

Universities UK response to the Teaching Excellence Framework technical consultation for year two

12 July 2016

Overview

Universities UK is the representative organisation for 133 vice-chancellors and principals of universities in the UK.

Universities UK welcomes the government's commitment to encouraging excellent practice in teaching and learning through the introduction of the Teaching Excellence Framework (the TEF). To ensure the TEF is effective in achieving this aim, we believe that it should be developed in line with the following principles. The TEF should:

- support institutional improvement of teaching
- give students useful information about teaching to inform choices
- respect the institutional diversity of the sector
- encourage pedagogical diversity and innovation
- preserve and promote the international reputation of the UK sector
- minimise bureaucratic processes and costs
- avoid perverse incentives or unfair market distortion

The UK higher education sector has a longstanding demonstrable commitment to improving and developing teaching and learning practice. This has translated into high levels of student satisfaction and attainment across the sector and the UK outperforming our international competitors. The TEF is a complex and innovative exercise that will only make an effective contribution to student decision making and teaching and learning practice if it is well designed and implemented.

Following the vote to leave the European Union, allied to the transition to the new regulatory framework as set out in the Higher Education and Research Bill, the UK higher education sector is now facing a period of significant instability. The recruitment of overseas students – particularly from the EU – is potentially at risk, and economic forecasts are increasingly challenging, both of which have implications for the financial sustainability of the sector.

In light of this it is essential that TEF 2, including its implementation and outcomes, is clearly treated and presented as a test exercise. Furthermore, **future versions of the TEF, including piloting of discipline-level assessments, should not proceed until lessons about the impacts of TEF 2 have been learned.** The primary focus of this iteration of the TEF should be to:

- i. establish what is realistic and desirable to assess through the TEF
- ii. ensure judgements can be sufficiently robust and fair to justify the impact of awards
- iii. test how judgements should be communicated clearly and effectively to students
- iv. provide a sound foundation for the future development of the TEF

To help achieve these objectives this response sets out a number of areas that would benefit from further consideration or clarification. Further detail is then set out in response to the specific questions posed by the technical consultation.

In summary Universities UK recommends consideration of the following steps:

- i. Future iterations of the TEF, including piloting of discipline-level assessments, should not proceed until lessons about the costs and benefits of TEF 2 have been learned.
- ii. The baseline 'meets expectations' award should be relabelled as 'good quality'.
- iii. A programme of communications and engagement work should be developed with the Foreign and Commonwealth Office, UK Trade and Investment, the British Council, the UK Higher Education International Unit and the Quality Assurance Agency.
- iv. The UK Higher Education Public Information Steering Group should lead testing and research to ensure that the TEF makes a valuable contribution to student decision making.
- v. The sector, through the assessment panel and the chair, should own the criteria of excellence and associated award judgments.
- vi. The TEF should use a criteria-based approach to grading, and guidance to the assessment panel should avoid 'anchoring' judgements against predetermined distributions.
- vii. The relative weighting and interpretation of the different components, including the core metrics, contextual evidence and institutional submissions, should be established by the assessment panel and made clear to applicants.
- viii. The TEF should not attempt to make judgements based on procedural and non-

comparable forms of evidence, such as:

- weighted contact hours and class size measures
 - proportional measures of investment in teaching and learning
 - details of experience and contractual basis of staff who teach
 - learning gain and distance travelled by students
- ix. There should be a process for clarification of institutional submissions prior to judgements or a mechanism for appeals against judgements built into the schedule.
- x. The benchmarking methodology used by the TEF should follow the model developed by the UK Performance Indicators.
- xi. The relationship and delineation between the evolving quality assessment system across the UK and the TEF should be kept under review, including:
- identifying opportunities for streamlining and focusing the TEF assessment framework
 - clarifying the relationship between TEF judgements and annual provider review
- xii. Consideration should also be given to the role of the Higher Education Data Landscape Steering Group to ensure alignment with wider changes in the data landscape that will affect future iterations of the TEF.
- xiii. There should be agreement between the relevant national authorities to ensure a coherent UK-wide approach to the TEF that is responsive to the different national contexts.
- xiv. A full evaluation should be conducted on completion of TEF 2 that includes consideration of the costs and benefits of the exercise and its contribution to student decision making.

1. Student choice

It is not yet clear how TEF judgements will make a constructive contribution to student decision making. Further work will be required to test how awards should be described and presented to students and their advisors and how awards will be used alongside other parts of the information landscape.

It is important that steps are taken to ensure that the TEF does not confuse students and their advisors. TEF judgements may play a significant role in student decision making but will represent a partial assessment of institutions while being based on metrics that are already presented through the Key Information Set and league tables.

Audience testing is required to assess how awards are likely to be used in decisions and how they should be presented to students. **The UK Higher Education Public Information Steering Group should lead this work** and should aim to align the TEF with other information initiatives, including Unistats and the Key Information Set, and with devolved national contexts.

There is a risk that the design of the TEF is overly focused on prospective students as 18-year-old school leavers. It is essential that the full diversity of students who may benefit from a university education is recognised, in particular mature and part-time students. This includes ensuring that assessment criteria do not bias against institutions recruiting these types of students.

Consideration should also be given to the potential impact of the TEF on international student recruitment markets and communication measures that could be taken to mitigate negative effects. This includes the wider reputational impact of the TEF as well as the potential use of TEF judgements in scholarship decisions by overseas authorities. In light of this we recommend that:

- The **‘meets expectations’ award should be changed to ‘good quality’** to emphasise that providers in this category meet the UK sector’s world-leading quality assessment requirements and are a good study choice. Further consideration should also be given to testing how ‘excellence’ and ‘outstanding’ can be communicated clearly domestically and overseas.
- **A programme of communications and engagement work should be developed with the Foreign and Commonwealth Office, UK Trade and Investment, the British Council, the UK Higher Education International Unit and the Quality Assurance Agency** to positively communicate the objectives, experimental status and outcomes of the TEF to overseas governments and agencies, sponsors and recruitment markets.

2. Robustness and transparency

It is essential that **the sector owns TEF judgements through the assessment panel and chair**, including the definition and interpretation of criteria of excellence. The assessment of a diverse range of institutions with diverse teaching missions and pedagogical models will present a complex exercise for assessment panels. In light of this clarity is required on the following aspects:

- i. how evidence will be weighted (ie the balance between metrics and institutional statements)
- ii. how criteria between different tiers will be agreed by the assessment panel
- iii. how judgements will be standardised across the assessment panel

There should be a transparent process through which judging panels will establish the criteria that will delineate between the different levels, how this will be interpreted in judgements and how this will be communicated to providers and students. The descriptions in Figure 9 of the consultation document do not currently define criteria on which judgements of excellent and outstanding can be based.

Universities UK welcomes the use of quantitative metrics as part of blended judgements. However, the assessment panel should also clarify the relative weighting and interpretation of the different components, including contextual evidence. For example, it is unclear whether provider submissions will be weighed equally with quantitative metrics, or only in 'borderline' cases, or whether it will be weighed more heavily than metrics.

Guidance to the assessment panel should avoid 'anchoring' judgements against preconceived distributions. A norms-based approach to grading that sets out to produce a spread of institutions across categories is not compatible with the intention of informing student choice and improving institutional teaching and learning practice. The aim of the TEF should not be to engineer stratification of the sector.

Further clarification will be required to guide institutional submissions. While the intention to avoid prescriptive exercise is welcome there is currently a significant risk that there will be a wide range of institutional submission strategies. This may make it harder for assessment panels to develop robust and comparable judgements.

3. Aspects of excellence and evidence

Teaching and learning is a diverse and complex process that is dependent on a variety of factors. **There is an inherent complexity in attempting to define and make differential judgements of excellence.** Definitions incorporate student outcomes, student satisfaction and peer-led pedagogical practice. However, there will be challenges in formulating judgements that take all of these into account, for example:

- Challenging students to navigate academic uncertainty and complexity can undermine the reported satisfaction of those who seek reassurance about expected outcomes or hold a transactional view of their education.
- There are few direct causal linkages between student achievement and procedural pedagogical practices that can be measured reliably, such as contact hours or class size.

For the TEF to make a constructive, long-term contribution to institutional teaching and learning activity, further consideration should be given to:

- i. inclusion of a criterion relating to the **use of evidence in support of development and innovation** of teaching and learning practice
- ii. **avoiding a focus on short-term policy priorities** that have a limited or contested

link with improving student outcomes

In particular, it is important that the TEF should not **make judgements based on procedural or non-comparable forms of evidence**. It is not clear that robust comparable evidence is available, or would be appropriate to collect, on the following areas:

- Weighted contact hours and class size measures
- Proportional measures of investment in teaching and learning
- Details of experience and contractual basis of staff who teach
- Learning gain and distance travelled by students

More consideration should be given to how evidence from internal subject and module review processes can be received and interpreted by assessment panels.

4. Relationship with quality assessment

The introduction of the TEF has encouraged an extensive conversation across the sector and within institutions about teaching and learning. However, submissions will involve significant institutional resources in light of the reputational and financial impacts of judgements. Furthermore, forming robust and comparable judgements on the basis of submissions provided on the basis of non-prescriptive criteria will be a complex exercise in its own right.

The relationship and delineation between the evolving quality assessment system across the UK and the TEF should be kept under review. Consideration should be given to opportunities for streamlining or clarifying the assessment framework. In particular there is an opportunity to delineate the relationship with the quality assessment system in the following ways:

1. **Avoid duplication between TEF criteria and quality assessment requirements.** The TEF should focus on areas where assessment panels can realistically give differential judgements on teaching and learning.
2. **Clarify how evidence from institutional quality assurance processes**, including for the purposes of professional, statutory and regulatory bodies, will be treated in TEF judgements.
3. **Assess the relationship between annual provider review and the use of TEF judgements in institutional risk assessments**, including the overlap of core metrics.

Consideration should also be given to the relationship between the TEF and institution-specific funding allocations for specialist institutions. Consideration should be given to:

- clarifying the relationship between these judgements
- how evidence provided for institution-specific funding judgements can be used in support of TEF assessments
- ensuring that the assessment panel is able to make judgements in relation to specialist institutions through its composition and structure

5. Core metrics

A range of factors can influence student satisfaction and destination measures, not all of which are directly linked to excellent teaching and learning practice. The core quantitative metrics should be used as part of blended assessments that recognise the limitations of assessing teaching excellence through student satisfaction surveys and employment destinations. It will also be essential that:

- i. there is confidence in the robustness of metrics and benchmarking and their interpretation to avoid distorted or flawed judgements
- ii. there is clarity on the relationship between core metrics and institutional submissions when formulating judgements

The design of the TEF has aimed to utilise metrics already available in order to streamline the process. However, it is important that the TEF does not take a selective approach to existing metrics that may undermine confidence in measures and generate confusion. In light of this **the TEF should follow the benchmarking model established by the UK Performance Indicators.**

Consideration should also be given to the role of the Higher Education Data Landscape Steering Group to ensure that the TEF is designed with reference to the wider data landscape and collection requirements. For example, there are a number of changes that will be take place in the short and medium term that will have implications on future iterations of the TEF. These include forthcoming changes to:

- JACS codes
- National Student Survey
- Destinations of Leavers from Higher Education Survey (DLHE)

6. Relationship with devolved nations

Universities UK is committed to maintaining a coherent, UK-wide higher education system. Key elements of the sector's quality architecture, including the Quality Code for Higher Education, remain UK-wide, while the sector continues to be seen as UK-wide overseas. The introduction of the TEF in England is likely to have reputational impacts for institutions in the devolved nations but with differing quality and regulatory contexts in Scotland, Wales

and Northern Ireland.

It is essential that there is agreement between the relevant national authorities to ensure that there is a coherent UK-wide approach. This should include consideration of:

- a. representation on the assessment panel for participating nations to ensure that definitions of excellence, including the evidence and criteria used to inform judgements, are shared across the UK
- b. handling the evidence submitted by institutions from Wales and Northern Ireland participating in the TEF in such a way that their context is appropriately recognised
- c. the investigation of an articulation scheme in Scotland that acknowledges an equivalent status of enhancement led institutional review to the TEF

Further details of the proposed approach for Scotland and Wales is set out in the separate consultation responses submitted by Universities Wales and Universities Scotland.

7. Monitoring and evaluation

The TEF represents an opportunity to make a valuable contribution to the sector. Treating TEF 2 as a test exercise presents an opportunity to develop an evidence base, including feedback from implementation, to ensure it makes a sustainable and long-lasting contribution.

It is important that an appropriate timeframe is dedicated to an evaluation of TEF year two. It is essential that this represents a full and robust assessment of the TEF and its impact. This should include:

- the contribution to and impact on student decision making and recruitment
- the cost of delivery, including institutional costs
- the relationship between the quality assessment system and the TEF
- the findings from submissions and the lessons for teaching and learning practice

Answers to consultation questions

Question 1 (Chapter 1)

Do you agree with the criteria proposed in Figure 4?

Not sure.

Please outline your reasons and suggest any alternatives or additions.

We broadly support the three high-level criteria and associated aspects. It is essential that these domains and criteria form a robust and transparent basis for submissions and formation of judgements. There are opportunities to further clarify and focus the assessment framework to ensure that it is realistic and facilitates the formation of robust and comparable judgements.

The aspects '*teaching quality*' and '*learning environment*' map across common descriptions of good teaching and learning. We welcome that the criteria aim to avoid a prescriptive framework of excellence. However, it is important that any guidance and criteria issued to assessment panels avoids procedural and/or unsubstantiated forms of evidence. This will be discussed further in our response to Question 8.

There is an opportunity to improve the clarity of the relationship between the TEF assessment framework and the Quality Code for Higher Education that may help to simplify the process. The inclusion of the aspect '*course design, development, standards and assessment are effective in stretching students to achieve full potential*' is a legitimate consideration but may benefit from clarification. In particular, this aspect may present practical challenges in terms of formulating robust and comparable judgements for the following reasons:

- The quality and robustness of course design is a central aspect of the quality code and quality assessment system, including internal institutional quality process and external validation.
- It is not clear that the composition of assessment panels as currently proposed will have the skills to formulate judgements on these processes and without direct reference to the quality code.
- It is not clear how panels will be able to robustly assess whether a provider's courses are stretching and challenging to students without reference to the Framework for Higher Education Qualifications or relying on personal heuristics and archetypes.
- It is not clear how the types of evidence proposed in the comments supporting this aspect (Figure 4), including NSS question 4, can realistically support comparable judgements of this aspect.

- There is likely to be significant overlap in the type of evidence submitted by institutions with the upcoming review of providers' own review processes as part of the new quality assessment system.
- Measures to prevent grade inflation are more appropriately treated as part of the quality assessment system and there is already separate activity underway in cooperation between HEFCE and the sector looking at sector practice.

This aspect should be reviewed to avoid duplicating quality assessment requirements and avoid flawed or partial judgements. Consideration should be given to revising the criteria to focus on the use of evidence in support of development and innovation in course design and delivery, including management of risks. Consideration should also be given to opportunities for enrichment and co-curricular activities as a holistic university experience.

The '*Student outcomes and learning gain*' aspect would benefit from clarification to focus on evidence that a provider understands, challenges and supports students to achieve their learning goals. Assessing student outcomes is a complex issue and the following considerations should be taken into account:

- The DLHE demonstrates employment destinations and is included as part of the core metrics but should be benchmarked and contextualised appropriately. It is particularly important that a provider's geographical location is factored into the assessment process; providers located in areas with high local unemployment rates should not be penalised.
- Other measures of learning gain and outcomes are in their infancy and there is no agreed method that could be reasonably considered as part of robust and comparable judgements. Methods are currently being tested through a HEFCE pilot programme and any inclusion in future iterations of the TEF should led by the findings from this exercise.
- Patterns of academic attainment should not be included in assessments as it risks undermining institutional autonomy and diversity and may incentivise grade inflation, even with inclusion of mitigating measures.

Question 2 (Chapter 3)

A) How should we include a highly skilled employment metric as part of the TEF?

The Standard Occupational Classification (SOC) system, developed by the Office for National Statistics (ONS), is the common UK-wide framework deployed by government bodies and agencies to classify occupations in terms of their associated skill levels and content. It is the main standard for classifying occupations and tracking employment outcomes.

Any use of this metric in support of judgements should take into account important limitations which should be made clear to the assessment panel. Students acquire knowledge, skills, social capital and enriching experiences through their time at university which have benefits far beyond the acquisition of a particular type of job. Moreover, there are a number of challenges involved in determining what classifies valuable or highly skilled employment and when best to make such judgements.

Graduates' career trajectories also vary considerably according to background, subject studied, individual goals and other factors. Collecting a snapshot of graduate employment at one single time and placing that 'snapshot' into a rigid classification system will elide important information related to graduates' career aims – such as whether they believe they are on track to achieve their ultimate career goals – just as it will ignore the distance a particular graduate has travelled since starting their university education. For example:

- Graduates from medicine typically enter highly-skilled employment in short order, often as part of a pre-planned workforce requirement. By contrast, graduates from creative subjects may spend a significant amount of time building a portfolio while supplementing their income with lower-skilled employment.
- Graduates may also use different types of employment as stepping stones to further study or particular careers. For example, care experience is often considered a pre-requisite for doing clinical psychology or other related areas of postgraduate study.
- Many graduates choose to build their skills and networks through entrepreneurial work or freelance careers, which although immensely beneficial to society and the economy are often difficult to classify.

Occupational tasks and requirements evolve over time; as such, the system is updated every 10 years to remain current. While it is not practical to update the system at shorter intervals, the description of occupational tasks and skill requirements can quickly become outdated. Recent academic research (Green and Henseke 2014) identified 13 occupations that, when classified during the 1990s, did not include functions and tasks normally requiring a degree, but that now do.

Relatedly, there are a number of occupations, often high-skilled and technological roles, which are newly developed and will thus be excluded from the current SOC, or described at a level that is not granular enough. For example, although graduate teaching assistants are normally PhD candidates, the occupation is classified within SOC group 6 (caring, leisure and other service occupations), a category whose occupations do not typically require a degree.

We welcome the consultation's proposal that the highly-skilled employment/destinations benchmark be benchmarked using the same factors as those included in developing the benchmark for the main employment/destinations metric. It is important that panel members

are provided with clear information about these benchmarks and how local employment data should be interpreted within the suite of contextual information.

The DLHE survey is currently under consultation. To support its use in the TEF it is essential that the DLHE and its specific highly-skilled jobs metric is based on a representative sample of graduates that has the confidence of the sector.

Future versions of the DLHE could include data sources that provide a more complete illustration of graduate achievement. These include questions that gauge the extent to which graduates believe they are on track to reach their career goals and questions that evaluate the types of skills graduates use in their jobs. This source of information will ultimately provide a more responsive and complete illustration of graduate achievement and highly skilled work than the SOC system does.

Future evaluations of the TEF should consider the replacement of a highly-skilled jobs metric with indicators that offer a more robust assessment of the skills graduates bring to the workforce.

B) If included as a core metric, should we adopt employment in Standard Occupational Classification (SOC) groups 1–3 as a measure of graduates entering highly skilled jobs?

Yes.

As noted in the response to 2a, the SOC system does have limitations in relation to granularity (such as drawing a distinction between graduate teaching assistants and teaching assistants in schools) and timeliness.

Restricting the highly-skilled classifier to SOC 1–2 would exacerbate these concerns and ignore the continual upskilling that has occurred across occupations. For example, limiting the highly-skilled metric to SOC 1–2 would exclude occupations that require high-level tasks and functions, including, for example, manufacturing engineers, civil engineering technicians, key workers, and authors, writers and translators.

C) Do you agree with our proposal to include all graduates in the calculation of the employment/destination metrics?

No.

Please outline your reasons and suggest any alternatives.

By adding these groups to the employment/further study denominator, there is potential for the metric to bias against institutions that graduate a larger proportion of disabled students, and those who are more likely to be in ill health or caring for others. This is likely to penalise institutions that recruit more mature and part-time students.

This approach would also differ from the methods used to calculate the current UK Performance Indicator (UKPI) on employment and further study, which excludes from the denominator graduates who are retired, travelling, ill or caring.

The UKPIs have developed a robust methodology through collective sector input to enable comparative performance data. The technical modification proposed here would produce a situation in which prospective students are faced with two nominally similar but technically divergent metrics; this has the potential to confuse students and undermine confidence in the higher education information landscape.

If the amendment to the denominator was taken forward it would be essential that the employment benchmark be adjusted to take account of disability and/or POLAR. This, however, would also require technical and methodological differences between metrics deployed for the TEF and the UKPIs, further confusing the information landscape.

Prospective students benefit from a higher education landscape that is comprised of clear and consistent indicators. Alterations to sector-developed, statistically rigorous metrics will confuse that landscape and devalue the information available to students.

Question 3 (Chapter 3)

A) Do you agree with the proposed approach for setting benchmarks?

Yes.

However, as stated in our response to question 2c, we do not believe that the employment/further study metric should be adjusted so that its denominator includes graduates 'who are retired, in ill health, looking after the home or family, or taking time out to travel or similar' as proposed under 2c.

If the denominator is adjusted, it is important that the benchmarking process reflects the potential for bias against institutions that graduate a larger number of disabled students; as such, disability would need to be included in the employment/destination benchmark. However, this would undermine the consistency and clarity of the information landscape.

B) Do you agree with the proposed approach for flagging significant differences between indicator and benchmark (where differences exceed 2 standard deviations and 2 percentage points)?

No.

Please outline your reasons if you disagree.

Reducing the threshold from three to two standard deviations/percentage points will significantly increase the odds for a 'false positive'. This would be further exacerbated by the use of multiple metrics and the pooling of data. This would undermine confidence in the accuracy of TEF judgements.

The UKPI benchmarking methodology has been developed to ensure that it has the confidence of the sector. An adjustment would introduce inconsistency and complexity that may serve to confuse into the information landscape. Observers, including students and league tables, would be presented with metrics that, while nominally similar, present very different figures.

Question 4 (Chapter 3)

Do you agree that TEF metrics should be averaged over the most recent three years of available data?

Yes.

Please outline your reasons and suggest alternatives.

It is important that institutional performance is assessed over time in order to reflect the importance of consistent outcomes for students across multiple years of study. Consideration could be given to the merit of weighting to more recent years to reward improvement.

Question 5 (Chapter 3)

Do you agree the metrics should be split by the characteristics proposed above?

Yes.

Please outline your reasons and suggest alternatives.

As with other areas clarity will be needed as to how these characteristics will be used to inform robust and comparable judgements. Consideration should be given to contextualisation and number thresholds to avoid skewed outcomes.

It should also be noted that POLAR relates to students under 21 and excludes mature students. Moreover, the use of POLAR is problematic for Scotland, where the Scottish Index of Multiple Deprivation is used instead of POLAR, and in London, where high levels of population density often mask differences in socioeconomic advantage.

There is an additional risk that further splitting of Black and Minority Ethnic and disability characteristics for smaller institutions could result in unrepresentative sample sizes, and potential volatility in outcomes, even when data is pooled over three years.

Question 6 (Chapter 3)

Do you agree with the contextual information that will be used to support TEF assessments proposed above?

Yes, however further clarity is required on the weight attached to contextual information.

Please outline your reasons and suggest any alternatives or additions.

Contextual information will provide panels with more information about a provider's student population and local context. Further clarity on the relative weight applied to the core metrics, institutional submission and contextual factors is critical to the legitimacy of the exercise in the eyes of students, stakeholders and providers. Guidance to assessment panels should also clearly set out where contextual information is also taken into account in benchmarking.

It is particularly important that local economic context, such as regional unemployment, and graduate mobility are included. Providers should not be penalised for factors that are outside of their control, such as the local labour market, or their graduates' ability to migrate to areas with more advantageous employment conditions.

However, the technical consultation document does not provide sufficient clarity on how this information will be interpreted nor how much weight panels will attach to it, relative to the core metrics and institutional submission.

Question 7 (Chapter 3)

A) Do you agree with the proposed approach for the provider submission?

Yes.

Institutional submissions will allow providers to showcase innovations in – and diversity of – good practice in teaching and learning. However, we would welcome clearer guidance as to how providers should present submissions and evidence.

There is a need for further clarity on the breadth of evidence institutions are expected to submit. Further clarity is also required on the relationship between core metrics and institutional submissions to allow for a more consistent approach to institutional submissions.

The window for institutional submissions is short. Notwithstanding the availability of this technical consultation it will be necessary for institutions to receive technical guidance in order to collate evidence and finalise their overall response.

B) Do you agree with the proposed 15 page limit?

Yes, however given the pilot nature of this exercise, we believe submission length should form an explicit part of the TEF year two evaluation.

Please explain your reasons and outline any alternative suggestions.

We welcome the intention to minimise bureaucratic burden behind this proposal. However, limiting page numbers does not necessarily reduce the cost of compiling submissions. In addition, it is likely to be difficult to present supporting evidence within 15 pages and may

make assessment of claims difficult. These factors should be reviewed during the evaluation of TEF year two.

Question 8 (Chapter 3)

Without the list becoming exhaustive or prescriptive, we are keen to ensure that the examples of additional evidence included in Figure 6 reflect a diversity of approaches to delivery. Do you agree with the examples?

Partly.

Please outline your reasons and suggest any additions or alternatives.

It is important that the guidance strikes a balance between clear and inclusive guidelines to help inform submission without prescribing a preferred model of evidence. There is a risk that a list of specific forms of evidence produces a ‘tick-box’ approach to institutional submissions and incentivises particular forms of practice where not pedagogically appropriate.

Therefore, the list should be clearly presented as indicative only, and guidance should ensure that panels consider a wider array of examples. It is particularly important that the guidelines refrain from prescribing a causal model of excellence, premised upon quantitative variables that have little proven influence on teaching quality or student achievement.

The inclusion of narrow, procedural elements will be unhelpful for the purposes of assessing teaching and learning excellence. Process-type metrics will incentivise ‘tick-boxing’ to generate evidence for future iterations rather than innovation or critical and strategic reflection on pedagogic practice. In addition, metrics that do not have robust grounding to facilitate comparative judgements should also be avoided at this stage.

The following types of evidence should not be included for TEF 2:

- Proportional investment in teaching and learning
- Teaching intensity, such as a weighted contact hours measure
- Qualification, experience and contractual basis of staff who teach
- Learning gain measures and distance travelled by students

Further consideration should be given to the incorporation of alternative types of evidence such as:

- How evidence from internal subject and module review processes can be received and interpreted by assessment panels
- Evidence of institutional teaching and learning strategy based upon pedagogical research or a provider’s own prior experience

As noted in our response to Question 7, academic research has found few causal linkages between individual elements of practice, such as contact hours or class size, and either teaching quality or student achievement. There is no agreement as to what the 'ideal' standard would look like, as this would vary across subjects, contexts, institutional missions and even individual students. In fact, a 2011 Quality Assurance Agency report stated:

Contact time with staff forms one part of an overall approach to learning and teaching that is designed to fit with the particular course and particular subject studied. There is no evidence to suggest that, taken alone, contact hours offer a meaningful way in which to measure quality. Quality (or more specifically, academic quality) is about an environment that creates the potential for students to success in their studies ... [and] is more commonly measured in a qualitative rather than quantitative way.

The paper goes on to add:

Previous studies have illustrated the difficulty of trying to tease apart multiple determinants of quality and student achievement, and advise caution in trying to assign a direct causal relationship between individual variables and student achievement.

This is particularly important in relation to forms of evidence, such as employer engagement in course design and recognition from professional, statutory and regulatory bodies (PSRBs): these are not equally relevant to all subjects, yet their specific inclusion could be seen as an opportunity for tick-boxing when not appropriate to the course/institution at hand.

Question 9 (Chapter 4)

A) Do you think the TEF should issue commendations?

No.

We recognise the intention to recognise diversity of practice through commendations. However, in light of the complexity of formulating assessments through this process we do not believe it is realistic to formulate robust and comparable judgements across these different areas. There is also a risk that commendations will encourage particular submission strategies or pigeonholing of institutions.

Question 10 (Chapter 4)

Do you agree with the assessment process proposed?

Partly.

Please outline your reasons and any alternative suggestions. The proposed process is set within a relatively tight timescale, reflected in the key dates included in Annex B. Responses should be framed within this context.

We agree with the broad assessment process, however we believe that the timetable for delivery is very short. In particular, it presents significant risks that there is insufficient time available for the panel to develop shared criteria to support robust comparable judgements that have the confidence of the sector.

Panel members should take into account the relatively short timeframe providers have had to gather and submit evidence for the TEF year two application, and varying amount of resource that different institutions will have been able to dedicate to such exercises. Given this is a new exercise one of the following options should be considered:

- a. a process of clarification of institutional submissions and supporting evidence prior to final judgements
- b. a process for appeals against judgements

The time allotted for an evaluation of TEF year two also appears short. The 'lessons learned' exercise needs to be a substantive process that can inform the development of future iterations of the TEF.

Question 11 (Chapter 4)

Do you agree that in the case of providers with less than three years of core metrics, the duration of the award should reflect the number of years of core metrics available?

No.

Please outline your reasons.

Judgements should be formed on a consistent set of metrics that communicate to prospective students an institution's proven and consistent track record of providing quality teaching and learning throughout the entirety of a student's course. Providers should not be eligible to apply until they have three years of complete data.

Question 12 (Chapter 5)

Do you agree with the descriptions of the different TEF ratings proposed in Figure 9?

We do not think the descriptions in Figure 9 sufficiently articulate the definitions of, and thresholds between, 'meets expectations', 'excellent' and 'outstanding.'

Please outline your reasons and any alternative suggestions.

The 'meets expectations' award should be changed to 'good quality' to emphasise that providers in this category meet the UK sector's world-leading quality assessment requirements and are a good study choice. Further consideration should also be given to testing how 'excellence' and 'outstanding' can be communicated clearly domestically and overseas.

We recommend that the assessment panels, comprised of teaching and learning experts, and stakeholders, should own the process of developing definitions and criteria for judgements. Clearer definitions should be presented in guidance issued to providers before submissions.

Further consideration also needs to be given to how awards will be described and presented to students, including contextual information that will be on display. The UK Higher Education Public Information Steering Group should lead research testing how awards should be presented and explained to students and their advisors in the context of the wider public information landscape.