

# INDEPENDENT REVIEW OF TEF UNIVERSITY ALLIANCE RESPONSE

## Background

The Teaching Excellence and Student Outcomes Framework was proposed in the Higher Education: Success as a knowledge economy White Paper, published in May 2016. Its purpose is to recognise excellence in teaching and student outcomes at higher education providers, and in particular aims to achieve the following objectives:

- To better inform students' choices about what and where to study;
- To raise esteem for teaching;
- To recognise and reward excellent teaching; and
- To better meet the needs of employers, business, industry and the professions.

The TEF rates providers Gold, Silver or Bronze for the quality of their teaching, learning environment and graduate outcomes. Institutions eligible for TEF, but which do not have sufficient metrics, can be given a one year Provisional award.

The first assessment outcomes were published in June 2017, with a further round of assessments published in June 2018.

Participation in TEF has been voluntary to date, but from academic year 2019/20, it will be mandatory for providers registered with the Office for Students (OfS) which have more than 500 students.

In January 2018, the OfS formally adopted the TEF as its rating system for quality, as provided for under Section 25 of the Higher Education and Research Act 2017 (HERA).

## **Overview**

The Independent Review of TEF, led by independent reviewer Dame Shirley Pearce, has been asked to report on the following:

- the process by which ratings are determined under the scheme and the sources of statistical information used in that process;
- whether that process, and those sources of statistical information, are fit for use for the purpose of determining ratings under the scheme;
- the names of the ratings under the scheme and whether those names are appropriate;
- the impact of the scheme on the ability of higher education providers to which the scheme applies to carry out their functions (including in particular their functions relating to teaching and research);
- an assessment of whether the scheme is in the public interest; and
- any other matters that the appointed person considers relevant.

The formal call for views ran from 18th January to 1st March 2019.

The University Alliance's response was overseen by the Head of Policy, in consultation with the University Alliance's Teaching & Learning Policy Network and other public affairs and policy leads.

## **Interaction with other TEF developments**

The Independent Review will have no impact on the current round of provider-level TEF, launched in October 2018.

This round of TEF, for academic year 2018/19 (also known as TEF Year Four) will see a further set of provider-level outcomes published by the OfS in June 2019. The Review will be able to make recommendations in relation to the system for subsequent provider-level ratings.

The Independent Review will be developing its recommendations at the same time as the second year of pilots for subject-level TEF. The pilot findings will be available by summer 2019 and will then influence the design of the final version of subject-level TEF.

The recommendations of the Independent Review should also be available at that time, and influence the TEF's final design.

The OfS is planning to move to full implementation of subject-level TEF in academic year 2019/20 (TEF Year Five). The application window for subject-level TEF will open in academic year 2019/20 with the assessment process running through to academic year 2020/21.

The OfS expect to publish the first outcomes of subject-level TEF in spring 2021.

## **University Alliance's Response**

The University Alliance's response to the call for views was overseen by the Head of Policy, in consultation with the University Alliance's Teaching & Learning Policy Network and other public affairs and policy leads.

Below are our responses in full. We did not answer questions which individual institutions were best placed to answer.

University Alliance  
March 2019

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

- University Alliance backs a robust, independent national framework which puts the principle of 'enhancement' at its centre: driving up the quality of the overall educational experience to enable students to learn effectively. This national framework should dovetail and complement the existing quality assurance regime, not compete with it. This will build confidence in the higher education system. No provider should be afraid of additional scrutiny and accountability.

- There need to be rapid changes and reform if the scheme is to remain in the public interest over the long-term. We are concerned the government has given the TEF far too wide a set of objectives and are not convinced the current framework fulfils any of them. We accept it is complicated to design and deliver a national framework. However, expecting it to achieve multiple purposes (which may be in tension with each other) means it is very challenging to be consistent and coherent across 300+ higher education providers.

- We propose a first step is to reposition the TEF as the "Teaching and Learning Enhancement Framework", scrapping the current "Teaching Excellence and Student Outcomes" name. This makes a clear statement of intent about the core principle of enhancing provision. The system must put the onus on providers themselves to drive up quality and standards. It is perverse to design an accountability framework which puts graduate employment and income outcomes on a pedestal, above the actual teaching and learning experience. Our proposed repositioning also retains the current acronym.

**The Government has stated that the purpose of the TEF is to: (a) better inform students' choices about what and where to study; (b) raise esteem for teaching; (c) recognise and reward excellent teaching; and (d) better meet the needs of employers, business, industry and the professions.**

**These purposes fall into two main areas: providing information, and enhancing the provision of higher education. Which of these is the most important.**

- The Government has stated that the purpose of the TEF is to: (a) better inform students' choices about what and where to study; (b) raise esteem for teaching; (c) recognise and reward excellent teaching; and (d) better meet the needs of employers, business, industry and the professions. We believe that the intention to give all four broadly equal weight is not credible.

- We do not believe the TEF, as it stands, is a robust and effective driver of student choice, although it might enable applicants to filter options. The TEF cannot be all things to all people. The drive for a one-size-fits-all TEF framework to inform choice risks undermined the purpose to enhance provision.

- The TEF measures relative performance between institutions with similar student bodies. This is the right approach if the intention is to enhance provision but not, if the intention is to provide information, as there is no evidence that applicants compare institutions on this basis. We propose the OfS in future adopts a 'hippocratic' position towards the TEF - that seeking to improve the information function should not harm the enhancement function. To support this, we need to accelerate work in developing a robust "value-added" metric, where entry point data is positioned against a defined outcome. This needs to build on the lessons from previous pilots of 'learning gain' schemes. The prize is critical to TEF's future value in

demonstrating the relationship between teaching inputs and learning outcomes.

- The student market is complex. It is not clear either DfE, in its original conception, or OfS since, has developed TEF with a robust understanding of students' customer journey and decision making. There is limited evidence to date that applicants, careers advisors or the public understand either the purpose of the TEF overall or what the specific awards denote. There is limited evidence the TEF is capable of breaking the hold of other more established information sources.

- All these shortfalls would be exacerbated at this point by extending the TEF across tens of thousands of undergraduate courses subdivided into very broad subject areas. We would advise pausing and reviewing the roll out.

We have seen no answers to the two most basic questions: firstly, how should a student balance a differing subject award and an institutional award? And secondly, what should students infer from missing ratings due to limited data (or awards drawing on institutional submissions)? This risks undermining providers' legal and ethical responsibilities to give accurate information about their courses and programmes. This is crucial, in particular, for students with protected characteristics or those with wider practical/personal limitations on their choices, for instance because of caring responsibilities.

### **Should there be any other purposes for TEF?**

No. It should be focused tightly on enhancement. We caution against mission creep with the TEF taking on new 'regulatory' functions, rather than OfS using its wider legislative powers. The recent inclusion of 'grade inflation metrics', for example, confuses the scheme's purposes. It is right to challenge poor practice over degree classifications to build public confidence in

standards and quality - but basing these judgements purely on metrics, risks not identifying grade improvement down to enhanced learning/teaching environment or a return on investment over time.

### **Are the criteria used in TEF appropriate?**

The current set of criteria are not well aligned with the current set of metrics. University Alliance recommends stripping back the whole framework to make it clear which criteria are underpinned by which metrics and which are not - with on balance, fewer metrics and tighter, more granular criteria. This mirrors the wider quality assurance system.

All this should open up a greater role for qualitative assessment, which we would advocate increasing across the scheme as a whole. TEF needs to incentivise student engagement in the overall process (pivoting away an over emphasis on NSS results) as well as recognising students' role in course and programme design. We would also continue to argue for a wider and less rigid definition of graduate outcomes, which better demonstrate the wider social, cultural and civic impact of education.

Overall, the review should set the bar high to justify future changes as the framework evolves, in order to avoid creating confusion, complexity or additional administrative burden. The TEF needs to flex to support future innovation and diverse provision - but not at the cost of undermining public confidence.

**There is no direct measurement of teaching quality currently available. The TEF uses existing data as indirect measures of teaching quality. These measures are known as “proxies”.**

## **Are the metrics used in TEF the best proxies for measuring the TEF criteria? If no, what metrics would be more suitable proxies?**

It is axiomatic that, without the inception of major new forms of data collections, we are limited in developing new metrics - in short we can only make best use of the public data available.

This means University Alliance is less concerned about proxies and the precise balance between them than with: (a) their alignment to the overall criteria (see above); (b) their statistical quality and rigour, especially if we are to move to small nested sample sizes at the subject level; (c) the high level balance between metrics/proxies and qualitative evidence.

We would counsel against the inclusion of novel proxies or metrics that have not been well tested and may be susceptible to data quality problems - without sufficient controls and filters these could disproportionately benefit or disadvantage certain institutions.

**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.**

**Should the metrics be benchmarked to allow for difference in a provider's student population? Does TEF benchmark for the right factors?**

Benchmarks are a vital in giving a fairer view of provider performance.

There is an issue with benchmarking 'stability', however. In some cases, institutions will be reliably benchmarked against broadly the same group of peers over an extended period of time. In others, significant changes in entry tariff or subject mix



over short periods will cause instability in the benchmarking pool and lead to distortive effects.

This creates the risk that an institution on a strong strategic trajectory and improving its real performance, might still emerge from TEF as bronze. This cannot be right. It is not fair on that hypothetical institution, it fails the test against confusing results and it discourages innovation. OfS officials should be commissioned to produce research into benchmarking stability for different providers. This is an empirical question that can be derived from the data.

There also remain significant concerns about the absence of any true regional or area-type benchmarking to take into account geographical factors. We need to consider the different factors that can impact the draw of different institutions, even when they are situated close together. Together, these play a very important role in observed performance on metrics, even when benchmarked by other factors.

All these issues can be reconciled if the role of qualitative assessment in the scheme overall is increased relative to the overly domineering role of metrics at present.

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

**What are your views about the balance of quantitative and qualitative evidence considered in arriving at ratings? Are there any other aspects of the process that you wish to comment on?**

The role of rigorous qualitative evidence should be increased to bring it into line with the weight put on metrics-based evidence. Over time, this will become necessary as we would expect to

see a steady convergence towards the mean, especially if providers seek actively to target metric performance and eliminate negative flags. We call for much stronger guidance on expanding the use of qualitative evidence to be available.

One area where qualitative evidence should be used more is in assessing student outcomes. The TEF ought to take account of social impact and civic goods, especially in light of the resurgent 'civic university' agenda. It continues to be reductive to understand the quality of outcomes only in terms of employment and income.

**Are the purpose(s) of TEF met by (a) awarding a single rating; (b) with three levels of differentiation, plus a fourth rating for those unable to be assessed? (C) ratings named Gold, Silver, Bronze and Provisional?**

We should not rule out a future iteration of TEF with a single rating, if the serious issues with the current system are not resolved.

The current award structure confuses rather than clarifies the public's view on quality and performance in higher education. The bands are so wide that they contain within them widely different levels of real performance. The real problem is not so much how students are supposed to compare between a gold and a silver award (which is tricky enough), it is in how students are supposed to compare between a silver and another silver (or other award levels).

In addition, bronze awards create a notion of poor quality and a provisional award may lead people to conclude the provider has not been open with assessors or even that it is in jeopardy.

This is compounded by the obvious problem of differing awards at the institution and subject level, as set out above.

## **What alternatives you would suggest: (a) for provider-level TEF? or (b) subject-level TEF?**

### Provider-level TEF

Overall, our members want to retain a reformed provider-level TEF, with more detailed analysis of awards decisions.

On balance, there is a need for an overall institutional award to demonstrate outstanding provision, whether it is labelled gold or not. This can be more reliably explained to end users as “better than the average provider with similar subjects and students”.

We would advise, however, examining the case for bringing together the other categories under a more neutral accreditation (for example, ‘TEF Quality Assured’). This is to reflect the reality providers have all met the core UK requirements for quality assurance. We must back the current quality assurance regime and explain that this is not a ‘low bar’.

No change, however, should be phased without careful consultation and modelling.

### Subject-level TEF

We recommend examining moving away from metric aggregates and consider a new type of award that recognises outstanding programmes.

Providers could enter programmes on the basis of a portfolio comprising quantitative and qualitative data that demonstrate excellence. Those would single out pioneering exemplars of outstanding programme design, delivery, responsiveness to student voice and outcomes, while not fitting provision into a narrow straitjacket in order to achieve a high award.

This will be better aligned to the way applicants actually make choices - between institutions and programmes, not broad subject categories. It would also enable OfS and providers to enhance the quality of teaching and learning across the country - along with existing improvement programmes run by professional bodies and networks.

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

It is a step forward, despite the issues we have set out. It makes no sense for a higher education system to have a REF but not a TEF-style framework. This would leave an unbalanced and distorted public understanding of the higher education system.

University Alliance members confirm the TEF has increased the focus on teaching and learning. It has created a new source of comparative and standardised management data which can help them to make their own assessments of performance and of the relative success of teaching and learning activity, with different sections of the student demographic.

Many institutions used sophisticated internal metrics analysis before the TEF was introduced - in those cases the framework has supplemented these systems, whereas in other cases it has catalysed investment in stronger systems.

University Alliance members also confirm the TEF has helped support internal and external business cases for new funding/ resources targeted at areas of need that had not identified before - in particular, for students with protected characteristics or studying in a non-traditional mode.

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

This consultation response sets out our serious reservations about the current TEF design and model. Overall, we are concerned additional resources and effort have been diverted into activity which may boost TEF measures but which do not genuine enhancement. Our members' individual consultation responses will confirm how this plays out on the ground.

## **Does TEF help you as a student/provider/employer?**

It has enabled University Alliance, as a representative body, to engage in a richer discussion about learning and teaching with government and other stakeholders. TEF has created a vehicle for us to explain our members' intrinsic teaching and learning missions more strongly and to make a case for more distinctive, innovative and diverse provision.