

Response ID ANON-TWMW-TNPJ-B

Submitted to **Independent Review of TEF: Call for views.**

Submitted on **2019-03-01 12:51:21**

Who are you?

1 What is your name?

Name:

Prof. Gina Wisker for Heads of Educational Development Group

2 What is your role/position (if relevant)?

What is your role/position (if relevant)? :

Member of Heads of Educational Development Group

3 What is your email address?

Email:

g.wisker@brighton.ac.uk

4 In what capacity are you responding to this consultation?

Other (please state)

If other, please specify below:

We are responding as an organisation representing Heads of Educational Development (I am collating our responses)

5 Are you responding on behalf of an organisation (eg. higher education provider, student union or representative group)?

Yes

a. If yes, what is the name of your organisation?:

Heads of Educational Development Group

Yes

6 Have you been involved preparing for or writing a TEF or subject TEF submission?

Yes

7 Have you been involved as a TEF assessor or panel member (for provider TEF or in the subject pilots)?

No

8 Would you like us to keep your responses confidential?

No

If yes, what is the reason for confidentiality?:

9 Please indicate which UK country/other country you are responding from.

Please indicate which UK country/other country you are responding for. :

UK-wide

If you are responding from a country outside of the UK, please write this in below.:

Why have TEF?

10 Do you support the aim of assessing the quality of teaching excellence and student outcomes across providers of higher education?

Yes

Please explain why:

Yes, we support the aim of assessing the quality of teaching excellence and student outcomes. Placing the status of Teaching Excellence on a par with Research Excellence is welcome and valuable across the sector for many in the research intensive sector which have traditionally privileged research over teaching and for non-research intensive institutions whose staff place a significant emphasis on teaching and improving the experience of all students. There is a need to assess the quality of teaching in higher education to ensure that there is parity of esteem with research the REF and other activities and that teaching and the student

experience are prioritised by universities. TEF offers a process that seeks to recognise, reward and further promote high quality and excellent learning, teaching, student experience and student outcomes. Assessing teaching excellence and student outcomes in this way is one of a number of tools to continually evaluate and enhance the student experience. It is welcome that institutions are seeking in different ways to set up and improve structures, policies and approaches (i) to measures and evaluate their teaching and (ii) to enhance teaching and student learning including for ALL students (with a renewed focus on participation and closing the attainment gaps among different groups of students).

However we feel that the TEF is an imperfect tool. It is not sufficiently nuanced and, although institutions are benchmarked, there is little evidence that this filters through to prospective students clearly, particularly students without the social capital to be informed about differences between universities. We do not seem to have a clear and shared definition of teaching excellence and we have yet to develop metrics around teaching quality that we can be confident in. TEF has the potential to support the enhancement of learning and teaching via national sharing of evidence and good practices. We do not feel it has an accountability role.

Why have TEF?

11 These purposes fall into two main areas: providing information, and enhancing the provision of higher education.

Enhancing provision

b. Please outline below the reasons for your answers :

Enhancing provision is more important than providing information, although both are helpful. However, there is little evidence to date that students are using the TEF information to assist in making decisions about where to study and – as with other sources of information for potential students – there is significant potential for it to be misunderstood or misused. TEF has shone a spotlight on T and L in a way that a series of calls over the last 20 years starting with the Dearing Report 1997 have been unable to do. However, enhancing provision of higher education is probably the hardest outcome to deliver via the mechanism of TEF.

Ultimately we want to ensure all students who choose to go into higher education have a positive, hopefully transformational learning experience. The principal value that TEF can bring is to increase the focus on supporting, developing and delivering excellent teaching and learning. TEF has provided a useful evidence base which could inform continuous improvement in L&T. There is little doubt that the TEF is motivating HEIs to give teaching and the student experience far greater focus, and this is to be welcomed. It helps to address a long-standing imbalance between research and teaching and if there is a REF, there should be a TEF. The TEF is ensuring that HEIs revisit the kinds of activities and priorities they wish to 'valorise' within their Promotions and Recognition system/policies, and this is also to be welcomed since it could be argued that academic staff who have focused primarily on teaching have been disadvantaged in terms of career advancement in the past.

The TEF could be an active tool for enhancing the quality of teaching and learning. If universities are to make real improvements and if the TEF is to be really meaningful, a 'sticking plaster' approach to enhancement must be avoided.

The purpose of provision of information for students, whilst relevant, is problematic as the model currently stands for a number of reasons. There is little evidence that TEF has proved a useful tool for informing applicants in making decisions regarding higher education choices. Research by UCAS has shown that no more than a fifth of applicants have used it to inform their choices, and that two thirds have never heard of TEF. Given the complex nature of HE provision and the increasingly diverse sector, it is problematic to try to reduce this to an overall single outcome from a choice of Gold, Silver or Bronze at provider level and the move to subject-level TEF and the provision of information at that level of detail does not wholly address the issue either. We have many misgivings about subject level TEF and urge that it be reconsidered. It aims to advise students about a provider's teaching quality in the subject they are looking to study, however, current subject groupings gather together a range of different courses with different outcomes which is potentially misleading to prospective students selecting a single course.

The TEF documentation (submission, statement of findings) and outputs is not currently prepared for a student-facing audience. As such, students might simply focus only on the 'colour' of the award and not the full range of associated information. How a provider is working towards continual improvement is arguably more important for prospective students than an award based on historic metrics. Furthermore, there is significant risk of the information being misleading to applicants:

- Currency: TEF metrics indicate the experience and outcomes of different student cohorts, often many years prior to that of prospective students.
- Granularity: Subject level TEF is intended to provide a more meaningful indicator of student experience, on the basis that individual experiences can vary across a provider's portfolio, but cannot be sufficiently granular to capture experience at the programme level, which is widely recognised to have most influence on student experience and outcomes.
- Validity: as noted in q14 TEF metrics are proxy indicators, chosen for their statistical robustness rather than their alignment with those factors which have greatest impact on student experience and outcomes.

Also there are potential tensions in the framing of students as market consumers or clients -- notwithstanding some of the language of partnership that the TEF assessors have been encouraging (a tension). More generally, it is arguable that efforts to create a market in higher education have had a number of perverse outcomes. Growth in marketing expenditure, aggressive competitive behaviour, and volatility in student numbers have all proved a detriment rather than an enhancement to the student experience and teaching quality.

One positive outcome of the process is the refocusing of HEIs to consider how to enhance their provision in meaningful ways that can be evidenced. However, there are clearly some limits to the enhancement that the TEF has encouraged – as it has been driven in the main by output metrics; many of which are not to do with teaching and learning quality per se, but a range of factors, some of which are outwith an individual HEIs control (e.g. local labour market conditions leading to possibilities for graduate level employment). The TEF has (purposefully?) redefined the purpose of HE towards a narrow skilled employment focus. There are no measures for example, of how good civic engagement and citizenship may result from HE – something which is key to the functioning of society which does not and should not fully centre around financial return. Is the TEF appropriately focused towards public interest ? this is doubtful.

12 Should there be any other purposes for TEF?

Should there be any other purposes for TEF? :

TEF could be a real driver of informed change, which could be very positive. TEF could – and arguably should – provide an option for universities who are highly successful in widening participation but who do not necessarily score highly in the traditional league tables – to emphasise their teaching strengths. I am not convinced that the exercise as set up currently truly enables this.

TEF should be used to align and map to the Access and Participation Plan and ensure that the objectives in the plan are reflected and met through a longer term

analysis of the TEF split metrics. This would offer a clearer link between the APP and TEF for the consumers of both, and could also support the Office for Students in delivering its role for sector-wide enhancement in relation to access and participation.

The TEF could be made even more useful as a measure of excellence by focusing on 'Value added' or 'Learning Gain'. These are two slightly different concepts, but address the same basic issue – the success of HEIs in taking students with weaker UCAS entry tariffs, or from WP backgrounds, and producing positive outcomes which compare favourably with those of students from more advantage backgrounds. The Guardian 'Value-added' score is a relatively blunt instrument, but might be nuanced in a future version of the TEF to ensure that HEIs who succeed in adding value for the most disadvantaged students are properly recognised via the TEF. The introduction of additional regulatory considerations to TEF, such as grade inflation, are indicative of mission creep and should be addressed via other mechanisms.

What is TEF?

How does TEF work?

13 Are the criteria used in TEF (see Figure 1 for a list of the criteria) appropriate?

Don't know

If not, what criteria would be more appropriate? :

The criteria across the three main aspects of quality are currently unbalanced. There are 5 criterion against Teaching Quality and 3 against Learning Environment and Student Outcomes. The metrics are also unbalanced against the aspects of quality with only 1.5 flags against Teaching Quality, 3 for Learning Environment and 3 for Student Outcomes. If TEF is truly concerned with teaching excellence then Teaching Quality with its 5 criterion should have more than 1/5 of the flags contained within it.

The chosen metrics (and I fear this would be the same for any set of quantitative metrics) risk setting in motion all sorts of perverse incentives for institutions -- leading to metric chasing, risk aversion above and beyond improving education for all our students. They also by their very choice (e.g. the reduction in importance of NSS -itself no doubt flawed) and the introduction of LEO data) lead to the privileging of particular types of institutions. Maybe over time the sector will invest in developing better ways of measuring the rather elusive notion of teaching excellence. However the challenge is massive both in terms of deciding what constitutes teaching excellence and developing a model fit to assess such a diverse range of HE providers and this challenge is further amplified with the introduction of subject-level TEF. The criteria used are (only)generally appropriate for assessing teaching excellence and student outcomes. The problem is that the metrics available do not map onto these criteria very strongly and despite the best efforts to avoid this, the exercise is still set up as primarily metrics-based. Writing to the criteria and writing to the metrics are not necessarily the same thing. For example, TQ4 aligns directly to a metric but TQ2 does not align to any of the metrics. SO3 (positive outcomes for all), should be aligned with access and participation data such that institutions which do not have 'all' students (as deemed by the contextual data) cannot therefore have positive outcomes for 'all students'.

There are also issues with assessing Learning Environment by the continuation metric. The What Works research acknowledges that measures to improve student retention and continuation are multi-faceted and could be argued are more related to Teaching Quality than the learning resources/environment. The qualitative evidence ie the narrative , while enriching is tricky – there is a perception that those who can tell a good story can improve their scores. Further, the qualitative evidence provided is often not rigorous, but can be based on anecdote and perception. Should there be expectations set about what constitutes appropriate qualitative data (as there would be in a rigorous research project).

If not, what criteria would be more appropriate?

A Value-Added score/metric could be of value in future iterations

Although there are some difficulties in measuring teaching excellence and learning gain, this should remain the longer-term aim of the TEF, rather than simply using employment and financial outcomes as a proxy. Currently there is too much emphasis on employability and employment, which does not take sufficient note of disciplinary differences, or location . For some disciplines it can take several years to gain a graduate level post and this is not a result of inadequate teaching. Equally not all graduates want to go into 'graduate-level' employment. Some are motivated by more altruistic careers. Excellent teaching does not inevitably lead to a graduate level career.

The current criteria appear to be reverse engineered from the available metrics rather than led by evidence of what has maximal impact on student experience and outcomes (see also comments on validity under q11).

A focus on employment type, earnings and further study may be impacted on by a range of factors beyond an institution's control, and narrowly redefines the purpose of HE. Institutions who build social and cultural capital in students are not rewarded for this... but this is one of the key ways in which students can develop and grow in the HE setting. This is of key importance for some WP cohorts in particular. Benchmarking does some way towards this – but it is a crude measure and cannot explore the journey that students undertake during their time at University and the added value (beyond qualifications and jobs) that an education can bring.

If TEF were able to introduce new criteria beyond what is immediately quantitatively measurable, this could include a range of qualities which research has suggested improves undergraduate learning, such as the social-learning environment, challenge and expectations, and metacognition. However, new measures will be very expensive to develop and implement – witness the challenges of the HEFCE/OfS learning gain programme – and as such a very high bar of 'return on investment' would need to be set and cleared.

14 There is no direct measurement of teaching quality currently available. As a result, the TEF uses existing data as indirect measures of teaching quality. These measures are known as “proxies”.

No

b. If you answered no, what metrics would be more suitable proxies? :

Proxies are rarely, if ever, good measures to use. We are using data sets that we know are flawed – see all research around NSS, etc. As proxies, currently these

are to some extent suitable as a student opinion of student satisfaction of teaching quality, but it is debatable as to whether teaching quality is the same as Teaching Excellence. However they are proxies, in the future, an over-reliance on proxy measures alone, should be avoided and his assessment accompanied by qualitative commentary of equal weight.

Other metrics for consideration include:

- Qualifications of staff (HESA) as a proxy for engagement with the pursuit of teaching excellence
- 'Value added' – HEFCE made a significant investment in trying to establish a measure of learning gain, so it would be appropriate to carry the outcomes of this research into TEF wherever relevant. The Guardian universities league table has for some time included a relatively simple measure of 'distance travelled' by entry qualifications and degree outcomes which might be adapted for TEF purposes.

A post-graduation measurement – a survey question that asks students to rate their time at university retrospectively. This could be included in the Graduate Outcomes survey, building on the optional Net Promoter question bank.

a. Are the metrics used in TEF the best proxies for measuring the TEF criteria (see Figure 1 for a list of the criteria and metrics)?

Some say No – although good proxies for teaching excellence are hard to come by. Some say Yes – in so far as they are those that can be most easily measured at present. However, they are relatively indirect proxies which arguably shed little real light onto variations in teaching and the student experience. The reduction in the weighting of the NSS was, for this reason, disappointing. This was one of the few metrics in the TEF that was a direct reflection of the student experience and focused on the group which the OfS claims to represent – the students. The reliability of surveys like the NSS as a measure of teaching excellence has been the subject of debate, but it is arguably a more reliable measure than any of the other metrics currently utilised.

The metrics included in TEF are used because they are the most readily available across a broad range of providers, and not necessarily because they are robust proxies of the TEF criteria or the richness of outcomes sought from higher education by students and wider society.

The most problematic TEF metrics are grade inflation (see comments on q12) and the two new LEO measures:

Currency is an issue : If the 2020-21 TEF goes ahead as planned, universities will be being assessed on the graduate outcomes (as recorded by LEO) of some students who started higher education in 2008, based upon their employment situation in 2014-15. This will bear little resemblance to current student experience, given extensive work to ensure continuous improvement and contemporary relevance of curricula. It is suggested to remove graduate employment and LEO data from the TEF. Excellence in teaching has very little to do with this. A great deal is to do with social and cultural capital and the disciplines studied.

Validity is another issue : The diverse expectations and aspirations of many students, embracing portfolio careers and social goods, are arguably poorly served by a narrow focus on earnings and sustained employment. Also, although providers can and do add value to graduate employability, graduate employment is overwhelmingly outside providers' control; benchmarking provides some mitigation, but this is still a very flawed measure.

b. If you answered no, what metrics would be more suitable proxies?

The long-term development of TEF presents an opportunity for development of deliberately designed proxy measures for the TEF criteria. In particular, continued improvement in the availability of national student engagement metrics, such as those used in the Advance HE UK Engagement Survey, or those student engagement metrics recently added to the NSS, would be an improvement. The inclusion of the NSS measures of student engagement could enhance the proxy metrics and their relationship to effective teaching and learning practice. Caution will be needed to ensure that the added value of any such developments outweighs their costs.

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15 The TEF metrics are benchmarked to account for factors such as the subject of study, prior attainment, ethnicity and educational disadvantage of the provider's student intake (see that 'What is TEF?' section for detail).

Yes

b. Does TEF benchmark for the right factors?:

Yes the metrics should be benchmarked, and these should follow the same methodology as other official statistics, for example the HESA UK Performance Indicators. This is one of the strongest elements of the TEF as constructed. Benchmarking is a crucial aspect of the TEF and must be retained to avoid TEF replicating existing league tables. There are some issues with the benchmarks but the benchmarking process is an extremely important factor in the overall fairness of assessment. However, we have some suggestions. What are the arguments for not presenting the supplementary grade inflation metric against a benchmark when all other metrics are? There are also questions as to why various dimensions are in or out of different measures. For example, why is sex not taken into account as a factor for the NSS outcomes benchmarking. However, beyond asking which metrics to benchmark, is the critical question of how the

audience for TEF can be supported in understanding that benchmarking is used to arrive at TEF awards. How can the parent of a non-traditional applicant know that the difference between awards of two competing providers was down to metrics being benchmarked?

The most obvious omission in the benchmarking is geographical location for employment outcomes. This could easily be included given the data set involved. Without such benchmarking, the metrics are almost meaningless and vastly over-estimate the quality of teaching of universities in or near London whilst disadvantaging those in the North or South-West where local employment markets are much weaker. Local recruitment and labour market issues have an important influence on student outcomes: the risk of perverse incentives such as universities encouraging graduates to move to the South East (rather than contributing to their own region) seems high with the current system. A further issue is the lack of consideration of inter-sectionality in the benchmarks and split metrics. OfS can and should do more to explain the benchmarking process and make it more transparent in order to improve sector confidence in the process. Also it is arguably the case that few students understand how benchmarking influences rankings in the TEF and therefore its reliability as a measure of teaching excellence. Regional benchmarking would also improve robustness and confidence by addressing marked disparities in NSS and employment metrics.

16 The TEF process uses both quantitative evidence (for example, the core metrics) and qualitative evidence (for example, the written submission).

a. What are your views about the balance of quantitative and qualitative evidence considered in arriving at ratings?:

We remain to be convinced that the TEF process really considers the two (quantitative and qualitative) equally and question whether it is possible to do so. In theory, this combination should allow the possibility of giving the widest possible opportunities for universities to describe and evidence the areas that they excel in. However, in practice, the assessment process privileges the metrics – which are placed first in the sequence of events, thus influencing (albeit unconsciously in some cases) the reviewer through ‘priming effects’. In addition, there are many providers for whom only very limited quantitative data is available hence reviewers are left in the insidious position of having to compare a large provider with a statistically significant set of metrics with a much smaller provider for whom no metrics are available. The metrics should be considered seriously but we think the metrics as they stand are far from perfect. There needs to be far greater transparency about the balance of qualitative and quantitative evidence than there was in the 2017 TEF, and the criteria for decisions and feedback to providers needs to be far more specific. This will only become more important in the subject-level exercise, where the metrics are far less robust due to smaller sample sizes and thus qualitative evidence will properly carry more weight.

The qualitative statement written by the university is necessarily subjective, and prioritises those who can ‘tell a good story’ although this is the area we think is richer. The written submission provides an incentive for subject teams to develop and evaluate a range of enhancements, rather than simply focusing on the metrics. However, the information in these submissions should be auditable, since the risk otherwise is that they reward creative writing rather than innovation.

b. Are there any other aspects of the process that you wish to comment on?:

The ‘absolute values’ (! and *) add a spurious element to the metrics. Having used a system which takes careful note of the context in which an institution or subject is positioned, the use of absolute values is of questionable utility and does not reflect the nuanced approach that the benchmarked metrics offer. In small submissions, the response of a single student may change the outcome considerably, and in extreme cases from the highest 10% to the lowest (or vice versa). The use of absolutes also means that certain subjects (e.g. Medicine) where recruitment is very heavily managed to match available vacancies will almost inevitably appear in the top 10% of DLHE in all universities. This doesn’t help students choose between different institutions – and the impacts are worse at subject level.

While at institutional level there may be an argument for taking account of the top and bottom 10% (although these are more likely to be due to the location of the institution or the type of students they recruit than anything about that HEI’s teaching) – at subject level they absolutely undermine the metrics, and fail to distinguish between different departments in any useful manner. If they must be used at all, applying different thresholds for each subject seems to make more sense in terms of student choice. If there is a concern about the clustering of scores, such that (as in the Medicine example) 99% is considered a ‘low’ score, it would be possible to institute a minimum and maximum cut off point beyond which a score could not be considered high or low in absolute terms. However, this seems unnecessarily complex given that the absolute values add very little to the benchmarked metrics. We believe therefore that they should be removed from the TEF process.

The balance is about right. The degree to which the qualitative submissions influenced TEF rankings/grades was unexpected (and see caveats above) but welcome. The unique circumstances within which HEIs operate cannot be and should not be summarised purely via a set of quantitative metrics. For this reason, the inclusion of written submissions is a good idea, and the emphasis placed upon them by assessors and TEF Panels in the decision-making process is to be applauded. However, it does place a considerable amount of additional pressure on those responsible for drafting these submissions – brief though they may be.

There is still a lack of clarity as to how subject and provider level awards and judgements will interact going into the 2020-21 exercise. As mentioned earlier, we are concerned about the developments in subject level TEF with the aggregation of often unrelated courses, tremendous time burden or writing of submissions and the contradictory pictures for those applying for provider level awards and subject level awards.

Furthermore, it is very unfortunate and burdensome on providers that the first subject-level TEF and the next REF will be running concurrently and are expected to have similar submission dates. If the turnaround time from the release of metrics to the submission deadline is as tight as in 2017, this will create undue and unnecessary burden on providers.

Allowing a longer preparation time in TEF would enable providers to focus their efforts on enhancement and improvement, rather than just assessment and keeping up appearances.

Are the ratings right?

17 Are the purpose(s) of TEF met by:

No

Please explain your answer:

A single rating is not helpful when different departments are performing very differently. This can be hugely disheartening for departments performing very well but which are ranked together with poorly performing departments. Having said that, it could be very divisive to have one department awarded Gold and another Bronze. Institutional coherence and collegiality could be really threatened. I’m not sure about ratings at all, but I’m not sure how else performance should be measured, if indeed it should.

Additional nuance could be valuable (and we understand University Alliance may argue in favour), but this needs to clear a high ‘return on investment’ bar. We

could move to something akin to QAA HER, whereby a judgement is reached on each of the core areas (so separate outcomes for TQ, LE, SO instead of a single overall rating), but would need to ensure the additional insights outweigh the risk of confusion.

No

Please explain your answer :

Not sure about the fourth rating. Why would this be helpful?

Don't know

Please explain your answer :

In theory the parallel with Olympic medals emphasises the recognition and reward of excellence above the QAA threshold for quality and standards of learning and teaching; however this feature of TEF is very poorly understood. On balance it may be easier to rename the awards with terms that make this additional achievement of excellence more explicit than it would be to re-educate the press and public. This is not helpful for students in particular: how do students feel who have graduated from a Bronze institution? Just as worthy as those who have graduated from a Gold one? It has been demonstrated that certain students would not feel able to apply for a 'gold' institution (particularly the case for BAME students). Students with considerably social capital will be deterred from applying to 'bronze' institutions, so it is very possible that a two-tier system of higher education comes out of this exercise, which would be highly detrimental.

The relationship between the institutional award and the subjects needs greater clarity. Each prospective student will be presented with a subject level rating and an institutional rating, with the potential to cause confusion. Most students give primacy to the subject of study, therefore the subject level rating is arguably more important than a provider level award, which is often a secondary and contextual consideration. The notion of bronze, silver and gold reduces something massively complex and nuanced into rather simplistic categories. There needs to be room for more nuance which befits the complexity of understanding and measuring 'excellence in education'. The degree to which benchmarking influences ratings needs to be made more explicit in order that students understand better how the ratings are arrived at, and how they could or should be interpreted.

It could be argued that the bronze rating is not an award as it is given to any provision that has suitable metrics but is significantly below benchmark and for which the associated written submission does not alter the position. Therefore, considering this an 'award' and implying only a slightly lower achievement than silver (given the parallels with sporting medals) is problematic. Bronze, if it is categorised and understood as an 'award', should be meaningful for prospective students. We are not convinced that grouping all institutions (or subjects) into 3 categories accurately reflects the diversity of the sector. Having a more nuanced rating (or set of ratings) would be more appropriate – so probably none of the above. If you had to choose, I would select a) and award a single rating but that was based on a much more subtle scale. I also think the wording of the awards is poor. Gold, silver and bronze imply winners and losers in a way that is unhelpful for the sector's reputation both within the UK and internationally. Given that we market UK HE as the 'gold standard' declaring that a large proportion of it is only bronze seems to be shooting ourselves in the foot.

18 If you answered no, what alternatives you would suggest.

a. For provider-level TEF?:

(for both) Perhaps more of an Athena Swan-type approach where the focus is on development and action-planning. This may encourage a greater focus on actual enhancement.

b. For subject-level TEF?:

(for both) Perhaps more of an Athena Swan-type approach where the focus is on development and action-planning. This may encourage a greater focus on actual enhancement.

c. If your previous response(s) reflected on the impact of the TEF on the international reputation of institutions and/or the UK as a whole, we would welcome any evidence or information you can provide that might support your view or help inform the independent review.:

We would suggest that a much more subtle scale is used with a wider range of possible outcomes (a minimum of 5 points if not something much more detailed). It may also be that there is a need for separate outcomes for each aspect of the TEF. For example there is a big divide between universities and subject areas in terms of those which perform well on the NSS metrics and those which perform well on the DLHE/ LEO metrics – this is completely hidden in the final outcome and means that strengths are being lost in an outcome which doesn't reflect teaching quality in many cases.

Has TEF changed anything?

19 Has the introduction of TEF positively changed the educational experience of students (e.g. teaching and learning)?

Don't know

If yes, how?:

Yes insofar as it has emphasised the importance of teaching and redressed imbalance with research in some contexts. The introduction of TEF has supplemented existing efforts to increase the focus of attention on teaching and learning. However, the cost of TEF to the sector is enormous; this can only be set to grow as we focus on subject level submissions. We need to consider the opportunity cost of the exercise.

The introduction of TEF and the approach of Subject level TEF has focused attention on teaching and the students experience in a way that was intended by the scheme. This has led to some valuable improvements in teaching and student experience, especially in areas where outcomes had traditionally been less good. Colleagues from very research intensive institution indicate it has led their institutions to take education more seriously. The metrics are very important given that they are becoming the drivers of institutional behaviour although it is too early to definitively say that TEF has positively or negatively changed the educational experience of students but some consider that it is likely to.

The TEF has shone a bright light on teaching and the student experience and provided HEIs with data that can be used to identify areas for further enhancement. It has helped to redress the balance between research and teaching as factors in the career advancement of academic staff and has enabled HEIs to focus on metrics which do – even if indirectly – reflect differences in the quality of the student experience. The TEF has ensured that teaching has become an even greater priority for senior leadership teams in HEIs, and has ensured a more balanced and fairer approach to the allocation of resource.

Arguably limited impact in my current institution and mission group (University Alliance) as already focused on L&T, but may be useful to focus attention where there are L&T cold spots (across the sector; also, to some extent, in particular disciplines within a provider). Some of the metrics also provided us with useful new evidence to improve learning and teaching – e.g. the availability of benchmarked data has enabled us to more fairly and clearly ascertain our own position relative to other institutions, and this has been an aid to planning.

20 Has the introduction of TEF negatively changed the educational experience of students (e.g. teaching and learning)?

Yes

If yes, how?:

Yes. In some cases it has reduced the focus on innovation, creativity and excellence which is not reflected in the metrics used. The lack of a teaching qualifications metric has also meant that this area has been pursued less strongly than it has been in the past – and some institutions have very little support to enable staff to gain teaching qualifications. There are some metrics over which institutions have very little influence (LEO certainly cannot be influenced in the short term), and the impact of focusing increasingly on employability and financial outcomes may have negative consequences for student learning and a narrowing of the curriculum.

It is impossible to answer this fully in advance of the launch of subject-level TEF, which is set to occupy substantially more resource (see UUK report just released, estimating £1/4m cost per provider). However the perennial 'weighing vs fattening the pig' dilemma comes in here – important that the exercise itself (and not just its outcomes) contributes to enhancement as far as possible, it risks becoming an industry in its own right (e.g. how many providers have created TEF posts, how far has this diverted resource from the front line?). Such impact will be exacerbated further if university resources are set to become more limited following the Augar Review.

No, although it is very resource intensive, and the proposed model of provider and subject level TEF will be more so. There is a danger that resources will have to be diverted to supporting the TEF submission process. What is the evidence of improvement? We know more about our own data and metrics and we know of some rich and interesting examples of good teaching and learning etc provision and experience and we can build on that by sharing it and inform development with it but what is the evidence of teaching improving because we are focused on writing to and beyond the TEF metrics?? Needs more careful exploration rather than developing and enhancing the provision that TEF is reviewing.

21 Has the introduction of TEF impacted positively on research and/or knowledge transfer?

No

If yes, how?:

It has enhanced knowledge transfer in some contexts. For example, it has initiated conversations around the similarities between teaching and research with greater focus and esteem for pedagogic research, which has encouraged staff to write educational articles.

Hard to say but my fear is that overall increasing pressures are being placed on our academic community -- it's hard to be excellent at education, research, service delivery, citizenship, entrepreneurship etc or whatever the key dimensions of promotion and evaluation are for academic staff, nor is the TEF geared up to encourage such transfers.

22 Has the introduction of TEF impacted negatively on research and/or knowledge transfer?

Don't know

If yes, how? :

If anything it has made the tension between teaching and research stronger, especially considering the timing of the first TEF subject submission and the next REF.

The current clash of REF and TEF cycles is unfortunate and may prove a detriment to both exercises.

Broader point potentially about 'goal diffusion'... not just the tired/flawed teaching vs research argument, but on pursuing core activity vs evaluating it (cf q20).

As mentioned in a previous response, TEF is already very resource intensive, and the proposed model of provider and subject level TEF even more so. This displaces limited resources for other core activities, including research. We acknowledge and support efforts to establish a parity of esteem between TEF and REF, but it must be recognised that working towards a submission in both at the same time is extremely resource intensive and places significant pressure on all staff to maintain a focus on the student experience.

Yes – as the focus on teaching has almost inevitably taken time away from research, and it has also had negative impacts on staff stress and mental health as they are expected to deliver across an extensive set of agendas to an extremely high level. See answer to Q19.

Is TEF worth it?

23 Does TEF help you as a student/provider/employer?

No

Please explain the reasons for your answer.:

With increased scrutiny on university finances, is this the best use of our resources? Where is the evidence for this? Could we incentivise an enhanced provision in other more meaningful ways?

As a provider, the provision of the metrics, at both provider and subject level, split by the different student characteristics, has provided a rich data set affording some providers a greater and more detailed understanding of some dimensions of the student experience, facilitating an increased focus on enhancements to

support development. However the work towards enhancement is an unguaranteed by-product of completion of the TEF responses

Colleagues from different parts of the sector responded differently:

The TEF helps those of us working in teaching and learning in a research intensive university by giving us leverage to encourage colleagues traditionally focused on their research to invest more time, energy and creativity in education enhancement. We are also improving our use of data (quantitative and qualitative) in understanding education in our institution which is also welcome -- i.e. inducing us to take a more rigorous scholarly approach to what we do. Again the challenge is that the focus should become education enhancement and not metrics chasing. But where we can use the TEF for positive leverage this is valuable.

It can help educational development units by putting a focus on teaching. More people now talk about teaching and how to raise the quality of teaching. The flip side is, though, that colleagues are reluctant to take risks if their performance is OK at present. They don't want to 'slip'. The same can be said for institutions. This can, therefore work against higher education remaining dynamic and innovative: if you have gained a gold rating, why would you change?

As a provider, the TEF has the potential to help us market our teaching excellence and encourage students to look beyond the league tables. However, as it stands, the use of dubious proxies in the metrics, together with little focus on aspects of genuine excellence – such as staff teaching qualifications, number of National Teaching Fellows etc – as well as the over-riding focus on employment outcomes (and income) means that the TEF results do not reflect the high quality of our teaching provision.

24 Explaining your reasoning, what are the most significant costs of:

a. Provider-level TEF?:

The most significant costs involved in both provider and subject level TEF are:

- staff time in leading the process across the institution, including a significant amount of time in verifying and reviewing the metrics;
 - collating and verifying evidence;
 - supporting staff with training and understanding the TEF assessment process and metrics;
 - writing submissions;
- developing and leading enhancements.

Homogenisation of all subject areas is not necessarily representative. Potentially demoralising for subject areas performing well and can limit incentive. Does not provide students with clear guidance on the quality of teaching in different disciplines.

Senior management and other staff and student input into analysing the metrics and writing the submission. Development of teams of people involved in data and analytics to ensure full understanding of metrics and most effective submission and use of data. Teaching and learning support staff to assist in enhancing practice especially in areas of poor performance.

We are not sure we have different answers for provider and subject level. It absorbs a significant amount of time and energy, much of which is expended on managing the challenges outlined above (e.g. analysing flawed proxies at a less than optimal level of granularity). So predominantly an opportunity cost.

b. Subject-level TEF?:

This is potentially very divisive and could engender a blame culture. Could lead to the closing of subject areas based on poor ratings that are actually a result of things beyond their control. Hugely time-consuming and can take attention away from the actual teaching. We are broadly concerned about the inaccuracies, often bizarre linking of courses, confusions between provider and subject level ratings and what this means for students and their experience, as well as the costs of subject level TEF. A

vast amount of staff time involved in putting together submissions across 30+ subject areas. Teams of people involved in data and analytics to ensure full understanding of metrics and most effective submission and use of data. Teaching and learning support staff to assist in enhancing practice especially in areas of poor performance.

Subject level TEF will be much the same, but the impact is magnified due to the overall increase in submissions, and the workload increase is on more and different people – subject level places more demands on front line staff (and therefore potentially distracts from student experience?).

25 Explaining your reasoning, what are the most significant benefits of:

a. Provider-level TEF?:

The TEF is already driving enhancement in many institutions across a range of aspects of teaching and learning and the student experience. It has provided a more nuanced understanding of where we are as an institution and could with subject level TEF do so for each subject, against sector benchmarks.

TEF has facilitated an understanding and sharing of good practice, as well as a celebration and development in areas where there is excellence. It has fostered a greater understanding of who our students are and the journey they go on, as told by the metrics and contextual data.

TEF enforces a stock-take of the University and its subject areas, which can drive improvements. It is promoting teaching at participating higher education providers and is moving toward a parity of esteem with research. Driving improvements at subject level could ultimately lead to greater societal benefits, for example, across the professional and vocational disciplines.

It can, if utilised effectively, put an institutional focus on enhancing the quality of teaching and recognising and rewarding excellent teaching at both research intensives and providers with amore focused teaching orientation . Where this is happening, It focuses on the institution as a whole and could be seen as unifying rather than being divisive.

Introduction of a Teaching Excellence Framework has prompted all staff to take seriously the importance of teaching and the wider student experience. Focus on improving areas of poor performance. Improved strategic response to T&L issues. Strengthened student voice.

b. Subject-level TEF?:

Some of the positives are that this would allow different subjects to demonstrate progress, good practice and be recognised for this. At this level, change can seem more possible: it can seem beyond the capabilities of subjects to have a discernible impact on institutional change, but change at this more local level can seem possible. For potential students a subject-level TEF could be of greater use in terms of informing choice.

It's helpful to have the data at subject as well as provider level. In theory subject level is more meaningful for students (whose experience is primarily influenced by dept/programme) and indeed teaching staff (whose primary identity is typically disciplinary rather than institutional, and therefore might be more engaged), in practice as already argued this is not the level of granularity achieved (or attainable).

However overall we are less convinced of the added value of running the entire exercise at subject level. However the grouping of courses is erratic, the burden of relating metrics to written submissions very time heavy for subject staff and the results although telling interesting valuable stories often about teaching and learning on some courses, would need to be nuanced for a student audience.

Is TEF fair?

26 Are there particular types of students, provision or providers that are disadvantaged by the current design of TEF, in a disproportionate way?

Yes

If so, what changes could be made to address this?:

It feels unfair that due to the current devolved set up in the UK and the new approaches to HEP, that depending on where you live, the cost and experience of HE will necessarily differ, particularly if you cannot travel to attend university. As such, the rating of institutions (who are not on a level playing field) against one another that TEF encourages is inherently inappropriate and assumes mobility and choice. Surely it is about the best institution for the student, not the best institution (against narrow criteria) per se that is important.

I think that students who attend or graduate from a 'bronze' institution are disadvantaged. Employers, etc are going to want employees who are from 'gold' institutions by and large. Move away from this type of rating system.

Providers in areas of low local unemployment rate (particularly those that service a regional or civic purpose and recruit students mainly from within the local area or mature students) will be systematically disadvantaged by the TEF process. There are also inbuilt disadvantages which relate to the type of students and type of provision offered which are introduced by the use of absolute values (these will favour universities that do least in terms of widening participation and act as a counter to other drivers to increase recruitment from these groups to 'elite' institutions).

Again, regional disparities point if we want to make it. Does it capture p/t experience and outcomes effectively (not my area of expertise)? PG and international students currently excluded, but not sure we want to go there... SO measures in particular presume a 'traditional' student (school-leaver completing study before entering job market), arguably does not reflect/address the diversity of student body and their aspirations. (To be fair, not sure what a constructive alternative would be... revised NSS/GO which aims to capture broader student aspiration and achievements, e.g. social mobility and civic contribution type considerations?) Subject level TEF also could prove a brake on creativity (traditional subject taxonomy – scrapping it would sidestep that one, albeit not sure that counts as a constructive response...).

Further education (FE) institutions do not have the same infrastructure as higher education institutions to support the same preparations for TEF. Therefore, FE institutions are heavily disadvantaged by the demands of the TEF process, which could mask high quality teaching provision.

The current minimum requirement for subjects, in regards to student numbers (20 students in the contextual data) is not fit for purpose. It has been acknowledged that statistically the data are not robust enough to produce meaningful and reliable metrics, which therefore produces unreliable initial hypothesis and default Silver. The minimum should be increased to 40 students as previously recommended

27 Are there particular types of students, provision or providers that are advantaged by the current design of TEF, in a disproportionate way?

Yes

If so, what changes could be made to address this?:

Institutions whose students are being educated for certain graduate level careers are advantaged by the emphasis on employment and employability skills e.g. medicine, veterinary medicine, dentistry, teaching, etc.

Removing the absolute values and benchmarking the employment outcomes data are two obvious solutions.

TEF is linked to widening participation and ensuring positive outcomes for all, yet there is no adjustment or high-level standard that institutions with predominantly white, middle class, high tariff students are subject to. TEF metrics favour these students by fact of better expected outcomes for these groups, despite benchmarking, and leaves the widening participation 'heavy lifters' in the sector needing to invest additional resource to develop enhancements, prepare student success strategies and write more detailed submissions to achieve the same rating. Therefore, to mitigate this, it is suggested that TEF should link more closely to the provider's contextual data and the new access and participation dataset from the Office for Students.