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University Alliance brings together 18 universities with a common mission to make the difference to their cities and regions. We use our experience of providing high-quality teaching and research with real world impact to shape higher education and research policy for the benefit of our students and business and civic partners. We innovate together, learn from each other and support every member to transform lives and deliver growth.

### Summary:

University Alliance recommends:

- Quality Assessment (QA) and the Teaching Excellence Framework (TEF) should be integrated into a single system
- TEF should not by itself be used to determine whether universities can charge undergraduates more for their tuition. The proposed link with tuition fees should be introduced for well-established universities passing a new risk-based QA threshold
- Any future QA system should continue to separate the role of assuring quality from the role of funder and lead regulator
- The principles of provider self-evaluation, peer review and quality enhancement should be embedded in any new QA and TEF framework

#### 1. What issues with quality assessment in Higher Education was the Higher Education Funding Council for England's (HEFCE) Quality Assurance review seeking to address?

HEFCE was responding to significant change in the higher education (HE) sector including an increase in the number of alternative providers entering the market and the escalation in undergraduate tuition fees towards £9,000. It stated that one size can no longer sensibly fit all, something that University Alliance agrees with. HEFCE was also addressing anecdotal evidence that the current regulatory system was unnecessarily burdensome, particularly for well-established universities of HE with strong track records in QA.

#### 2. Will the proposed changes to the quality assurance process in universities, as outlined by HEFCE in its consultation, improve quality in Higher Education?

We agree that replacing the fixed review cycle with a risk-based process, which tailors the intensity and frequency of external review to each provider, is desirable. Well established universities with a strong reputation for maintaining their own quality and standards should only be subject to a cyclical, intensive review process if there is deemed to be a risk. However we believe the proposals do carry risks which potentially jeopardize quality in UK HE:

**International reputation.** UK HE is a major export for the economy. While not directly affecting the quality of UK HE, a successful endorsement from the European Association for Quality Assurance in Higher Education (ENQA) is a quality mark recognised across the world. Any new UK QA system will need to correspond with the principles of external review as outlined by the European Standards and Guidelines (ESG).

**Separation of powers.** In line with the ESG, we believe a QA system should be independent. It is important for the reputation of UK HE that any future QA system

continues to separate the role of assuring quality from the role of funder and lead regulator – for example, the Higher Education Funding Council for England (HEFCE) and Quality Assurance Agency (QAA) model. This will provide a higher degree of public assurance and confidence both in the UK and internationally. It will also protect independence and avoid conflicts of interest.

**Quality vs Enhancement.** We are concerned about enhancement being omitted from the proposals (the principle that universities should improve the quality of the learning experience). This is an element of the current review process which is valuable and should not be lost.

**Beyond a checklist.** Any framework used for implementing QA, such as the UK Quality Code for Higher Education must not be used purely as a checklist, but as a set of definitive reference points to help autonomous universities reflect on and develop their regulations, procedures and practices.

**Too much responsibility for governing bodies.** We believe there are issues in changing the arrangements for provider governing bodies responsibility for QA. Governing bodies are already responsible for the 'academic offer', but the practicalities of this remain with provider Academic Boards (or equivalent). If governing bodies take on more responsibility they will require substantial training and development, and some will need to review their membership.

**Unnecessary centralisation of External Examiners.** Many universities already draw their external examiners from a wide range of universities and professional backgrounds. They have strong recruitment, induction and support mechanisms already in place. We are not supportive of the introduction of centralised register or enforced additional training. This potentially adds a greater financial burden to universities.

### 3. What should be the objectives of a Teaching Excellence Framework ('TEF')? a. How should a TEF benefit students? Academics? Universities?

University Alliance welcomes the new focus on teaching excellence, but defining and measuring it is by no means straightforward. With no literature yet published by the government, we want to ensure that TEF is rigorous in its design and implementation.

#### How should a TEF benefit students?

**Public information.** TEF should be designed to improve information for prospective students and their families to aid comparability between institutions. This group is a key audience for TEF outputs.

**Value for money.** Outputs from TEF must demonstrate the value that students gain from their time at university. It is important to acknowledge the difficulties students face in finding out the proportion of their tuition fees used to cross-subsidise activities that may not be directly related to their own student experience.

**Social mobility.** It is difficult to see how a single framework could adequately signal to all students the excellence of the teaching they would receive while also recognising the additional effort made by those universities that have large numbers of students from non-traditional backgrounds (whom evidence shows are costlier for universities to support). The introduction of TEF should enhance efforts to increase social mobility by using (for example) data created from measuring student learning gain. Other data sources such as earnings from HMRC could be used – for example the Small Business,

Enterprise and Employment Bill passed towards the end of the last Parliament will make it possible to link graduates' income tax records with their background as students.

#### How should a TEF benefit academics?

**Raising the status of teaching.** TEF has the potential to raise the status of academic teaching in UK HE and support the progression of new academics, in the same way as REF. We believe that good teaching should be research-informed and TEF can help universities and academics balance teaching with research.

#### How should a TEF benefit universities?

**Continuous improvement.** We do not believe there is a widespread problem with poor teaching. Of course, good universities will always want to do better. It would therefore be helpful if TEF was constructed in a way that incentivises universities continually to improve their teaching and facilitates and openly share good practice.

#### b. What are the institutional behaviours a TEF should drive? How can a system be designed to avoid unintended consequences?

**Teaching innovation.** TEF must incentivise rather than discourage innovation in teaching. It should not be mechanistic with tight criteria that might push institutions towards less innovative methods of teaching.

**Gaming.** TEF risks the use or introduction of data sources that are easy to game. Using longitudinal data, rather than data drawn from a single academic year, will help to address this. Contextualisation is also vital to making any system involving metrics less gameable, perhaps through qualitative information such as supportive statements (like the Environment statement in the REF) and peer review. Specific metrics proposed - for example, earnings-based outcome data - carry significant problems without context (i.e. differences between industries, regional wage disparities etc).

**Misleading public information.** Unless TEF respects the diversity of the HE sector it risks outputs being taken out of context and contributing to misleading public information sources such as league tables.

#### c. How should the effectiveness of the TEF be judged?

**Public confidence.** The public must draw confidence from the outputs of TEF and use these outputs to differentiate between HE providers.

**Interrelationship with QA.** If TEF is embedded within the QA process universities will be subject to a less burdensome process.

#### 4. How should the proposed TEF and new quality assurance regime fit together?

The TEF and QA should operate under one joint system. This will ensure that the relationship between the regulator and universities is based on enhancement as well as assurance. It will remove unnecessary duplication of data and could raise the profile of teaching in universities. The interrelationships must be considered when implementing any system – in particular the following points should be considered:

- An avoidance of overregulation and duplication
- Using currently available metrics for both processes
- The development of new metrics which can be used for both processes

- A focus on student outcomes
- Both processes being underpinned by minimum standards
- An ultimate drive towards excellence

**Department level focus.** Excellence in teaching sits at the departmental level, so must be measured at that level. TEF offers the opportunity to do this, with scores being aggregated to create a provider ‘total’ which will complement the QA process.

**Data Metrics.** There is a significant volume of progression, retention and achievement data available through universities’ Higher Education Statistics Agency (HESA) returns which could be used as part of QA and TEF; for example, the Key Information Set (KIS), which includes National Student Survey (NSS), Destination of Leavers in Higher Education (DLHE) and contact hours, class size and dropout rates. Other available information includes outcomes from QAA reviews, OIA cases, External Examiner reports and data gathered as part of HEFCE’s annual monitoring. QA and TEF should use measures – like accreditation by professional bodies – which indicate that employers have been involved in course development. Proposed new NSS questions are going to encourage universities to measure elements of student engagement with learning. QA and TEF should encourage universities to use the findings from these questions to enhance their teaching.

**Beyond data metrics.** The limitations of data metrics are well recognised. While the sector already collates a significant amount of data, for example, on student satisfaction, completion and employment, there are known drawbacks especially if any one measure is over-used to form judgements. For example, data gathered over the last two academic years from HESA returns on teaching qualifications has recently been published, but its usefulness is restricted by a lack of sufficient detail (40% of all UK universities relevant staff qualifications were ‘unknown’ in 2013-14). Another problematic data source is the DLHE, as it only captures a snapshot of graduate employability or further study 6 months after graduation. Satisfaction, as measured by the NSS is also not the only measure of value. There is an extensive body of published research in HE pedagogy which captures and reflects on teaching and learning practice which may be used in evidence alongside case studies of excellent practice. TEF presents the opportunity to look beyond teaching and focus on the student learning outputs.

**Peer review.** Using peer reviewers, including students, will provide important context for both QA and TEF. QAA already has an established network of qualified and trained reviewers. In addition the reviewers for National Teaching Fellowship awards and Principal Fellowship awards are already established and experienced in recognising excellence in teaching and learning practice.

**Assurance and enhancement.** We believe the QA process should be based on an assurance and enhancement relationship with universities, complemented by TEF. The overall process should offer well-established universities a more enhancement led QA review, as is the case in the Scottish HE system. In parallel, newer HE providers should receive a more robust QA review, in line with the current system, which uses cyclical review and minimum standards. This should use peer-to-peer annual dialogue to support newer entrants in building their capacity to self-assure quality. Many universities already engage with processes where they can evidence excellent practice, for example through National Teaching Fellowship submissions and Senior and Principal Fellowship recognition. The evidence of these impact case studies recognises excellent teaching and wider student experience support in a style which mirrors impact case studies for the Research Excellence Framework (REF).

5. What do you think will be the main challenges in implementing a TEF?

**Swift introduction.** TEF will come into effect in 2017/18. Because of this relatively narrow timeframe, TEF should be an iterative process – possibly introduced in several phases as measures are developed and pilots are run and evaluated. New ways of measuring teaching excellence should be brought in at a later date subject to testing.

**Diversity of the sector and institutional autonomy.** One size will not fill all HE providers and there are risks that a tightly defined TEF will encourage HE providers to “act the same”. To respect the diversity of the HE sector TEF should allow for data to be contextualised using institutional benchmarks and self-evaluation. Different types of HE provider should be able to assert evidence of teaching and student experience excellence, which showcases the particular areas in which they have strengths. TEF needs to enable HE providers to highlight different / distinguishing roles (for example in student support) and where there are distinctive disciplinary differences in the academic offer.

**Robustness of a single dataset.** Data used as part of TEF should be reviewed over a significant period of time, not just a single academic year. This will allow patterns to be identified and universities to reflect on abnormalities in the data.

6. How should the proposed connection between fee level and teaching quality be managed?

We believe TEF should not by itself be used to determine whether universities can charge undergraduates more for their tuition, especially at the early stages of its introduction. However we recognise that more investment is needed in UK universities. We believe that TEF should be integrated into the QA system and the link to fees then introduced for those well-established universities with a strong track record who pass the new risk based QA threshold.