing to those programmes.
- University Academic Role Expectations disallow the use of REF scores or REF-like assessments from measurements of performance. This is due to widely recognised bias within the grading of research outputs in measurements such as the REF or assessing performance.
- The use of a very small number of internal readers with very limited expertise across numerous diverse disciplines to assign REF-style marks to staff outputs makes the outcomes of this process subjective rather than objective, and easily subject to challenge.
- Staff will not be assessed anonymously, leaving the university open to accusations of both conscious and unconscious bias. This is exacerbated by the fact that subject expertise will rest within the targeted areas themselves, and thus to attain that subject expertise without having to resort to paid external readers, those doing the assessing will likely also be 'in pool'.

- There is a danger of two-tier assessment in Phase 1 and 2 with staff not being treated/assessed equitably

Although Keele UCU reiterates its opposition to compulsory redundancy full stop, we nevertheless propose the following in regards to selection criteria:

1. Research (as narrowly defined) cannot be the sole criteria as it only comprises 20% of workload. Further, FRE cannot be used in a way that is contrary to the explicitly stated purpose of the document ('aspirational'), and it cannot introduce a new timeline for performance, particularly one that does not reflect the nature of work in the units targeted.

2. Selection criteria must reflect the commitment to keeping programmes open and deliverable. In this regard, the majority of 'remaining work' to be undertaken (as a result of loss of roles due to reduction in service demand) will be in teaching, academic mentoring, and administration.

3. If assessment of performance is to be used, this must draw on and be done in line with approved performance assessment procedures.

4. If assessment of overall performance is to be used, mechanisms for assessing 100% of academic staff's contribution need to be established and used, in line with University Academic Role Expectations and ideally in consultation with Keele UCU

5. If assessment of overall performance is to be used, there must be a mechanism for assessment that accommodates for varying expectations at different grades.

6. If performance assessment is to be part of selection criteria, the time frame used must extend to before the Covid pandemic.

7. If assessment of performance is to be used, this must be done in line with established and approved University Performance Management Policies.

8. In identifying 'in pool' areas across the University, clear and accurate selection data must be used. Single data pools, such as SSRs, are not accurate as they do not capture the work in or contribution of individual programmes. We recommend that this task be prioritised as identifying 'in pool' individuals based on incomplete data could be seen as subjective and easy to challenge through legal processes.

9. If Research contribution is to be used in assessment, it must be 1) assessed across all areas named in the FRE; 2) assessed in the context of disciplinary norms; 3) assessed in line with the Academic Role Expectations, and 4) weighted as only 20% of overall contribution

10. Selection Criteria must use the University AREs alongside a correctly read FRE

11. Any pro-formas must be provided to Keele UCU for consultation before they are distributed to staff. Pro-formas must not be distributed to individuals outside of the identified pool as to avoid causing concern or distress.

12. Should the University erroneously conclude that redundancies are still required, any change to the criteria must be followed by a re-opening of VR.

**Keele UCU Committee**

**24 January 2025**

**Appendices**

1. **Analysis of Student Income and Staff Costs -** *attached as file submission with consultation response (via email)*
2. **Humanities and Social Sciences FAQ** - *attached as file submission with consultation response (via email)*