

Question	Choice	Response
<p>1</p>	<p>To define 'subjects' in subject-level TEF, do you:</p> <p>a) Agree with the level 2 of the Common Aggregation Hierarchy as the classification system (CAH2, with 35 subjects), and if not, what other systems could be used and why?</p> <p>b) Think that specific changes or tweaks need to be made to the definition of the 35 subjects in CAH2, or to the 7 subject groups used in Model B, and if so, please explain why?</p> <p>(page 10)</p>	<p>Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree</p> <p>Yes No</p> <p>If disagree/strongly disagree, what other systems could be used and why?</p> <p>Overall, we agree with the use CAH2 as the classification system. With regards to the terminology used to describe CAH2, we do wish to note that this system represents 'subject groupings' rather than individual subjects. While there are some issues with its use, and while it does not necessarily align with the way in which courses are organised at institutions, it is a system that is relatively well understood by the sector and that HESA has developed to improve consistency in subject groupings.</p> <p>If Yes, please explain why:</p> <p>It may be helpful if providers had the option of recoding some of their courses in an easy and/or inexpensive manner to align their TEF submissions with how courses are organised within their institutions.</p> <p>If Model B (or a modified version of it) is to be retained, the seven subject groups should not be used in future versions of this exercise. As noted in the technical document supporting the consultation, these seven subject groups do not reflect the diverse structures that</p>

			<p>exist across institutions. Providers group their courses differently from the seven subject groups – as such, the preparation of submissions in relation to these larger subject groups may be challenging and may not accurately reflect the different and diverse activities taking place within courses. Overall, Model B (or an alternative model with a bottom up approach, as we propose in our response to question 4) could still achieve the same results if the CAH2 subject groupings were also used for submissions, particularly as the TEF rating is based on the CAH2 subject groupings. While the number of submissions may be higher, the process would be more streamlined and would avoid challenges associated with multiple staff across multiple faculties trying to capture diverse activity within one submission.</p>
2	<p>Do you agree that we should have a longer duration and re-application period in the subject-level TEF?</p> <p>(pages 11 and 12)</p>	<p>Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree</p>	<p>The focus of this question is on the extension of the duration. However, please provide as much detail as you can on your preferred length for the duration and/or reapplication award:</p> <p>We agree that the subject-level TEF award duration and reapplication period should be longer – to a degree. The length of the duration and reapplication period needs to strike a balance between minimising the burden associated with submission and approvals (and thereby ensuring value for money) for all parties involved in provider-level and subject-level TEF exercises (including providers, DfE and the OfS) and ensuring subject-level TEF ratings – and the information prospective students are able to obtain on these subjects – accurately reflect up-to-date data and the pace of change within the sector.</p>

			<p>We would recommend the adoption of a modified version of option 1. We agree that a five-year award duration with an annual assessment period would be most appropriate. A six-year old TEF rating would be based on historic data which may not necessarily reflect what a student may experience on the course in question and may not reflect the rapid pace of change within the sector (e.g. use of technology in teaching, improvement in technologies and methods used to enhance teaching, etc.).</p> <p>However, providers should have the opportunity to reapply for subject-level and provider-level awards on an annual basis – particularly as (in the case of English institutions) they are mandated to take part in the TEF as it is a regulatory requirement. In light of this, providers should be able to ensure their award reflects the most relevant data.</p> <p>We acknowledge that this may be create a larger volume of work – particularly for assessors – however this would ensure the robustness of the overall exercise.</p>
<p>3</p>	<p>Should subject-level TEF retain the existing key elements of the provider-level framework (including the 10 TEF criteria, the same suite of metrics, benchmarking, submissions, an independent panel assessment process and the rating system)?</p> <p>(pages 13 and 14)</p>	<p>Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree</p>	<p>If disagree/strongly disagree, please explain:</p> <p>We generally agree that subject-level TEF should retain the existing key elements of the provider-level framework to ensure consistency and some uniformity across all aspects of the TEF exercise. However, these elements should be improved to ensure the exercise is able to</p>

		<p>capture the diverse forms of teaching excellence that are present across the diverse range of UK higher education providers.</p> <p>As part of subject-level TEF (no matter which design model is ultimately adopted by Government), we recommend that providers should be able to include a contextual provider summary in each subject-level assessment, to ensure that subject assessors have access to relevant information related to the provider’s operating context. This could reduce the need to add further explanations on context elsewhere in the subject-level submission. This contextual provider summary could be focused on the three TEF criteria that are the focus of provider-level submissions under the proposed Model B (i.e. TQ2, LE1 and SO3), or could be more flexible, to allow institutions to focus on specific elements they wish to highlight as part of their overall approach.</p> <p>While we agree with the need for consistency/some uniformity across subject-level and provider-level TEF exercises, there are ongoing challenges with the TEF metrics and benchmarking that will need to be examined by DfE and the OfS, and as part of the forthcoming statutory independent review of the TEF, scheduled to take place next year. In particular, benchmarking needs to be conducted in a way that recognises labour market diversity (between regions and employment sectors) and does not have any adverse effects on the growth of flexible provision within higher education, among other factors. The option for providers with a high portion of part-time provision to submit an additional page of</p>
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4	<p>For the design of subject-level TEF, should the Government adopt:</p> <ul style="list-style-type: none"> • A 'by exception' approach (i.e. a form of Model A), or • A 'bottom up' approach (i.e. a form of Model B), or • An alternative approach (please specify)? <p>(pages 13 and 14)</p>	<p>'By exception' 'Bottom up' Alternative</p>	<p>Please explain your answer:</p> <p>We recommend the Government adopts an alternative model, that mainly builds on the best aspects of a bottom up approach (i.e. 'Model B'), and but incorporates a contextual provider-level summary at an earlier stage of the assessment, to ensure assessors are able to access relevant information on the context in which the provider is operating, before allocating subject-level and provider-level ratings. This approach would encourage a more 'holistic' treatment of subject-level and provider-level TEF and would also allow providers to provide more comprehensive information as part of their individual subject grouping submissions.</p> <p>While the alternative model we propose is based on a 'bottom up' approach, we do not recommend that the seven subject groups used in the Model B pilots be retained. As we note in our response to question 1b, subject-level could still achieve the same results if the CAH2 subject groupings were also used for submissions, particularly as the TEF rating is based on the CAH2 subject groupings. Providers would have the choice of preparing subject submissions based on</p>

			<p>the subject-level metrics (i.e. they would only prepare a subject submission if they wanted to do so – in instances where a subject submission was not prepared, the subject-level metrics, along with the provider-level contextual submission, would be used to determine the subject-level rating). While this could result in a higher number of subject-level submissions and greater burden in some instances, it would strengthen the robustness of the exercise and allow providers to prepare their submissions in ways that are more pragmatic and more aligned with their institutional structures.</p> <p>The provider-level assessment in the alternative model we propose would be conducted in a similar manner to ‘Model B’ (i.e. the provider metrics and the provider-level contextual submission and the subject-level ratings are used to reach a final provider-level rating).</p> <p>We have prepared a visual depiction of how the alternative model we are proposing would work, which we will submit to DfE via email.</p>
5	<p>Under Model A, do you agree with the proposed approach for identifying subjects that will be assessed, which would constitute:</p> <p>a) The initial hypothesis rule for generating exceptions from the metrics?</p>	<p>Strongly agree</p> <p>Agree</p> <p>Neither agree nor disagree</p> <p>Disagree</p> <p>Strongly disagree</p> <p>Strongly agree</p>	<p>If disagree/strongly disagree, please explain why:</p> <p>We agree with the initial hypothesis rule for generating exceptions from the metrics.</p> <p>Please explain:</p>

	b) Allowing providers to select a small number of additional subjects? (pages 15 and 17)	Agree Neither agree nor disagree Disagree Strongly disagree	We agree that providers should be allowed to select additional subjects for submission. We would, however, recommend that providers not be limited in the number of subjects they are allowed to submit. Please see our response to question 4 for further information on how an alternative subject-level TEF model could allow this in a way that minimises administrative burden and provides the same level of information to providers and assessors.
6	In Model A, should the subject ratings influence the provider rating? (pages 15 and 18)	Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree	Please explain: As Model A is currently designed, the incorporation of an additional step where subject ratings influence the provider rating could create further complexity, as outlined in the consultation document. The model we propose in our response to question 4 would allow subject ratings to influence the provider rating (in a similar way to Model B) all while ensuring subject-level panels have access to provider-level contextual information (albeit before a final provider-level rating has been reached) as part of their assessments.
7	In Model B, do you agree with the method for how the subject ratings inform the provider-level rating? (pages 16 and 19)	Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree	Please explain: We generally agree with the method for how the subject ratings inform the provider-level rating in Model B. As part of the calculation for the subject-based initial hypothesis, we recommend that the final subject ratings be weighted by the number of full-time equivalent students (rather than just the number of students) to better reflect diverse delivery modes. As noted in our previous responses, we would also welcome the incorporation of provider-

			<p>level contextual information as part of the subject-level submission. This would allow assessors to consider useful institution-wide information as part of their assessment, and potentially strengthen the links between the subject-level and provider-level assessments, without creating a complex feedback loop.</p>
8	<p>Do you agree that grade inflation should only apply in the provider-level metrics? (pages 20 and 21)</p>	<p>Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree</p>	<p>If you are able, please provide information about how grade boundaries are set within institutions to inform whether our rationale applies consistently across the sector. Comments on the potential impacts of applying grade inflation only at provider-level are also welcome:</p> <p>We agree that grade inflation should not apply in the subject-level metrics as per the reasons outlined in the consultation document (e.g. small sample size effects, natural variation, etc.).</p> <p>We do also wish to provide comments on the use of grade inflation at the provider level. The data providers self-declare for this metric measures grade change over time – which may capture grade inflation but also grade improvement. As noted in Universities UK’s and GuildHE’s October 2017 report on degree algorithms, grade improvement “is an observable and persistent trend in the higher education sector, both in the UK and internationally”. UUK, GuildHE and QAA. have begun work earlier this year to further examine the specific factors associated with the rise in the number of firsts over the last decade and whether “these rises can be attributed to improvements in ability and performance, and whether grade inflation is also a factor”.</p>

			<p>We hope that DfE’s ongoing work in this area and the forthcoming independent review of the TEF take into account the outcomes of the work being done by UUK, GuildHE and QAA. As grade inflation is tied to many of the registration conditions providers must meet to be on the OfS register, it may be best if this metric were part of the OfS’ regulatory activities, rather than the TEF.</p>
9	<p>What are your views on how we are approaching potential differences in the distribution of subject ratings?</p> <p>(pages 21 to 23)</p>	N/A	<p>You may wish to comment on very high and low absolute values, clustered metrics and regulation by PSRBs:</p> <p>We agree with the approach outlined in the consultation document on very high and low absolute values, clustered metrics and regulation by PSRBs. We agree that a forced distribution should not be imposed on each subject.</p>
10	<p>To address the issue of non-reportable metrics:</p> <p>a) Do you agree with the proposed approach?</p>	<p>Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree</p>	<p>If disagree/strongly disagree, please explain why:</p> <p>There are concerns that the current number of non-reportable metrics emerging during the pilot exercise is too high. A high reliance on proxies may impact the robustness of the overall assessment framework. As such, we would recommend that DfE consult further with providers participating in the subject-level pilots to develop a more robust approach to address non-reportable metrics. This alternative approach may include the use of internal institutional data to fill in data gaps, among other possible options.</p>

	<p>b) When assessment occurs, do you prefer that assessors:</p> <ul style="list-style-type: none"> i. Rely on group metrics alongside any reportable subject-level metrics? ii. Rely on provider metrics alongside any reportable subject-level metrics? iii. Follow an alternative approach (please specify)? <p>(page 24)</p>	<p>Group metrics Prov. metrics Alternative</p>	<p>Please explain:</p> <p>As noted in our response to question 10a, it may be best to adopt an alternative approach that reconciles the metrics with internal institutional data, with an ultimate focus on filling data gaps in the most robust manner. If this data reconciliation still results in data gaps, it may be best to not proceed with an assessment and a rating. Overall, we would recommend that DfE consult further with providers – particularly those currently participating in the subject-level pilots – to determine the best way to address this issue.</p>
11	<p>Do you:</p> <p>a) Agree that QAA Subject Benchmark Statements and PSRB accreditation or recognition should remain as a voluntary declaration, and if not, why?</p> <p>b) Think that there are any subjects where mandatory declaration should apply?</p>	<p>Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree</p> <p>Yes No</p>	<p>If disagree/strongly disagree, please explain:</p> <p>It makes sense for these to remain a voluntary declaration. On QAA Subject Benchmark Statements, we agree with the challenges outlined in the consultation document related to consistent reporting by providers against these statements. PSRB accreditation/recognition can be an asset but should not be a mandatory declaration as part of TEF, given the diversity of accreditation/recognition between subject groupings. Providers should be able to continue to showcase PSRB accreditation/recognition as they see fit/where applicable – alongside other models of excellence – as part of their submissions.</p> <p>Please outline which subjects should have mandatory declaration and why:</p>

	(page 25)		We would discourage mandatory declaration of PSRB accreditation – even in subject groupings where it may be more important. Subjects for which this would be required may fluctuate over time, and providers may be penalised for using other approaches to demonstrate the quality of their programmes. A voluntary approach to PSRB accreditation declarations will be best in allowing providers to demonstrate how this evidence enhances the quality of their courses.
12	Do you agree with our approach to capturing interdisciplinary provision (in particular, joint and multi-subject combined courses)? (pages 26 and 27)	Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree	Please explain your answer. We want to ensure that providers are not discouraged from taking an interdisciplinary approach as an unintended consequence of subject-level TEF. We therefore welcome feedback on how the proposed approach will impact on providers and students. We do not agree with the proposed approach to capturing interdisciplinary provision. The three broad ‘general’ subject groupings, and the way in which these subject groupings are benchmarked, may not appropriately capture how interdisciplinary provision is delivered. Notably, the Open University, through its Open programme, is responsible for the majority of combined honours teaching in the UK. The variety of subject groupings Open programme qualifications could include, and the teaching methods used to deliver such qualifications, could make comparability between interdisciplinary provision difficult. We would recommend that the results of the first year of the subject-level pilots be fully analysed and that the providers responsible for a large proportion of

			this type of provision be consulted further before the approach to capturing interdisciplinary provision is finalised.
13	On balance, are you in favour of introducing a measure of teaching intensity in the TEF, and what might be the positive impacts or unintended consequences of implementing a measure of teaching intensity? (page 28)	Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree	Please explain: Based on feedback provided by our member institutions – in particular, those taking part in the subject-level TEF pilots – we strongly disagree with the introduction of a measure of teaching intensity in the TEF. We appreciate that the Government recognises the complexity associated with capturing teaching intensity in a single measure. However, the options proposed to measure this are complex, resource intensive and time intensive. They do not reflect diverse teaching methods and diverse modes of delivery (e.g. part-time learning) and are not structured in ways that encourage active student engagement. Also, they may not fully take into account the expectations students must fulfil as part of their learning. Ultimately, this measure may not provide helpful, easy to understand information on teaching quality for students and may not provide value to the overall TEF exercise. The methods proposed to capture teaching intensity (in particular, Gross Teaching Quotient) may not align with providers’ timetabling systems – as such, it may require complex work by the provider to extract relevant data. These methods may not also fully capture the ways in which teaching delivery has evolved – and may continue to evolve. For example, many aspects of academic delivery that are important to the student learning experience (e.g. office hours, project supervision, other forms of academic support) are not

			<p>captured in these methods. Asynchronous learning may also be difficult to measure through the methods outlined in the consultation document, as both students and instructors take on different roles, which may not be measured by taught hours or independent learning.</p> <p>According to the providers participating in the pilots that sent out a student survey on contact hours, challenges in ensuring students were engaged with the survey, the complexity of the survey questions and the timing of the survey (i.e. while students are completing assessments for the first term of the academic year) meant that response rates were very low.</p>
14	<p>What forms of contact and learning (e.g. lectures, seminars, work-based learning) should and should not be included in a measure of teaching intensity?</p> <p>(pages 28 and 29)</p>	N/A	<p>Please explain:</p> <p>If some form of a teaching intensity measure is to be a component of subject-level TEF, it will need to include ways to capture ‘non-traditional’ forms of learning and other forms of interaction between academics and students that take place outside of a formal classroom setting (e.g. project work, participation in workshops, office hours). Overall, the unintended consequences of introducing such a measure need to be fully weighed before determining whether or not to introduce it. As noted in our response to question 13, we strongly disagree with the implementation of this measure as it currently stands and would recommend further consultation with providers – particularly those currently participating in the subject-level pilots – before proceeding any further.</p>

<p>15</p>	<p>What method(s)/options(s) do you think are best to measure teaching intensity? Please state if there are any options that you strongly oppose and suggest alternative options.</p> <p>(pages 29 to 31)</p>	<p>N/A</p>	<p>If you have an alternative suggestion, you may wish to consider: meaningful for students, value for money, generalisability across the sector, accuracy/validity of measures, supporting diversity of provision:</p> <p>As indicated in our response to question 13, we strongly disagree with the implementation of a measure of teaching intensity in its current form. We would recommend the results of the first year of the subject-level pilots be fully analysed before determining how to proceed with this measure. A measure that is more focused on learning intensity may be more valuable in meeting the intended objectives of this metric, all while recognising the shared role of the provider and the learner in ensuring a positive learning experience.</p>
<p>16</p>	<p>Do you have any other comments on the design of subject-level TEF that are not captured in your response to the preceding questions in this consultation?</p> <p>(page 32)</p>	<p>N/A</p>	<p>Please explain:</p> <p>Overall, Alliance universities welcome the introduction of subject-level TEF and recognise the potential it has to drive continuous improvement in teaching. The Alliance universities participating in the subject-level TEF pilots have found it useful to see their metrics at this level and are considering how this information can be used to encourage innovation and improvement. However, the exercise needs to be conducted in a manner that is founded on high quality information that is easy to understand for all involved – particularly students. We hope DfE and the OfS will continue to work with the sector to ensure the robustness of the data used to determine TEF ratings, and that the exercise is ultimately able to capture the</p>

			diverse forms of teaching excellence that are present across the diverse range of UK higher education providers.
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