

# THE FUTURE OF THE TEF

REPORT TO THE  
INDEPENDENT REVIEWER



Universities UK

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## EXECUTIVE SUMMARY

This report examines the development of the Teaching Excellence Framework (TEF), including its policy context, the design of its methodology and contribution to teaching and student decision-making. It aims to contribute to the independent review of the TEF by making recommendations for the future development of the TEF. The report is based on the principle that for the TEF to be in the public interest it should help:

- a. prospective and current students to find a place of study that offers a teaching and learning experience that suits their needs and their future personal, educational and employment goals
- b. the UK government and the Office for Students (OfS) in England to secure efficient returns on public investment by supporting strategic policy priorities and demonstrating value for money for the student support system
- c. universities to reflect and enhance the quality of their teaching and learning practice while allowing space for innovation without becoming a costly exercise that drives diversity out of the system

The evidence to date suggests that the TEF is having some impact on institutions, including teaching and learning strategies and the monitoring of TEF metrics. At the same time, awareness of the TEF remains low among prospective students, with most of them engaging with the TEF through existing channels including where awards are presented on university websites and through league tables using similar information. In this context, this report identifies a series of challenges for the TEF that include:

- a definition of excellence that is right to encourage a focus on teaching and learning outcomes but is weighted more heavily towards employment outcomes over the wider positive impacts of study for students and society
- a metrics first methodology that prioritises differentiation over reliability, and where some data is nearly 10 years old and irrelevant to prospective students or to the enhancement of their teaching and learning experience and outcomes
- an incremental and piecemeal process of making changes to the TEF that has increased the complexity of judgements in ways that are unlikely to be properly understood by students or be relevant to their teaching and learning outcomes
- a proposed subject-level methodology that will exacerbate all these problems at a significantly increased cost and with limited evidence of its value to students who already use a range of similar information sources to make their decisions
- the low rate of participation in the TEF by providers from the devolved nations, that is likely to decline further with the introduction of subject-level TEF

Universities UK (UUK) supports an effective TEF that aids student decision-making and makes a positive contribution to the teaching and learning experience and outcomes of students. This includes:

- engaging and supporting the development of excellent teaching and learning across the sector in a way that reflects the diversity of student interests and the social and economic needs of wider society
- acting as a strategic aid to different government policy agendas in higher education, including employability, by supporting the enhancement and impact of academic practice and the long-term quality of the sector
- being an effective and efficient exercise that provides a clear framework that supports the work of universities, and sets appropriate limits on its objectives and scope in the context of competing stakeholder priorities

To achieve these goals, the report recommends the TEF be developed through a clear and predictable process.

- **Give students and their universities a clear stake in the long-term development of the TEF.** The TEF should support the development of excellent teaching and learning, while also supporting student choice. Refreshed governance of the TEF should include a role for government and the OfS, students and their universities to shape its design, advise on its strengths and limitations, and its reasonable role in support of policy, fees and funding decisions.
- **Shift from a metrics-led to a metrics-informed assessment process.** TEF assessments should aim to examine the impact of a student's teaching and learning experience. This should include prioritising reliable judgements rather than differentiation between providers. To aid in this, the OfS should work with the sector to examine ways of enabling the comparability of a provider's own data on learning, impact and gain, rather than focus on new core metrics.
- **Rebalance the assessment framework back toward teaching and learning outcomes.** The TEF should remain engaged with relevant policy agendas, such as employment, but this should not be at the expense of a coherent and balanced assessment framework. Refreshed governance should include consideration of cyclical themes to ensure the TEF remains relevant to government policy agendas without continued growth in size and complexity.
- **Reconsider the introduction of subject-level TEF.** Subject-level assessment should not proceed until the limitations of the methodology, its costs to universities and the taxpayer and the actual value of its contribution to student decision-making in the wider student information landscape, have been fully considered. This should include considering how the aims of subject-level assessment can be achieved through existing or alternative information tools.

## 1. INTRODUCTION

This report examines the teaching excellence framework (TEF). It is intended to help inform the independent review of the TEF and the wider debates about the development of the TEF. It starts on the basis that an effective TEF should make a valuable contribution to student decision-making and teaching and learning. It has been compiled with input from Universities UK (UUK) members and conversations with groups and individuals around the sector. It draws on previous UUK surveys of member institutions participating in the TEF, a review of research and analysis conducted by other organisations and statistical analysis of TEF metrics.

The next section examines the history of the TEF including the rationale and process of its introduction. This is followed by an examination of the policy context for the TEF and what is likely to shape decision-making for the foreseeable future. Later, an in-depth examination of the TEF methodology identifies a series of challenges that may undermine confidence in the scheme and an assessment of the TEF's place in the student information landscape. The report concludes by setting out priorities for future development and recommendations to ensure the TEF remains in the public interest.

The report examines challenges for developing an effective TEF as an aid to student choice that can also support the enhancement of teaching and learning. UUK will also be providing a separate response to the specific questions posed by the independent review.

## 2. HISTORY OF THE TEF

Government has introduced the TEF as a way of:

- better informing students' choices about what and where to study
- raising esteem for teaching
- recognising and rewarding excellent teaching
- better meeting the needs of employers, business, industry and the professions

DfE (2016 and 2017) TEF specification

The TEF was introduced to help secure value for money from higher education. The Conservative party committed to introducing the TEF in its 2015 manifesto as recommended by former Universities Minister, David Willets. The proposal for the TEF sought to demonstrate a political commitment to students following the increase in tuition fees in 2012. The TEF also addressed an imbalance in government incentives placed on universities that favoured research over teaching. Furthermore, the TEF also helped to reassure the treasury to allow an uprating of the tuition fee cap in line with inflation.

The first TEF assessment in the summer of 2016 was based on the findings of the Quality Assurance Agency for Higher Education reviews and allowed qualifying English institutions to increase fees in line with inflation from 2017–18. The first full TEF assessment was introduced as a test exercise in autumn winter 2016–17 with the first set of results based on the gold, silver and bronze award structure published in May 2017 to last for three years. All English universities, except for The Open University, and around half of Scottish and Welsh institutions, participated voluntarily. However, the planned continuation of inflationary increases for participating in the TEF was paused following the 2017 general election with English fees capped at £9,250.

The TEF was subsequently given statutory footing by the Higher Education and Research Act (HERA), which enabled the Office for Students (OfS) to:

*“make arrangements for a scheme to give ratings to higher education providers regarding the quality of, and the standards applied to, higher education that they provide.”*

Schedule two of the act set out arrangements for a link between the TEF and fees in England, including the scope to enable a variation of fees between the upper inflationary cap and the lower £9,000 floor depending on performance in the TEF. This enacted the intention set out in the 2016 White Paper that from 2020, the TEF would award inflationary fee increases only to the upper two awards with institutions receiving the third-tier bronze award reverting back to the £9,000 cap.

Given the link to fees and the likely impact on institutional reputations, the TEF was subject to significant scrutiny during the act’s passage through parliament. Specific areas of concern included the link to fees, the effectiveness of the metrics-based assessment framework, the definition of excellence and the potential impact on UK higher education’s international reputation. To enable passage of the act, government conceded to pressure from the sector and parliament for an independent review of the TEF (section 26) that must cover:

- a. the process by which ratings are determined under the scheme and the sources of statistical information used in that process;
- b. whether that process, and those sources of statistical information, are fit for use for the purpose of determining ratings under the scheme;
- c. the names of the ratings under the scheme and whether those names are appropriate;
- d. the impact of the scheme on the ability of higher education providers to which the scheme applies to carry out their functions (including in particular their functions relating to teaching and research);

- e. an assessment of whether the scheme is in the public interest;  
and
- f. any other matters that the appointed person considers relevant.

To date, the development of the TEF has been led by the Department for Education (DfE) and implemented initially by the Higher Education Funding Council for England (HEFCE) and subsequently by the OfS. While the DfE has sought to consult on the development of the TEF, decisions remain on the responsibility of the minister for universities and science. TEF judgements are made by an independent panel appointed by the OfS comprising academics, students and those with relevant experience of employment and widening participation. The panel formulates judgements based on the assessment framework across three broad areas: teaching quality, learning environment and learning gain.

Following its establishment in January 2018, the OfS adopted the TEF and made participation a condition of registration for providers with more than 500 students. The OfS intends to use the TEF to incentivise the improvement of the quality of teaching across the sector and to provide information to students about where excellent teaching and outcomes may be found. Participation remains voluntary for institutions from the devolved nations where there is agreement between the respective national ministers as outlined in the HERA. Although devolved nations have been involved in the development of the TEF, its core design principles and decisions are led by the English policy agenda and ministers.

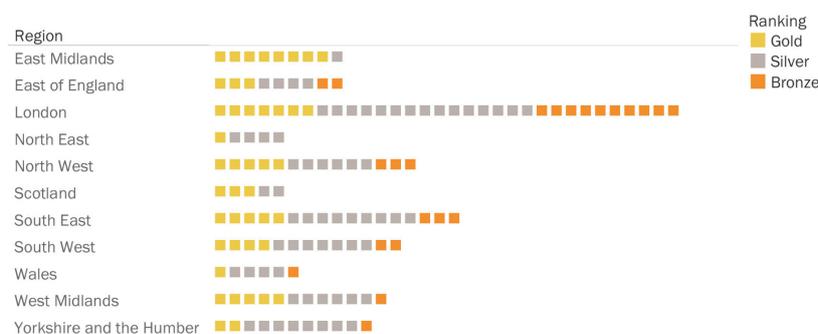
The most significant planned change to TEF is the move to subject-level assessment. Government committed to moving to subject-level assessment in the 2017 White Paper and reiterated this intention following a consultation on subject-level assessment in 2018. Piloting of subject-level methodology began in autumn 2017 and will continue through academic year 2018–19 before full implementation in 2020–21. The methodology follows the institutional assessment while trying to account for increased volume of assessment and reduced availability of core data. A government response to an associated consultation was released in October 2018, stating that after another year of subject-level pilots, the first full provider and subject-level TEF ratings will be awarded in 2021.

## THE TEF PROCESS SO FAR

Results from the first full year of the TEF Year 2, were published in June 2017. Providers were awarded ratings of gold, silver, bronze or a provisional award. 299 UK institutions applied for an award, including 134 higher education institutions. Of the 134 higher education institutions that took part in Year 2 of the TEF 33% achieved gold, 49% silver and 18% bronze. Both UUK and the DfE undertook reviews of TEF Year 2, finding no significant correlation between institutional or student characteristic and award outcome. However, the UUK analysis did find some positive correlation with entry tariff, and negative correlation with students living at home or recruited locally. It also found some correlation between metric suppression and gold awards.

FIGURE 1

Breakdown of TEF awards by region of provider  
(includes 134 providers designated as higher education institutions)



UUK (2017) Review of the teaching excellence framework year 2

As part of its 'lessons learned' exercise, the DfE carried out two pieces of research on the relationship between TEF results and student or institutional characteristics, and the relative contribution of differing metric flags to outcome. These highlighted some correlations between TEF outcomes and the percentage of older students who are local, and significant correlation between the three NSS core metrics, both with one another and the award. This informed changes for Year 3 and Year 4. The most substantive of these were:

- the halving of the weighting of the NSS-based metrics
- the flagging of high and low absolute scores
- the introduction of two supplementary metrics based on longitudinal education outcomes (LEO) and grade inflation
- changing the name of the framework to the Teaching Excellence and Student Outcomes Framework
- variations in process for providers with more than 35% part-time students including an additional page for their provider submission and the formation of two initial hypotheses, one for each mode of study

Results from TEF Year 3 were published in June 2018 with 86 full TEF awards made across all provider types. Of these, 26 were new applicants (not having applied in 2017), 29 had an expiring award from 2017 and reapplied, and 31 had a valid award from 2017 and reapplied. In total there are now 296 providers which hold a full or provisional TEF award. While most institutions kept their 2017 award, 31 reapplied in 2018. Of those, 13 higher education institutions improved on their 2017 position. These included the University of Liverpool and University of Southampton, who moved from bronze to silver, and Durham University and the University of York, who moved from silver to gold.

When combined with the 2017 results, 27% of all institutions have a gold rating, 51% silver and 23% bronze. Of the higher education institutions, 38% received a gold rating, 51% silver and 11% bronze.

The October 2018 government response to the subject-level consultation outlined further changes to the TEF. As well as alterations to the subject-level awards (as discussed below), further changes will be implemented for TEF Year 4.

- The student voice element of the TEF will be increased by introducing two new National Student Survey (NSS) metrics on learning resources and student voice, as the research found that learning resources is an important factor in the students' decision-making process. Halving of the weighting of NSS measures will continue.
- The TEF criterion on student engagement will be split into two, meaning there will be 11 criteria in total.
- The existing two benchmarked measures that draw on the LEO data set will be brought into the core metrics for subject-level TEF, rather than being supplementary (they will remain supplementary metrics for TEF Year 4). This is because the LEO data is administrative rather than self-reported survey data, and because it measures graduate outcomes over a longer timeframe. To counterbalance this, only one of the Destinations of Leavers from Higher Education (DHLE) survey metrics will be retained, focusing on outcomes of highly skilled students.
- The feasibility of a new metric looking at differential degree attainment to measure attainment gaps will be looked at.

### 3. THE POLICY CHALLENGES FOR THE TEF

For the TEF to make a valuable contribution to students and the higher education sector it should be responsive to evolving policy agendas and sector trends. This section examines the evolving policy context for the TEF and finds that competition to recruit students is likely to be increasingly intense in the short and medium term as the population of 18-year-olds declines temporarily. This will be set alongside ongoing uncertainty about teaching funding, value for money and the sustainability of the student support system. Similarly, the on-going debate about the UK's relationship with the European Union and wider world is likely to impact on the ability of universities to attract students, staff and research funding.

At the same time, there is likely to be an ongoing need to support flexible models of higher education to ensure that universities remain engines of social mobility that support the continuous development of skills in an evolving economic landscape.

The ongoing decline in part-time study will require universities to develop new, attractive forms of study that include accelerated study and degree apprenticeships; however, it may also extend to flexible, modular, credit-based study that may also need alternative forms of credentialing. In this context, it is essential that the TEF plays a positive role in supporting the quality of teaching across a diverse range of provision and needs across the UK.

Therefore, current and future policy challenges for the TEF include:

- understanding the role of the TEF in supporting student choice in an increasingly competitive market where the population of 18-year-olds is declining and there is increased pressure on institutions to attract students
- ensuring the TEF helps to demonstrate the value of investment in higher education while determining the reasonable role it can play in supporting funding decisions set out in HERA or beyond or delivering wider policy objectives
- supporting a sustainable and diverse sector that can meet the needs of different students, including mature and mid-career students, evolving and emergent sectors and regions, including those that do not traditionally return the highest rates of pay
- helping the sector to enhance provision, including closing attainment gaps between students from different backgrounds, while accounting for the prior and onward disadvantages faced by minority students and the wider benefits of university study

See Annexe A for a more detailed analysis of forthcoming policy decisions.

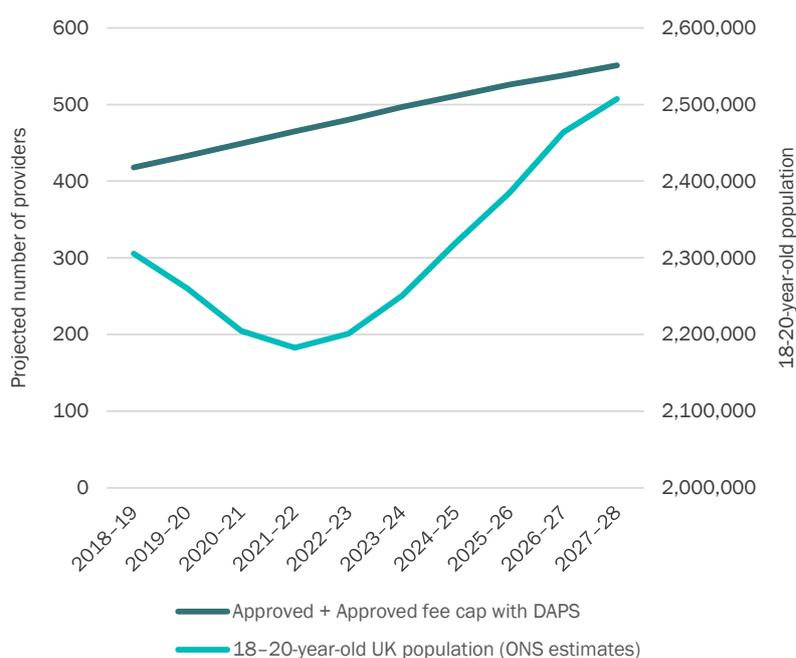
## COMPETITION FOR STUDENTS

HERA 2017 introduced a regulatory framework that enables common regulation of providers accessing public funds and those only accessing the study support system. Over the next ten years, the Department for Business Innovation and Skills impact assessment of HERA estimated that circa 100 new providers will be granted degree awarding powers. Although these estimates are unlikely to be met, this would have represented a growth of over 50% of the current number of institutions.

The OfS has been set up as a market regulator of the TEF for ‘incentivising excellent teaching and giving all students better information to help them choose the higher education experience that will be right for them’. The OfS believes that the TEF ‘represents a significant change in the information landscape for higher education, the value of which will be maximised as subject-level TEF is implemented, leading to better informed decisions and a sharper feedback loop for individual departments’.

FIGURE 2

Growth in 18-20-year-old population and projected growth of number providers



(BIS (2016) Higher Education and Research Bill: impact assessment)

The removal of student number controls has resulted in growing competition for students (UUK, 2018). The decline in 18-year-olds in the wider population is expected to continue for the next four years alongside uncertainty in international student recruitment, which, along with a projected increase in the number providers, will contribute to increasing competition to recruit students. This decline has been partially offset by an increase in the offer rate to 18-year-olds, primarily through a growing acceptance of BTEC qualifications.

This context is likely to increase incentives on institutions to maximise their attractiveness to students through information tools such as the TEF as well as league tables and other important sources of information.

## FEES AND FUNDING

The TEF is a tool for securing value for money for public investment on behalf of students and the taxpayer. It was intended at the outset to play a limited role in the setting of fees and, by extension, public investment into higher education. HERA enables the secretary of state to link TEF ratings to an upper fee cap, which may not increase faster than inflation, a secondary sub-level fee cap, and the £9,000 cap where a participation plan is agreed. The secretary of state can determine what is considered an upper rating for the purposes of linking to fees and fee caps which apply at an institutional level.

The Augar review, allied to changes in the accounting of the student loan book against government debt, are likely to result in changes to undergraduate funding. Steps may potentially include restricting the supply of places, access to student support, lowering fee caps or differentiating fees or student support by institution or subject. Reduced funding to the higher education sector would likely affect the quality of education on offer to students and potentially affect the sustainability of institutions. The return to a whole or partial direct teaching grants under either a Labour or Conservative government would also potentially shift TEF from being a student choice tool to an accountability tool for funding.

## ECONOMIC DEVELOPMENT AND SKILLS

The TEF has been intended as a tool to help meet the needs of employers and professions. Subsequently and the OfS is expected to play a role in supporting the government's industrial strategy. The industrial strategy aims to boost the UK's and support a geographically-balanced economy that anticipates increasing demand for higher-level cognitive skills to integrate digital, physical and biological technologies. By 2020 the World Economic Forum predicts that most occupations will rely on skills that are not yet considered crucial to the job today' and this is result in changes to the classification of a occupations when the measure used in the TEF is updated in 2020.<sup>1</sup>

In this context the TEF needs to address increasingly diverse needs of students and employers and regions of the UK. UUK in partnership with the CBI has found that providers are developing a range of provision to address these challenges, including online and blended provision, employer-based learning such as degree apprenticeships, and improving pathways from further education to higher-level qualifications.<sup>2</sup> At the same time, the government is focusing on

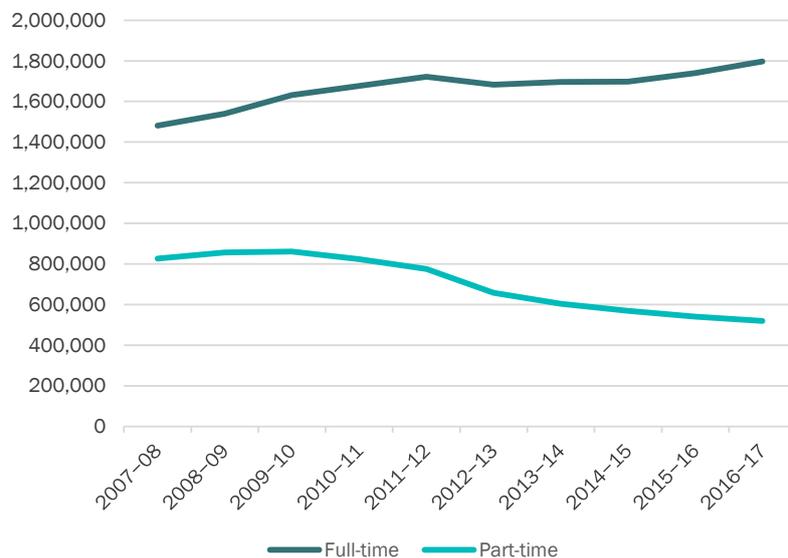
<sup>1</sup> Universities UK (2018) *Solving future skills challenges*

<sup>2</sup> Universities UK (2018) *Flexible learning: the current state of play in UK higher education*

accelerated provision that will be suitable for those able to take a dedicated period of time out of employment.

FIGURE 3

Change in students at UK universities by mode of study



However, between 2007–08 and 2016–17, the average age of undergraduate students across the UK has decreased by four years, with the number of mature learners falling by 21% over the same period. This is related to the fall in part-time undergraduate study in England, where entrants have decreased by 59% since 2011–12, compared to a 19% fall in Scotland and a 30% fall in Wales. This suggests that flexible learning options are needed to support those wishing to retrain, so that those who want to balance study with work and other commitments have the right time and support necessary to fulfil their potential.

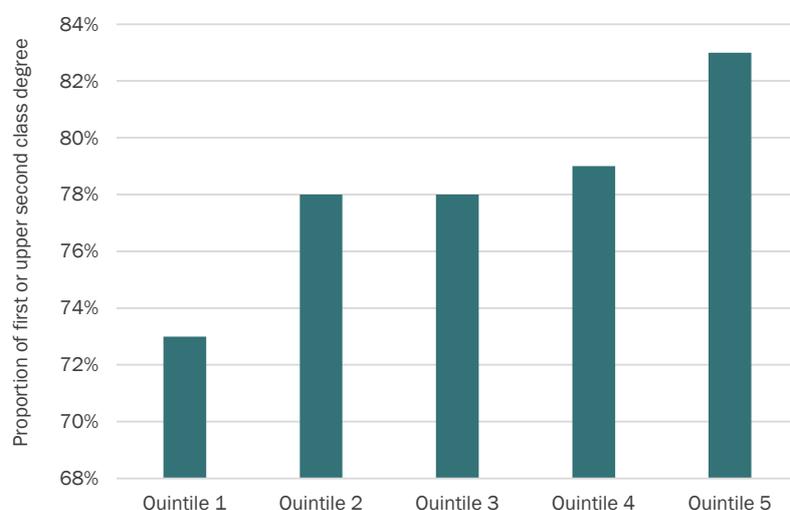
The TEF will also need to account for the diversity of professions and career paths available to students and the economic and wider social value these bring to local, regional and national economy. For example, the Institute for Fiscal Studies (IFS) has shown that certain subjects such as the creative industries, as well as professions such as nursing and education, are comparatively lower paid despite requiring higher-level skills.<sup>3</sup> In addition, the IFS' work has also shown that wages vary for graduates from institutions in different regions, including areas that have low levels of higher skilled employment.

<sup>3</sup> DfE and Institute for Fiscal Studies (2018) *The relative labour market returns to different degrees*

## SOCIAL MOBILITY

FIGURE 4

Attainment by educational disadvantage



Source: OfS, Differences in student outcomes

The UUK task force on social mobility<sup>4</sup> highlighted the role that universities can and should play in enhancing social mobility. In this context, the TEF represents an important tool to examine the impact of universities on their students, including differences in attainment and outcomes between different groups. In addition, the OfS in England has adopted the powers of the Office for Fair Access and aims to address attainment gaps within institutions via the regulatory framework and access and participation. This agenda aims to ensure that students from all backgrounds with the ability and desire to undertake higher education are supported to access, succeed in and progress from higher education.

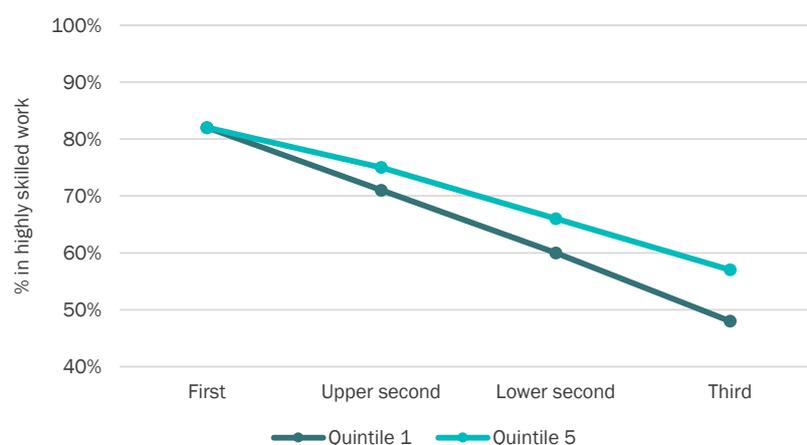
There is variation in student outcomes depending on their characteristics, for example degree outcome varies by 10% depending on prior social background (see figure 4). This is further corroborated by IFS research on how employment outcomes vary by social and economic background; it found that even where students attend the same institution and study the same subject, those from higher income families earn around 10% more than those from lower income families. This suggests that there are factors outside of institutional control which impact on outcomes depending on student backgrounds. (IFS, 2016).<sup>5</sup>

<sup>4</sup> UUK (2016) *Working in partnership: enabling social mobility in higher education – The final report of the Social Mobility Advisory Group*

<sup>5</sup> IFS (2016) *How English domiciled graduate earnings vary with gender, institution attended, subject and socio-economic background*

FIGURE 5

Employability gap by attainment and educational disadvantage



Source: OfS, Differences in student outcomes

## 4. DESIGN CHALLENGES FOR THE TEF

This section examines the challenges and trade-offs in the current design of the TEF in more detail. It finds that the TEF is inevitably founded on a compromise between the perspective of students, universities and government on what is meant by excellence in teaching and outcomes. However, the development of the TEF to date has been characterised by four important trends.

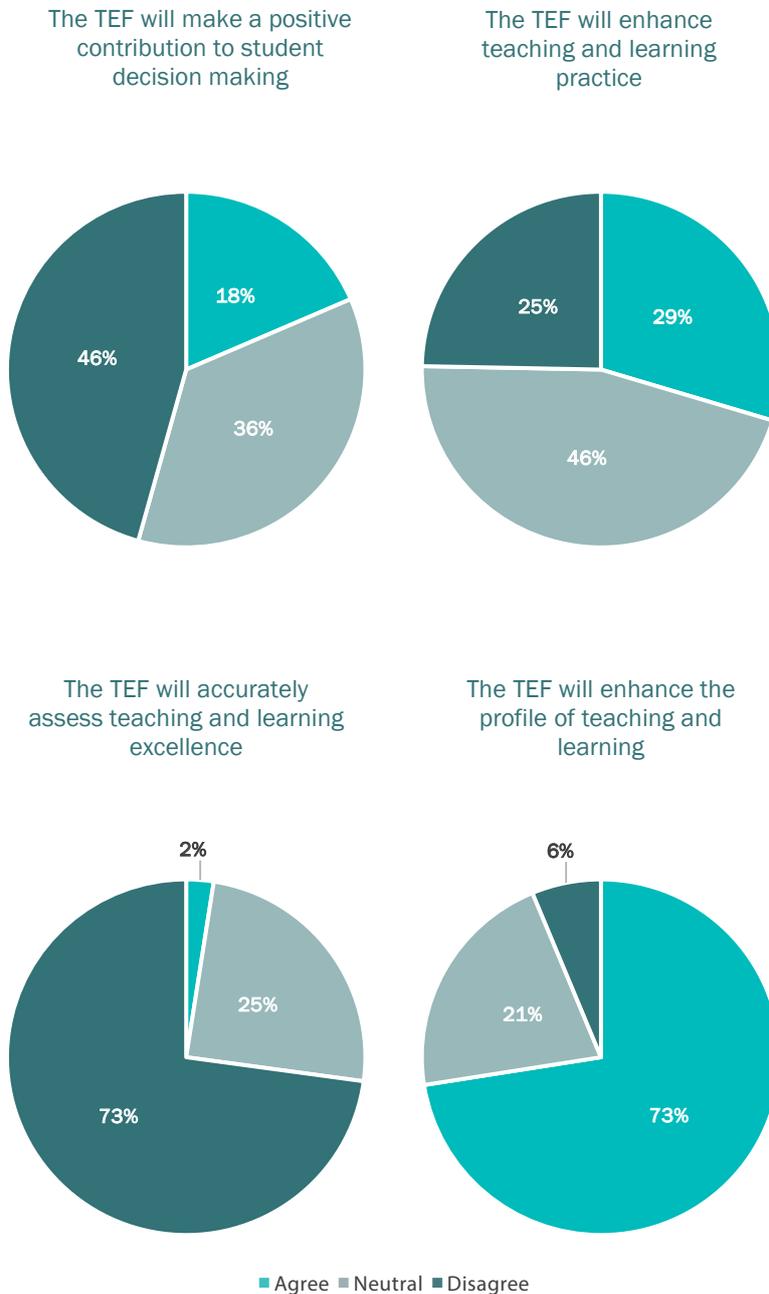
1. A definition of excellence that increasingly emphasises a government focus on employment and salary outcomes rather than wider definitions of higher learning, learning gain and impact on student's lives.
2. The development of a metrics-led assessment process that has prioritised differentiation between providers and subjects over the reliability of judgements that are relevant to student decision-making.
3. Increasingly complex assessments that have to account for conflicting agendas, including comparability and granularity of judgement, regional economic development, and student improvement and grade inflation.
4. The proposal to adapt the provider level methodology to subject-level assessment that will exacerbate the statistical limitations of the methodology whilst increasing the complexity for participating institutions and assessment panels.

A summary evaluation of the current assessment framework is presented in Annexe B.

## CHALLENGE 1: DEFINING EXCELLENCE

FIGURE 6

Survey results for confidence in TEF year 2



UUK (2017) Review of the teaching excellence framework year 2

Higher education is founded on the development of the cognitive and practical skills and knowledge necessary for a higher education qualification, as defined in the Framework for Higher Education Qualifications (FHEQ). Teaching excellence describes how students are guided and supported through this learning process. In this context students typically prioritise their direct teaching experience when defining excellence, institutions often emphasise the wider learning experience, including curricula and independent learning, and government is focused on outcomes relating to employment and skills.

The balance between these three perspectives is at the heart of the credibility of TEF and its role in promoting good quality teaching and learning. This was acknowledged in the higher education white paper *Success as a Knowledge Economy: Teaching Excellence, Social Mobility and Student Choice* that proposed ‘a broad view of teaching excellence, including the teaching itself, the learning environments in which it takes place, and the outcomes it delivers’.

However, Changes to the TEF to date have increasingly shifted the balance of the TEF towards a focus on employment and salary outcomes – this can be seen in the dominant weighting of the learning gain criterion. The core metrics of the learning outcomes criterion are solely related to employment outcomes and accounts for a weighting of 3 out of the 7.5 weighting of core metrics. In contrast teaching quality accounts for a weighting of 1.5 and learning environment is 2.5.

TABLE 1

Subject-level TEF metrics and weighting, 2018-19

ASPECT OF QUALITY	METRIC TYPE	METRIC	SOURCE	WEIGHT
Teaching quality	NSS-based	Teaching on my course	NSS Q1–4w	0.5
		Assessment and feedback	2016 NSS Q5–9, subsequent NSS Q8–11	0.5
		Student voice	2017 and 2018 NSS only, Q23–25	0.5
Learning environment	NSS-based	Academic support	2016 NSS Q10–12, subsequent NSS Q12–14	0.5
		Learning resources	2017 and 2018 NSS only, Q18–20	0.5
	Continuation	Continuation	HESA and ILR* data	2.0
Student outcomes and learning gain	Employment	Highly skilled employment or higher study	DHLE declared activity six months after qualification	1.0
		Sustained employment or further study	LEO three years after qualification	1.0
		Above median earnings threshold or higher study	LEO three years after qualification	1.0

\* Individualised learner record

Good employment outcomes are important to students but the evidence that they believe this reflects excellent teaching is more mixed. Recent studies suggest that the main factors driving students' perceptions of excellent teaching are:

- their direct experience of teaching and support as well as access to learning resources
- a good balance between class size, contact hours, self-directed learning and other external time constraints

For example, research conducted over the summer of 2017 by a consortium of students' unions asked 9,000 students about their views on teaching excellence. This work found strong support among students for a government exercise that encourages excellence in teaching, with 84% agreeing. However, when asked what factors demonstrated that a university has excellent teaching, student satisfaction and graduate employment were ranked as fifth and seventh most important out of seven factors.

The top three factors according to students were teaching / teachers, support and knowledge / skills gained. 94% and 93% rated course-specific and library resources as either important or very important to their teaching experience. These students were three times less likely to identify high graduate employment as important. When asked how teaching should be evaluated, for the majority of responses were for the use of direct feedback to teachers / tutors / lecturers (59%), compared to the NSS (45%).

The annual student academic experience survey by the Higher Education Policy Institute (HEPI) and Higher Education Academy (HEA) suggests little correlation between student engagement or teaching quality and contact hours or class size. However, it does reveal varying levels of student satisfaction with both contact hours and class sizes, with satisfaction declining notably below a threshold of approximately 12 contact hours per week.<sup>6</sup> Students also rated continuing professional development (CPD) in subject knowledge, CPD in teaching and training as the most important characteristics for teaching staff. Being an active researcher was considered less important by students.

More recent analysis of the HEPI / HEA Student Academic Experience Survey has shown that students' own perspective of learning gain is linked to several factors associated with the quality of their learning experience.<sup>7</sup> These include high-quality direct teaching, high-levels of independent study (more than 20 hours a week), support for students with low wellbeing and avoiding high levels of paid work. Other factors included how far they lived from their institution and whether they were studying at an institution with a gold TEF award.

<sup>6</sup> Neves, J & Hillman, N (HEA, HEPI 2016) [The 2016 Student Academic Experience Survey](#)

<sup>7</sup> Neves, J & Hillman, N (HEA, HEPI 2018) [The 2018 Student Academic Experience Survey](#)

In contrast, there is a gap between the definitions of excellence and learning gain used by institutions and the TEF. For example, it is not clear how institutions are able to comparably evidence learning gain in ways that remain connected to definitions of higher learning, as set out in the FHEQ, but which do not rely on academic assessment and credentialing. Notably in the TEF, improvement in degree outcomes is seen as evidence of grade inflation rather than improvement in teaching impact and student outcomes.

#### ADAPTED FROM FHEQ

- Knowledge and understanding – a systematic, extensive and comparative understanding of key aspects of their field of study, including coherent and detailed knowledge of the subject and critical understanding of theories and concepts, at least some of which is at, or informed by, the forefront of defined aspects of a discipline.
- Cognitive skills – a conceptual understanding of a level that is necessary to devise and sustain arguments, and/or to solve problems and comment of research and scholarship in the discipline, with an appreciation of the uncertainty, ambiguity and limits of knowledge.
- Practical skills – an ability to manage their own learning and to deploy accurately established techniques of analysis and enquiry within a discipline or as necessary for their discipline, including creative arts.
- Transferable skills – including the ability to communicate information, ideas, problems and solutions to both specialist and non-specialist audiences, the exercise of initiative, personal responsibility and decision-making in complex and unpredictable contexts.
- Professional competences – including specific professional requirements and the learning ability needed to undertake appropriate further training of a professional or equivalent nature.

As a result, in the context of the TEF, institutional perspectives of teaching excellence tend to focus on a range of process factors that extend beyond scheduled teaching time to incorporate the wider learning and teaching environment. At the same time, institutions also focus on the onward employment outcomes of their students to demonstrate their impact in relation to the learning gain criterion. For example, HEA analysis of all TEF narratives found five key themes which providers used to demonstrate teaching excellence.<sup>8</sup>

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<sup>8</sup> HEA (2017) *Analysis of the Teaching Excellence Framework (TEF2) provider submissions*

1. *Institutional structure* – cultures, values, commitments, embedded approaches, quality assurance and financial investment.
2. *Staffing* – staff qualifications, professional development, recognition and reward, and sharing best practice.
3. *Teaching delivery* – course design, pedagogical practices, assessment, feedback, student engagement.
4. *Support for learning* – resources, learning spaces, technology, academic support, student support, peer support.
5. *Wider support and experience* – student experience, extra-curricular, co-curricular, employability, enterprise, volunteering, clubs and societies.

Similarly, a HEPI analysis of TEF narratives focussed on a small sample of 12 institutions whose final award differed from that based on their initial hypothesis.<sup>9</sup> This analysis highlighted the themes of how each of these institutions evidenced teaching excellence under the three TEF criteria. In line with the government emphasis on student outcomes and learning gain, most submissions focused on geographical factors, employability programmes and careers support. In addition, evidence used QAA endorsements, students' union statements, cost and expenditure, user analytics, and highlighted prominent partnerships with employers and other organisations.

In this context, developing methods for evidencing learning gain was highlighted as a priority in the UUK survey of institutions. The HEFCE / OfS supported work on learning gain in supporting the development of methodologies to support evaluation of teaching impact; however, this work has further illustrated the conceptual problems with comparable learning gain across a diverse student population and different disciplines. As a result, much of this work has tended to focus on narrow ideas of learning gain linked to employment outcomes. Nevertheless, it has supported the development of methodologies that can potentially aid institutions to enhance and evidence the impact of their teaching.

## CHALLENGE 2: DATA QUALITY

TEF judgements are anchored into the initial hypothesis by performance against the core quantitative metrics. The metrics led approach aims to facilitate comparable judgements, with a focus on outcomes, while streamlining the assessment process by enabling panels to focus on borderline cases. In addition to presenting each core metric for all providers, students, panellists and assessors are also provided with split metrics according to student characteristics, including those studying full-time and part-time, and widening participation priorities. Panels are also presented with the absolute performance of institutions to account for very high and very low performance.

<sup>9</sup> HEPI (2017) *Going for Gold: Lessons from the TEF provider submissions*

Metrics and benchmarking methodologies are a legitimate way of comparing between providers as one part of a rounded judgements. However, concerns have been raised about the quality of the core metrics and their ability to support complex and high stakes judgements of excellence. An Office for National Statistics (ONS) review of TEF data sources uncovered several areas of concern related to robustness of data sources used in the TEF, primarily the NSS and DLHE, and made recommendations for how these might be addressed.<sup>10</sup> Among other recommendations, the ONS made recommendations that have yet to be implemented in the TEF:

- the need for the TEF to define target populations in respect to data based on surveys (ie NSS and DLHE)
- that once defined, steps should be taken to ensure this target population is appropriately captured and representative (eg through weighting of data)
- the need to take steps to establish the effect of non-responses on both the NSS and DLHE, and consider imputation of these results should non-responses be found to be important

In its response to the first technical consultation on the TEF in 2016, the Royal Statistical Society (RSS) highlighted several areas of concern about the robustness of data used. Chief among these was a lack of evidence for any statistical association between core metrics (particularly NSS and employment outcomes) and teaching quality, how employment metrics were to be used and various assumptions about causality.<sup>11</sup> These concerns were reiterated in a letter sent to the DfE by the Office for Statistics Regulation and in the RSS's response to the 2018 technical consultation on subject-level TEF.<sup>12</sup>

### CHALLENGE 3: DIFFERENTIATION

A key part of the metrics-led approach is the use of benchmarking to enable comparison of providers while accounting for certain characteristics. The TEF metrics take into account student characteristics that are statistically correlated with a student's outcome, such as social background and subject choices, but which are unrelated to a provider's teaching quality. This system generates a flag when a provider exceeds or drops below an expected performance based on relative characteristics. As such this initial differentiation is based largely on:

- the data that is selected,
- the factors that are considered in the benchmark, and
- how statistical differences from expected performance are determined.

<sup>10</sup> Office for National Statistics (2016) *Teaching Excellence Framework: Review of Data Sources*

<sup>11</sup> Royal Statistical Society (2016) *Response to the Department for Business Innovation and Skills' Technical Consultation (year 2) on the Teaching Excellence Framework*

<sup>12</sup> Royal Statistical Society (2018) *Response to the Department for Education's Teaching Excellence and Student Outcomes Framework subject-level consultation*

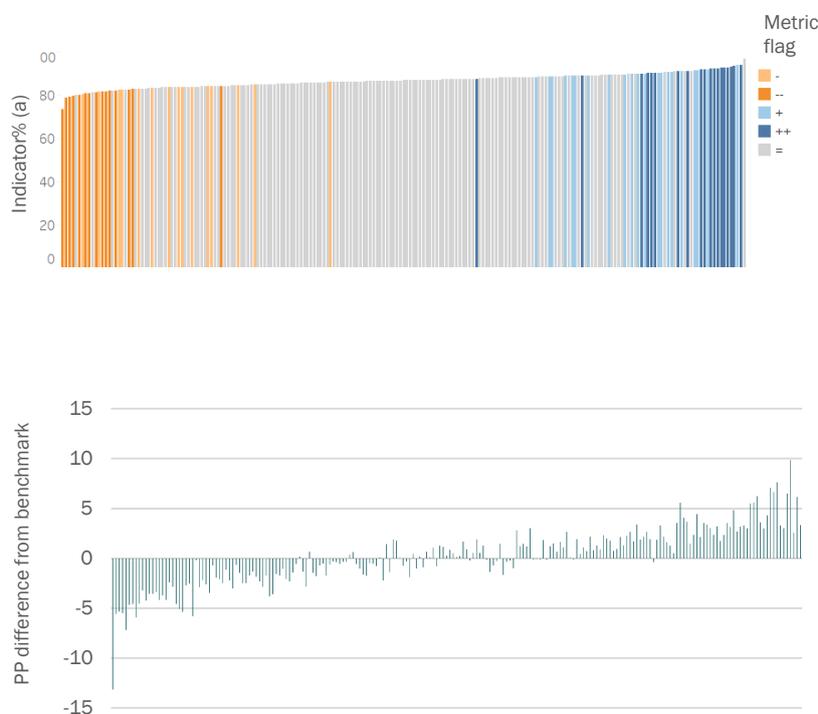
The development of the benchmarking methodology used in the TEF has prioritised differentiation between providers over the reliability of judgements. The methodology for flagging differences in the TEF has been built on methodology developed for the UK performance indicators (UKPI).<sup>13</sup> However, under the current TEF framework an institution will receive:

- a positive flag or negative flag where metrics differ from benchmarks by plus or minus 2 percentage points<sup>14</sup> and a z-score of plus or minus 2
- a double positive or double negative flag where metrics differ from benchmarks by plus or minus 3 percentage points<sup>15</sup> and a z-score of plus or minus 3

This contrasts with the UKPI where differences are only flagged as significant if they are greater than +/- 3 percentage points or a z-score of at least +/-3. The Royal Statistical Society has raised concerns about the TEF's use of lower levels of significance to produce differentiation between providers due to the risk of generating erroneous, 'false positive' flags.

FIGURE 7

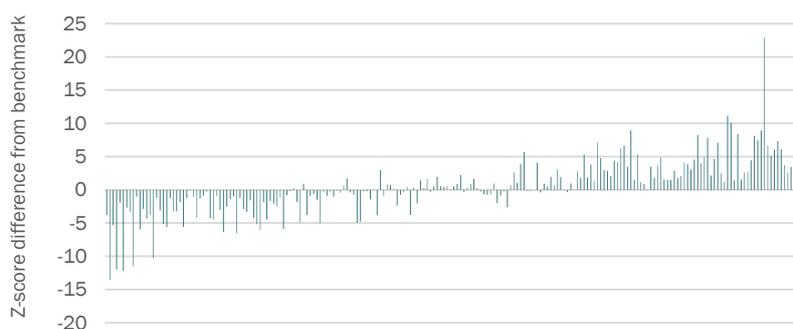
Differentiation of institutional performance in 'teaching on my course' metric and flagging parameters in TEF Year 2 metrics



<sup>13</sup> HESA (2018) *Benchmarks (applicable to tables T1 to T3, T7 and E1)*

<sup>14</sup> Unless the benchmark is above 97%, in which case the material difference is not considered as in this case, it would be impossible for some providers to receive a double positive flag.

<sup>15</sup> Unless the benchmark is above 97% in which case the material difference is not considered.



Source: OfS, TEF data

Figure 7 shows the distribution of institutional scores and the corresponding distribution of differences between indicator and benchmark for each institution based on percentage points and z-score.<sup>16</sup> In addition, a distribution of  $\pm 1$  percentage point and a z-score of  $\pm 1.645$ , equivalent to a confidence interval of 90% that is currently being tested by the OfS, is also included.

It also shows that in the case of this measure, there is a low level of actual variation between providers, with 82% of institutions scoring between 80% and 90%. In addition, two institutions with very similar indicator scores may have large differences in difference from benchmark depending on the approach taken to determining flags. For example, 10 institutions have received either positive or negative flags based on a z-score used in the TEF that would not be judged as statistically significant according to the UKPI method. An additional four institutions who currently do not receive a flag would do so if a narrower measure of  $\pm 1$  percentage point and a z-score of  $\pm 1.645$  (a confidence interval of 90%) that is currently being piloted was used.

#### CHALLENGE 4: DATA LAG

By focusing on outcomes, TEF judgements prioritise historical experience of previous students. This means that in some metrics, institutions are being assessed against old data that may not be relevant to a prospective student making their future study choices. In the case of the LEO data set, initial hypothesis will be calculated using data from students who left higher education as far back as 2009–10. For the 2018–19 subject-level pilots, each core and split metric will be calculated using the latest three years of student data available. Neither is data weighted toward more recent years when aggregated into the metric. This also means that in the case of four-year awards, students will be basing decisions on data that incorporates data that is between five years and potentially over a decade old. For each data source, the years of data that will be used in 2018–19 is listed in table 2.

<sup>16</sup> Based on responses to questions 1–4 of the NSS; agreement with the statements ‘staff are good at explaining things’; staff have made the subject interesting’; ‘the course is intellectually stimulating’; and ‘my course has challenged me to achieve my best work’.

TABLE 2

Years of data used by data source

DATA SOURCE	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
NSS								1	2	3
HESA/ILR(FT)						1	2	3		
HESA/ILR(PT)					1	2	3			
DHLE							1	2	3	
LEO	1	2	3							
OFS					1		2		3	

## CHALLENGE 5: COMPLEXITY OF JUDGEMENTS

As the TEF has developed, it continues to balance competing policy agendas, alongside definitions of excellence, and is increasing the complexity of judgements. To fit providers to one of three categories, assessors must now consider:

- the overall balance of core benchmarked flags that generate the initial hypothesis
- the balance between benchmarked and absolute values and splits by student characteristics
- two main supplementary metrics, including a grade inflation measure that is contextualised by entry qualification and regional information
- a provider's submission across the three learning areas, including a providers own data on outcomes and commentary on core and supplementary metrics

Policy agendas included in the exercise include, differential attainment and employability and grade inflation. These are captured by the split and supplementary metrics where the panel is asked to form balanced judgements of a university's performance in conflicting areas.

## REGIONAL EMPLOYMENT

There is a tension between the regional mission of providers that may attract local students and supply skills to a local area, and graduate salary outcomes that are highest the London and the South East. Regional variables are an important factor in the employment outcomes of graduates at a provider level, with graduate starting salaries shown to vary by region from an average of £19,999 in Wales to £24,357 in London. Similarly, in its own analysis,<sup>17</sup> the DfE found that students were more likely to be in highly skilled employment or further study if they lived in certain regions such as the South East or East Midlands before studying.

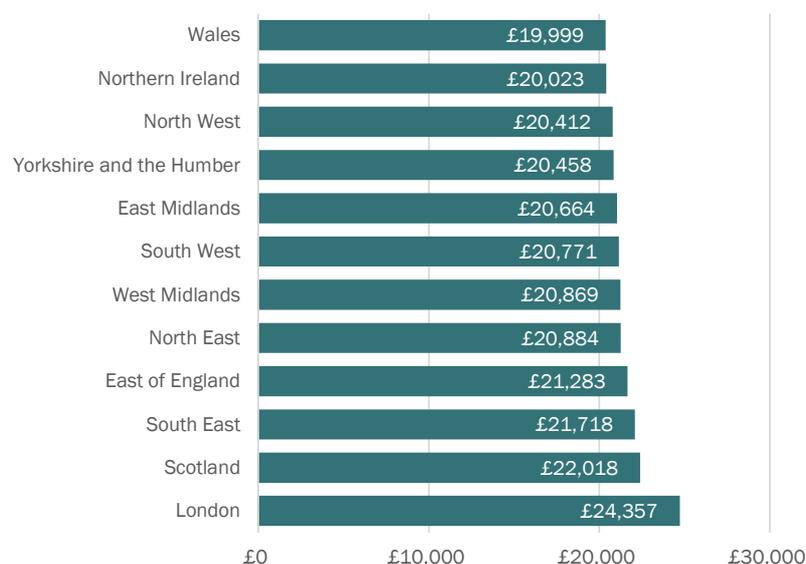
<sup>17</sup> DfE (2016) *Teaching Excellence Framework: analysis of highly skilled employment outcomes*

Accurately accounting for regional variations when comparing providers is complex. When developing the TEF's highly skilled employment metric, research commissioned by the DfE recommended additional benchmarking factors should be included in UKPI employment metrics.<sup>18</sup> Some of these, such as POLAR quintile and disability, were subsequently included while others, most notably the region of domicile, were not. The research also found that employers' perceptions of institutional reputation were statistically associated with outcomes for this metric, suggesting that this may influence employment metrics.

A benchmark for the TEF is complicated by differing missions of providers in similar locations, resulting in various geographical recruitment patterns and onward employment. In the absence of benchmarking methodology in the TEF that captures this complexity, assessors and panellists have been provided with additional data for each provider to aid in interpretation of core and supplementary metrics. This includes maps covering where an institution's students are from and where they go on to find employment, and regional employment information for the UK population.

FIGURE 8

## Average starting salary



Source: HESA (2017) Destinations of Leavers of Higher Education Record 2016–17

<sup>18</sup> DfE (2016) *Teaching Excellence Framework: analysis of highly skilled employment outcomes*

## GRADE INFLATION AND ATTAINMENT GAPS

There is potentially a tension between the TEF's agenda for incentivising improvement in teaching and learning and the presumption of improvement in grades being an indicator of inflation. This is particularly problematic in the context of the wider policy agenda to close attainment gaps. Panels are also presented with supplementary data on the proportion of upper degrees being awarded by an institution with an assumption that any increase is evidence of inflation. In response to concerns about the crudeness of this measure, the OfS is currently testing a contextualised benchmark that takes into account prior attainment of students.

The UUK report 'Degree classification: transparent, consistent and fair academic standards' has found there is a risk that inflationary factors have contributed to the upward trend of the last 10 years.<sup>19</sup> However, the definition of grade inflation is the subject of debate within the higher education sector and beyond. The UUK study also found that characteristics, such as prior attainment of students and improvement in teaching practice also affect the upward trend of data. While the TEF may encourage providers to examine and justify their evidence in relation to upward trends in data, there is not yet evidence that panels are equipped to interpret data or that they contribute to effective judgement of teaching excellence.

In response to concerns about the upward trend in upper degrees, UUK is working with the UK Standing Committee for Quality Assessment to develop a package of recommendations that can support collective sector action to protect the value of qualifications over time. These proposals include:

- undertaking a review of practices and data at institutional level and published in a degree classification statement
- explaining the design of degree algorithms, including where these diverge from sector norms
- supporting the professional development of external examiners
- agreeing and using common criteria for degree classification as a reference point for institutional practice

## CHALLENGE 6: SUBJECT-LEVEL TEF

The introduction of subject-level TEF will exacerbate many of the challenges described above. There are currently 37,000 higher education courses rather than the approximately 150 higher education institutions with provider level TEF awards. Subject-level assessment exacerbates the challenges associated with data quality and statistical differentiation and will significantly increase the complexity and volume of assessment. At the same time subject groupings do not align with the actual structure of the academic programmes, departments and schools in the institutions where students are taught

<sup>19</sup> Universities UK (2018) *Degree classification: transparent, consistent and fair academic standards*

and may undermine interdisciplinary programmes, innovation and smaller subjects.

As has already been highlighted, it is the government's intention to move to a subject-level TEF in 2020–21. Subject-level TEF was first piloted concurrently with Year 3 of the TEF and will run concurrently with Year 4 prior to a full introduction planned for Year 5 in 2020–21. In 2017–18, two models of the TEF were piloted with around 50 providers. Both models used the second level of the Common Aggregation Hierarchy (CAH) to group courses into 35 assessed subject areas. The main assessment framework was based on that operating at provider level. A new metric, teaching intensity, was tested alongside these pilots.

#### **MODEL A – BY EXCEPTION**

This model considered incidences where subject-level metrics deviated from those of the provider. Metrics for subject which led to an initial hypothesis different to that of the provider were considered as an exception (unless the changed hypothesis resulted from subject-level metrics changing to neutral from positive or negative at provider level).

#### **MODEL B – BOTTOM UP**

This model assessed and provided ratings for all subjects. These were then considered along with the provider-level metrics and submission to also generate a provider level rating. Although providers were given metrics for all relevant 35 CAH2 subjects, these are further grouped into 7 subject areas for assessment and submission.

The outcomes of the first year of the pilots, the results of the consultation, the Government's response both and plans for the second year of the pilots was released in October 2018. In its response DfE concluded that neither of the models trialled in the first-year pilot were able to deliver robust assessments and stated that 'given the importance of accurate subject information to informing student choice, the additional robustness generated by the fuller assessment is clearly necessary.' As a result the next round of piloting will combine both models:

- a. Providers receive their provider and subject-level metrics and contextual data, against which the initial hypothesis for panel judgements are made.
- b. Providers prepare a 15-page provider-level submission for the provider-level assessment. They also prepare a common single two-page provider summary statement and a separate five-page submission for each subject (the CAH2 classification of subjects is currently being used, which contains 35 subject groupings).
- c. The main panel (for provider-level) and subject panels (for subject-level) assess the evidence against the criteria. The outcome is a rating and a statement of findings.

Significant concerns about subject-level assessment persist under the combined model.<sup>20</sup> The classification of subjects still does not provide a sound basis for comparing subjects. None of the UUK members who participated in the pilots that we surveyed (20 institutions) felt that the CAH2 classification properly represented their subject mix or profile and this has not been resolved by the combined model. Similarly, research conducted with prospective students on behalf of the DfE has highlighted that when using the proposed subject classification, some students struggled to correctly identify the subject class in which their chosen subject of interest would fall, which was especially true of certain subject area.<sup>21</sup>

A subject submission is required for every subject that is being assessed; that is, every subject that is in scope and has enough data for assessment. To be reported, a subject must have reportable metrics for two or more of NSS, continuation and employment outcomes. A cohort threshold of 20 or more per subject will be tested that aims to maximise the coverage of core metrics. This means that:

- 98% of students will be covered by reportable metrics
- 87% of providers will still report having at least one subject with non-reportable metrics
- 27 subject areas will have at least 20% of providers with a non-reportable core metric(s)<sup>22</sup>
- the risk risks associated with data quality and ‘false positives’ due to random fluctuations will be increased

Providers will be eligible to submit an optional extra page of quantitative information relating to part-time students. Single-subject providers will submit a subject submission plus provider summary statement. Therefore, a provider who submits the maximum possible number of submissions of the maximum allowed length, would provide 193 pages of information: 15-page provider-level submission + two-page provider summary statement + 35 x 5 = 175 pages of subject-level submissions + one-page submission on part-time students.

The complexity of comparable judgements is likely to increase given the potential inconsistency in the data and the volume of submissions. Although not all providers will submit a full submission across all subjects it is estimated that there will be in the region of 4000 submission for the full exercise. Up to now, each TEF exercise has been completed within a single academic year. However, given the scale of the first full subject-level TEF exercise, it will be conducted across two academic years, 2019-20 and 2020-21. This will ensure additional time for providers to make submissions and for panels to conduct the assessments.

<sup>20</sup> UUK (2018) *Universities UK response to subject-level TEF technical consultation*

<sup>21</sup> DfE (2018) *TEF and informing student choice: subject-level classifications, and teaching quality and student outcome factors*

<sup>22</sup> DfE (2018) *Teaching Excellence and Student Outcomes Framework: subject-level (Government consultation response)*

## POTENTIAL COST OF SUBJECT-LEVEL ASSESSMENT

At this stage, it is not possible to make an accurate estimate of the costs likely to be incurred by providers in this process. For example, the OfS has provided two estimates of how many submissions this would entail and how much it would cost. Their first estimate includes all English providers with more than 500 students in their TEF Year 3 contextual data (229 in total). This equates to 3,453 submissions and a total cost of £15.9 million (£69,000 per provider). Their second estimate includes all UK providers with suitable provider metrics for TEF year 3 (426 in total). This equates to 5,102 submissions and a total cost of £23.8 million (£56,000 per provider).

UUK has also created rough estimates of submissions and costs for subject-level TEF from the estimate of costs for Year 2 TEF. This estimate extrapolates from the number and the cost of days worked per institution and the number of pages submitted by a provider. This equates to a total cost of £37.6 million (£246,000 per provider). It is important to note that this is a rough estimate based on extrapolation of cost / time data, so should not be relied on, especially as there is no guarantee that institutions will choose to submit subject-level TEF returns for every subject that they can. This estimate does not capture any ongoing investment made to support future TEF submissions that was reported by just over 80% of responses to the UUK TEF year 2 survey.<sup>23</sup>

## 5. THE TEF AND STUDENT CHOICE

TEF is relatively new in terms of influencing student choice and is yet to demonstrate its value to student decision-making in the context of the wider student information landscape. Only one round of students entering academic year 2018–19 have had access to a full set of awards. When considering the whole applicant pool, 3% of all January deadline applicants in 2018 knew what the TEF was and found the awards extremely important when deciding where to apply. A further 7% of all applicants found the TEF awards important, and 5% said they were slightly important.

Prior research by HEFCE on student decision-making suggests that students are likely to continue to rely on a range of information when making decisions, including informal sources of information and advice. University websites are likely to remain the main source of information for students about courses while filtering their potential choices through a range of categories, including location and entry criteria.

<sup>23</sup> These estimates assume that every higher education institution in the UK (excluding Scotland) provides a TEF return, with the number of subject-level submissions varying by institution (i.e. one return for specialist institutions, the full 35 subject-level returns for 50% of the remaining institutions, and 17 subject-level returns for the other 50% of remaining institutions).

Priorities for students in decision-making include:

- academic criteria and reputation
- cost of living, availability of accommodation, and location
- course content and outcomes
- future employment objectives
- personal fit and feel

It is not yet clear that the TEF is making a positive contribution to student decision-making beyond adding an additional layer of information to existing sources such as university websites and league tables. This is of concern as additional sources of information does not necessarily better inform students and can create confusion. For example, research conducted by a group of students' unions found that of existing students, 11% of students from an ethnic minority background say that they would have reconsidered applying or not applied to their university if it had been rated gold, compared to only 5% of white ethnicity students.<sup>24</sup> Risks associated with the TEF include:

1. simplification of complex data not understood by the student
  - this is particularly relevant if the award is used to guide choices that may not align with the priorities or needs of a student
2. additional information adding to a data overload for students
  - this is particularly problematic if the award replicates information that is already being presented to students in different formats

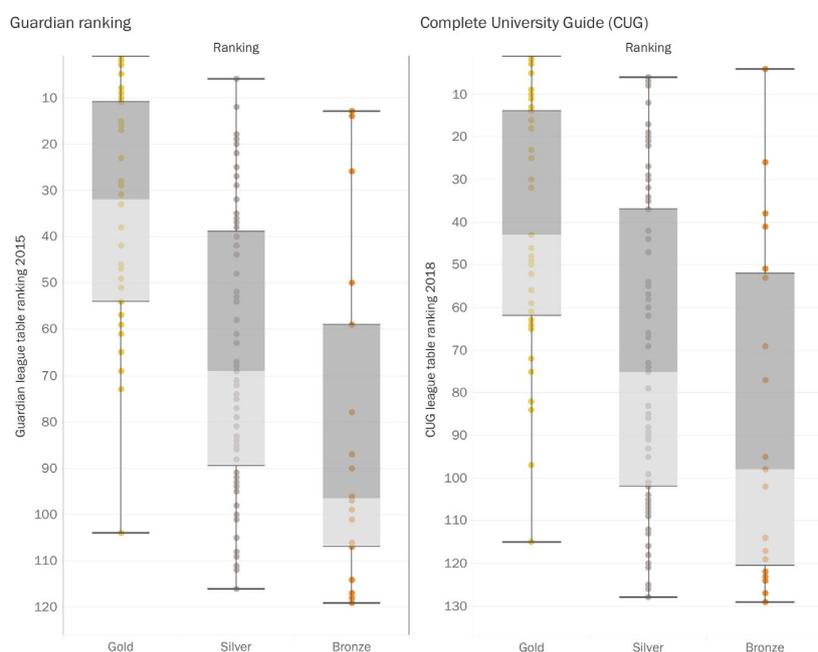
Existing student information sources use data that is included in the TEF plus other selected data sets at course level, as does Unistats and providers' websites (see table 3). The main difference lies in how the TEF uses the data, benchmarking against a range of factors plus provider submission and panel judgement instead of creating a university ranking system. The Unistats website allows students to compare selected courses using a customisable set of data, while the main ranking tables allow students to rank institutions by selected data. At institutional level, as similar data is being used for the TEF and league tables, they produce broadly comparable results, as illustrated in the following chart.

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<sup>24</sup> Trendence UK (2017) *Teaching excellence: the student perspective*

FIGURE 9

Ranking in the a) Guardian 2015, b) Complete University Guide 2018 for institutions as a function of TEF Year 2 outcomes



UUK (2017) Review of the teaching excellence framework year 2

Provider-level TEF judgements are presented on all the league tables, Unistats, the UCAS website and provider websites. Of the 135 higher education institutions with TEF ratings, 93 (69%) mention the rating on their website. It appears on the home page of the websites of 67 institutions (50%). The likelihood of universities using their TEF rating varies depending on which rating they received. Of the 52 institutions that were rated gold, 47 mention it on their website, and 37 on the home page. However, of the 15 institutions that were rated bronze, only one mentions it on their website, and none on the home page.

Nevertheless, the emerging research shows that the TEF may play a role in student decision-making as found by UCAS.<sup>25</sup>

- Among applicants who knew what the TEF was, almost all knew the TEF rating awarded to at least some of the providers they applied to, and three in every five said the award was important, or extremely important, when deciding where to apply.
- Among applicants that did not know what the TEF was, three out of every five said they would have found the awards important, or extremely important, had they known about them.
- Applicants who knew about the TEF before applying made more applications, on average, to gold award providers, compared to applicants who did not know about the TEF.

<sup>25</sup> UCAS (June 2018) *The Teaching Excellence and Student Outcomes Framework (TEF) and demand for full-time undergraduate higher education*

- Similarly, applicants who said the TEF awards were important when deciding where to apply, made more applications to gold award providers, on average, than those who said they were not important. These patterns were found to exist after controlling for other factors that affect where applicants apply.
- Between 2011 and 2017, there was a steady increase in the share of applications to providers subsequently awarded gold ratings. These trends continued into 2018, after the publication of the TEF Year 2 outcomes. Differences between a provider's observed share of applications, and what might have been expected given these trends, were found to not be related to the TEF awards.

TABLE 3

Comparison between sources of information on teaching quality

SOURCE	DATA USED	HOW THE DATA IS PRESENTED
TEF	<p>Benchmarked performance against:</p> <ul style="list-style-type: none"> <li>• teaching on my course</li> <li>• assessment and feedback</li> <li>• student voice</li> <li>• academic support</li> <li>• learning resources</li> <li>• continuation</li> <li>• highly skilled employment or higher study</li> <li>• sustained employment or further study</li> <li>• above median earnings threshold or higher study</li> </ul> <p>Provider submission. Panel judgement.</p>	<p>Students can see universities gold, silver or bronze rating and can also access additional narrative judgment.</p> <p>Data is presented on different platforms.</p>
Unistats	<ul style="list-style-type: none"> <li>• DLHE survey</li> <li>• LEO dataset</li> <li>• Course accreditation</li> <li>• Entry requirements</li> <li>• UCAS Tariff point</li> <li>• NSS: <ul style="list-style-type: none"> <li>• the teaching on my course</li> <li>• learning opportunities</li> <li>• assessment and feedback</li> <li>• academic support</li> <li>• organisation and management</li> <li>• learning resources</li> <li>• learning community</li> <li>• student voice</li> </ul> </li> <li>• TEF award</li> </ul>	<p>Students can compare selected courses in five areas:</p> <ol style="list-style-type: none"> <li>1. customised selection of data</li> <li>2. student satisfaction</li> <li>3. employment &amp; accreditation</li> <li>4. continuation &amp; degree results</li> <li>5. entry information</li> </ol>

Guardian league tables	<ul style="list-style-type: none"> <li>• Entry qualifications</li> <li>• Student satisfaction: <ul style="list-style-type: none"> <li>• satisfied overall</li> <li>• satisfied with teaching</li> <li>• satisfied with feedback</li> </ul> </li> <li>• Student-to-staff ratio</li> <li>• Value-added score</li> <li>• Graduate careers</li> <li>• Spend per student</li> </ul>	Students can rank universities / courses by selected measures.
Complete University Guide	<ul style="list-style-type: none"> <li>• Entry qualifications</li> <li>• Student satisfaction</li> <li>• Student-to-staff ratio</li> <li>• Completion</li> <li>• Degree classifications</li> <li>• Graduate careers</li> <li>• Research quality</li> <li>• Research intensity</li> <li>• Academic services spend per student</li> <li>• Facilities spend per student</li> </ul>	Students can rank universities / courses by selected measures.
The Times and Sunday Times	<ul style="list-style-type: none"> <li>• Entry qualifications</li> <li>• Student satisfaction</li> <li>• Student-to-staff ratio</li> <li>• Completion</li> <li>• Degree classifications</li> <li>• Graduate careers</li> <li>• Research quality</li> <li>• Services and facilities spend per student</li> </ul>	Students can rank universities / courses by selected measures.
Provider website (HEFCE 2017) <sup>26</sup>	<ul style="list-style-type: none"> <li>• Introductory course information (length, award)</li> <li>• Entry requirements</li> <li>• Course structure and delivery (learning outcomes and approach)</li> <li>• Module information</li> <li>• Teaching and learning (classroom and independent learning)</li> <li>• Assessment and feedback</li> <li>• Costs and financial support</li> <li>• Key information set (Unistats)</li> </ul>	University website as material information for students.

\* Percentages sum to 30% as teaching accounts for 30% of the overall THE ranking

\*\* TEF ratings are also provided within a university's profile, but it is not included in the main league table

## 6. THE TEF AND INSTITUTIONAL BEHAVIOUR

As with student behaviour, it remains early to evaluate the impact of the TEF on institutional practice and student outcomes. Early evidence indicates institutions are making decisions in response to the framework, including prioritisation of teaching and learning strategies and enhanced monitoring of institutional TEF metrics, including split metrics and associated benchmarking.

- Steps taken since 2015 included 81% of respondents undertaking additional investment in teaching and learning; 70% updating strategies for employability or enhancing engagement with employers; 60% reporting additional investment in teaching and learning; 40% incorporating core TEF metrics into key performance indicators; and 40% incorporating core TEF metrics into key performance indicators.
- However, no respondents indicated that they had initiated a new programme of activity specifically to respond to the TEF; 22% said they had reviewed existing proposals to take account of TEF and 26% stated that they had accelerated existing changes. The other 52% stated that the changes they made since 2015 had already been planned and the TEF has had no impact.
- There was large agreement among respondents as to whether the TEF would enhance the profile of teaching and learning with 73% agreeing and only 6% of respondents disagreeing.

What is not yet clear however is the extent to which these impacts are likely to translate into enhancement of teaching and learning practice. For example, only 29% agreed that the TEF would enhance teaching and learning practice (29% agreed) and accurately assess teaching and learning excellence (2% agreed). Areas of concern included:

- a focus on monitoring core metrics that do not support the enhancement of teaching and learning practice
- the extent to which the competitive nature of exercise will support or hinder collaboration and sharing of practice between institutions
- the potential for risk aversion and pressure toward a uniform approach to learning and teaching

## 7. THE FUTURE DEVELOPMENT OF THE TEF

The design of the TEF as a way for comparing a range of providers serving a diverse set of students is a complex task. Its development has been shaped by several policy agendas and the associated trade-offs between different perspectives of excellence, differentiation and reliability of judgements, and a streamlined manageable process. Crucially, these design trade-offs have shaped the TEF's definition of excellence, articulated through the assessment framework, including the metrics-led assessment algorithm and the associated panel judgement. Furthermore, the TEF is influencing, either directly or indirectly, institutional strategies and behaviours. Reported direct and indirect impacts of the TEF to date include:

- increased strategic priority and visibility of teaching excellence
- greater emphasis on teaching in professional progression
- enhanced focus on core outcome metrics and an institution's own data
- a focus on policy agendas, including differential attainment and employability

The impact of the TEF on teaching and learning practice across the sector makes it essential that the TEF is well designed and supports positive teaching and learning outcomes for students. However, the increasing complexity of the TEF process risks undermining its clarity for students and its role in supporting enhancement of teaching and learning. Concerns about the TEF to date include:

- a definition of excellence that is weighted more heavily towards employment outcomes than the wider benefits of teaching and learning for students and society
- a metrics-first methodology that prioritises differentiation over reliability, and where some data is nearly 10 years old and irrelevant to prospective students or the enhancement of teaching learning
- an incremental and piecemeal process of making changes to the TEF that has increased the complexity of judgements that are unlikely to be properly understood by students
- a proposed subject-level methodology that will exacerbate all these problems at a significantly increased cost and with limited evidence of its value to students who already use a range of similar information sources to make their decisions

The TEF should be a tool that helps students find the right place of study for their own academic and personal needs, while helping to enhance teaching and learning practice across the whole sector to the benefit of students, society and the economy. Therefore, a successful TEF would:

- engage and support the development of excellent teaching and learning practice across the sector in a way that reflects the diversity of student needs and the social and economic needs of wider society
- act as a strategic aid to different government policy agendas in higher education, including employability, by supporting the enhancement and impact of academic practice and the long-term quality of the sector
- be an effective and efficient exercise that provides a clear framework that supports the work of universities, and recognises and sets appropriate limits on its objectives and scope in the context of competing stakeholder priorities

An effective TEF must be founded on an assessment method and awards structure that allows institutions to demonstrate the impact that they have had on their students while accounting for diversity of background and context. To support the development of the TEF in the long term the following practical risks will need to be addressed:

- the potential that the TEF becomes dominated by competing institutional and government definitions of excellence that fail to engage with the diversity of student interests, teaching and learning practice and needs of wider society
- the use of statistical data to inform high-stakes judgements that will incentivise a narrow targets culture across the sector to the detriment of the range and richness of academic practice and the long-term quality of the sector
- the need to consider more fully how institutional evidence can inform comparative judgements on teaching excellence and the impact on students in ways that support the enhancement of teaching and learning practice across the sector
- the complexity of formulating understandable and reliable comparative judgements using complex data and the inherent limitations of award scales that won't be resolved by changes in names or amending the number of tiers on offer

## 8. RECOMMENDATIONS

The core aims of the TEF should be focused on supporting student choice and the enhancement of teaching and learning. To achieve this aim, UUK recommends a series of steps for the future development of the TEF.

### THE GOVERNANCE OF THE TEF SHOULD BE CLARIFIED TO GIVE STUDENTS AND THE SECTOR A CLEAR STAKE IN DECISION-MAKING

1. The governance of the TEF should be clarified to ensure the TEF develops in a way that is consistent with its core aims and avoids piecemeal changes that undermine its coherence and clarity for users. Governance should:
  - a. include enhanced student and sector input into strategic TEF decision-making, including input from the devolved administrations as appropriate
  - b. help to inform government, the OfS and sector priorities in relation to teaching and learning, student outcomes and the TEF
  
2. The future design of the TEF should be based on a predictable cycle. The findings from the independent review should be followed by an ongoing cycle of review that aligns with the period of award duration. Each review cycle should consider:
  - a. whether the burden of the exercise is proportionate
  - b. whether the exercise is delivering against its core aims
  - c. the impact of the exercise on institutions, students and the sector as a whole
  - d. whether the priorities and design principles are suitable for the future iterations of the TEF
  
3. The core aims of the TEF might be augmented with cyclical themes focused on outcomes that are relevant to students and government. Each iteration may focus on a different theme, such as the current focus on employment outcomes. These themes may evolve or change but should not be accumulated.
  
4. The use of the TEF should be linked to its core aims of supporting choice and enhancing teaching that recognises the limitations of TEF judgements. Governance of the TEF should also play a role in advising on:
  - a. the definition of a 'high-level quality rating' to support differential fees by inflation under schedule two of HERA
  - b. the use of the TEF to support other forms of fees or funding differentiation, regulation or policy
  - c. the appropriate use of the TEF by UK government, the OfS or devolved administrations

## THE TEF SHOULD BE FOUNDED ON RELIABLE JUDGEMENTS THAT REPRESENT A SHARED DEFINITION OF TEACHING AND LEARNING EXCELLENCE

5. The TEF should retain a broad approach to assessing teaching excellence that seeks to capture the value and impact of teaching and learning across the diversity of students and institutions. The assessment process should move from a metrics-led to a metrics-informed assessment process that reflects the relationship between teaching, independent learning and wider social and economic contexts.
6. The TEF should not be a narrow tool for incentivising student employment outcomes to the detriment of the breadth and richness of higher learning. The overall weighting of employment and salary measures should be reviewed, including the use of historic LEO data.
7. There should be a high bar for the inclusion of new core and supplementary metrics. Metrics should be founded on sound data and statistical methodology that is focused on reliable assessment of the impact of teaching and learning, rather than differentiation between providers. Geographical factors should be considered in employment metrics and panels should have access to absolute and benchmarked measures for all metrics.
8. The OfS should work with the sector to examine ways of developing methods for evaluating, evidencing and comparing student outcomes and the impact of teaching in support of TEF judgements and enhancement of institutional practice. This should build on the learning gain pilot programme and the variety of methods that are now in development.

## THE INTRODUCTION OF SUBJECT-LEVEL TEF SHOULD BE RECONSIDERED

9. Subject-level assessment should not proceed until the limitations of the methodology, its costs to universities and the taxpayer and the actual value of its contribution to student decision-making have been fully considered. This should include considering how the aims of subject-level TEF can be delivered through the wider student information landscape, including Unistats, material information on provider websites and league tables, and other tools.

## ANNEXE A: ASSESSMENT OF FORTHCOMING POLICY LANDSCAPE

### INSTITUTIONS

AREA OF CHANGE	DESCRIPTION	POTENTIAL IMPACT UPON INSTITUTIONS
New regulatory regime	The OfS became the new regulator of higher education in England on 1 January 2018 following the passage of the HERA.	<p>Increased burden of adapting to new regime. Risk of ongoing increased burden. Reduced financial safety net.</p> <p>Potential for reduced access to additional funding streams to support innovation.</p> <p>Increased focus on student outcomes, choice and demonstrating value for money.</p>
Increased competition	<p>New regulatory environment aims to make it easier for new providers to obtain degree awarding powers.</p> <p>Demographic changes mean that there will be a decreasing number of 18-year-olds until 2020.</p>	<p>Difficulty in maintaining current UK student numbers and any growth targets which may be reliant on this.</p> <p>Financial sustainability may become increasingly reliant on attracting International (both non-EU and EU) students where opportunity for growth is larger.</p>
Post-18 review of education and funding	The government is currently undertaking a review of the post-18 education and funding landscape which is likely to report initial findings in Autumn 2019.	Impact unclear as review has yet to report but increased uncertainty surrounding long term funding environment.
The UK's exit from the European Union	The UK is set to leave the European Union at the end of March 2019. There is still uncertainty surrounding the UK's continued participation in schemes such as Horizon 2020 and Erasmus+ and their successors. The UK is also expected to introduce new immigration legislation which will likely impact the recruitment of both EU and non-EU staff and students.	<p>Impact unclear as a final deal has yet to be agreed and no immigration legislation has yet been proposed by government.</p> <p>Risk of decreased collaboration with European partners.</p> <p>Small opportunity to obtain more favourable immigration rules for international students, but real risks that the pipeline of EU staff, particularly early career researchers and technical staff will be severely reduced.</p>

## GOVERNMENT

GOVERNMENT POLICY PRIORITIES WITH IMPACT ON HIGHER EDUCATION	DEPARTMENT FOR EDUCATION	DEPARTMENT FOR BUSINESS, ENERGY AND INDUSTRIAL STRATEGY	TREASURY
Value for money	Post-18 review of education and funding.	Next Research Excellence Framework.	Spending review and cost of the student loan book including fiscal impact of changes to accounting treatment of student loans.
Student outcomes	Availability and usage of LEO to monitor institutional and subject performance and rate of return to secure a sustainable funding settlement for the sector.		The value of investment in higher education including the return of investment on student loans and wider economic benefits.
Student choice	Encouraging student choice through the availability of comparable information.  Encouraging students to consider non-higher education routes where these would be better suited.		Apprenticeship levy.
Industrial strategy	Implementation of post-16 technical education reforms.  Focus on tech education and level 4 and 5.	Research and development spending target of 2.4% of GDP.  National and local skills priorities.  Sector deals.  Local industrial strategies.	UK productivity.
UK's exit from the European Union	EU staff and students.	Access to research framework programmes.	Fiscal impact of exiting the European Union.  Cost of access to / replacement funds for European programmes.

## ANNEXE B: EVALUATION OF THE CURRENT ASSESSMENT FRAMEWORK AND PROCESS INCLUDING AN EVALUATION OF THEIR STRENGTHS AND WEAKNESSES

	DESCRIPTION	STRENGTHS	WEAKNESSES
ASSESSMENT FRAMEWORK	Three aspects of quality:	Metrics allow providers to be assessed on a comparable basis.	Metrics used widely recognised to be proxy measures rather than direct measures of teaching excellence.
Criteria	<ol style="list-style-type: none"> <li>1. teaching quality</li> <li>2. learning environment</li> <li>3. student outcomes and learning gain</li> </ol>	Core metrics based on well-developed datasets which are collected based on agreed standards.	Metrics related to the student outcomes and learning gain aspect focus on employability outcomes rather than measures of non-employment outcomes or learning gain.
Core metrics	Each of these aspects consist of several criteria against which the performance of the provider is assessed.	Contextual data and split metrics provide a richer set of data about the university performance to enable a more rounded panel judgement.	Contextual data, absolute and split metrics Increased the volume and complexity of information for the panel to weigh and interpret.
Contextual and split data	Set of six core comparable metrics for all providers. Two of each relate to one aspect of teaching excellence.	Outcome metrics encourage institutional and sector focus on ensuring good outcomes for all students, including underrepresented groups.	The same set of split metrics were not always available for all providers or courses.
	Panels members are given sight of sub-level splits of core metrics by student characteristics, absolute scores for core metrics and the geographical context of an institution.		Considering geographical context, including weaknesses in benchmarking of the DLHE survey, alongside institutional characteristics was complex.

	DESCRIPTION	STRENGTHS	WEAKNESSES
<b>ASSESSMENT PROCESS</b>	Process for forming an initial metrics-based award outcome.	Benchmarking and flagging allows interpretation of provider metrics based on student and subject characteristics.	Approach taken to identify statistical differences between metrics and benchmarks is likely to overrepresent tangible differences in performance to produce differentiation.
Initial hypothesis			
Provider submission	Additional evidence presented by universities as appropriate, to inform judgements.	Provides a clear process for weighing core metrics and flagging differences from benchmarks to provide an initial hypothesis.	Flaws in the sensitivity of POLAR metrics with consequent impact on the accuracy of the benchmark.
Panel judgement			
Awards	Rounded judgement of core metrics and provider submission.  Three main award categories; gold, silver and bronze with a provisional category for providers with insufficient data.	Provider submission encourages consideration of providers own evidence in line with its institutional missions and practice.  The panel judgement is a formative process of considering and articulating an institution's teaching and learning impact.  Providers submission produces an in-depth resource for panel and sector to define and judge excellence and identify trends in practice.  Submissions enable the panel to identify where institutions have clearly integrated strategies and ethos for teaching and learning.  The panel process produces a sector dialogue about excellence and builds knowledge about institutional practice.  Small number of categories with easy-to-understand names.	Benchmarking does not factor in the effect of mode of delivery, geography or term-time residency of students on outcomes.  Complex method based on combination of material and statistical differences from benchmarks (based on z-scores) and high / low absolute values to produce a series of flags. Various splits with respect to student groups are also considered.  While considered an 'initial hypothesis', certain combinations of flags can limit a provider's ability to improve from an initial rating of bronze or silver.  Restrictions on submission length did not necessarily lower burden or intensity for provider.  Difficulty in assuring comparability and integrity of data that is presented by providers in support of impact.  Variability in quality of written submissions across the sector, particularly between higher education institutions and further education colleges.  Intensive process for judging institutional performance across a diverse sector.  Weighing multiple points of evidence equally and fairly in panel judgements is a complex exercise.  Potential tensions between nuance of complex discursive judgement and transparency at individual levels.

## ANNEXE C: CONTRIBUTORS

This report has been developed with the input of a range of individuals from across the sector, for which the report's authors are grateful, including the following individuals and groups. These individuals or groups do not necessarily endorse all the findings and recommendations of this report.

- Participants in Centre for Global Higher Education joint workshop with Universities UK 15 May 2018
- Professor Debra Humphris (Chair UUK Student Policy Network)
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- Professor Ian Dunn
- Professor Jackie Labbe
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- Professor Lorna Milne
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- Universities UK Student Policy Network

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