Department for Business, Innovation & Skills

Teaching Excellence Framework Technical Consultation – Response Form

Name/Organisation: Heads of Educational Development Group

Please tick the box that best describes you as a respondent to this consultation:

	Respondent type
☐	Alternative higher education provider (with designated courses)
☐	Alternative higher education provider (no designated courses)
☐	Awarding organisation
☐	Business/Employer
☐	Central government
☐	Charity or social enterprise
☐	Further Education College
☐	Higher Education Institution
☐	Individual (Please describe any particular relevant interest; parent, student, teaching staff etc.)
☐	Legal representative
☐	Local Government
☐	Professional Body
☒	Representative Body
☐	Research Council
☐	Student
☐	Trade Union or staff association
☐	Other (please describe)

Question 1 (Chapter 1)
Do you agree with the criteria proposed in Figure 4?

☐Yes ☒No ☐ Not sure

Please outline your reasons and suggest any alternatives or additions.

- We agree with the three aspects but we are less convinced by the criteria set out for each. These need reconsidering. The current criteria implicitly promote a very passive role for the student: there should be more emphasis on the quality of <u>learning</u>.

- There should be a move away from measures of student satisfaction (which is not a proxy for quality) to measures of engagement, that is, use UKES data rather than NSS, and use TEF as a driver to encourage institutions to adopt UKES.

- The relative weighting that will be given to the core metrics versus the additional material and contextual information is unclear. The additional information will be important in countering the concerns regarding the reliability and validity of the core metrics.

- The criterion 'Students' academic experiences are tailored to the individual, maximising rates of retention' suggests a degree of bespoke-ness that may be impossible at current fee levels. We suggest instead adapting one of the phrases from the comments about what panels will be looking for such as: 'Students' individual learning needs are recognised, understood and met'.

- A criterion for 'institutional culture recognises excellent teaching' should be included. Indicators of this might include strategies and policies that value excellent teaching and teachers equally with research, and evidence that these policies are implemented consistently across the provider. For example, the proportion of academic staff in each department promoted and otherwise recognised for excellent teaching compared with those promoted for excellent research; support, resources and time made available for staff and students to develop teaching and learning; investment in teaching-related CPD for staff throughout their careers, and evidence that this is widely taken up and has a positive impact.

- Focus on identifying developmental schemes such as peer observation of teaching, rather than an OFSTED type approach of grading and judging. Assessors should look at the ethos around opportunities for staff to engage in development.

- Non-continuation is more sophisticated an issue than academic support and learning environment.

- Employment metric: A six-month post-graduation data point is too short; this should be at least 12 months. Contextualisation is key: regional factors (incomes in the North East are lower than London, for example, but graduates in London face more competition from those moving into London), disciplines and professional issues (for example, job markets for arts graduates are very different to those for Medicine).

- Evidence should be on employability outcomes rather than EMPLOYMENT per se - Graduate attributes, for instance.

- Take GPA out – there is no evidence that this will enhance record of achievement or to be immune to grade inflation. If GPA is to be used, further work needs to be done to provide the sector with confidence that it is appropriate measure of achievement and to achieve clarity over what a national GPA scale would look like and be accepted by all.

Question 2 (Chapter 3)

A) How should we include a highly skilled employment metric as part of the TEF?

- While it could be useful to try to develop this metric, its success depends on how 'highly-skilled job' and learning gain measures are defined.

- If 'highly skilled' does not recognise caring professions and the arts (which have huge social value) this will be a challenge for many institutions and will in time impoverish society, as well as failing to recognise the huge contribution that arts and the media make to the economy.

B) If included as a core metric, should we adopt employment in Standard Occupational Classification (SOC) groups 1-3 as a measure of graduates entering highly skilled jobs?

☐ Yes   ☒ No   ☐ Not sure

C) Do you agree with our proposal to include all graduates in the calculation of the employment/destination metrics?

☐ Yes   ☒ No   ☐ Not sure

Please outline your reasons and suggest any alternatives.

- Some will not want to enter employment or highly skilled employment. This may be an active choice. They should not be included.

- Graduate employment outcomes must also recognise the self-employed and those who do not enter recognised employment immediately; a 6-month sampling point is too soon for some disciplines (eg in the arts); volunteering is a valuable option as part of induction to or preparation for future highly skilled paid employment; internships can be very poorly paid but reap benefits in the future.

Question 3 (Chapter 3)

A) Do you agree with the proposed approach for setting benchmarks?

☐ Yes   ☐ No   ☒ Not sure

B) Do you agree with the proposed approach for flagging significant differences between indicator and benchmark (where differences exceed 2 standard deviations and 2 percentage points)?

☒ Yes   ☐ No   ☐ Not sure

Please outline your reasons if you disagree.

- If we can be satisfied that the benchmarking data is sound then flagging seems reasonable, but there will need to be opportunities for dialogue with the institutions concerned before flags are confirmed and made public.
- Fig 5 - Non-continuation data by ethnicity, sex and disability should be included
- The validity of benchmarking will be compromised if there are low numbers of students with certain characteristics.

Question 4 (Chapter 3)
Do you agree that TEF metrics should be averaged over the most recent three years of available data?

☒ Yes   ☐ No   ☐ Not sure

Please outline your reasons and suggest alternatives.

- A 3-year average is essential to overcome the impact of cohort effect. BUT HEIs should also be able to indicate a trajectory for improvement based on longitudinal data.
- This approach will make measuring the impact of interventions difficult, so needs to be complemented with additional information (potentially as part of the institutional submission).

Question 5 (Chapter 3)

Do you agree the metrics should be split by the characteristics proposed above?

☐ Yes   ☒ No   ☐ Not sure

Please outline your reasons and suggest alternatives.

- The proposed splits are overly simplistic. Add gender, range/types of disability (SLD is different to mobility, for instance), domicile should include living at home as well as national location. All of this needs to consider intersectionality and multiple deprivation.
- Route of entry is also important - VIth Form College, independent school, access, FE College, etc.

Question 6 (Chapter 3)
Do you agree with the contextual information that will be used to support TEF assessments proposed above?

☐Yes   ☐No   ☒ Not sure

Please outline your reasons and suggest any alternatives or additions.

- It is difficult to say at this stage. Contextual information is deeply important, but care must be taken with permitting the addition of information as suggested in paragraph 93 that it does not skew outcomes or that institutions use to justify their approach and use this to their advantage. Also how the assessors might use this to interpret the contextual information is an important consideration.

- Age - categories are too broad.

- Entry qualifications are not standardised across the sector - and tariffs (expectation) and qualification (outcome) are not the same thing.

- Sex - needs to reflect gender-related questions, possibly including gender identity and orientation as well, if this data can be collected.

- Domicile - Should this be bullet (i) - part of (h) typo? What is the plan on BREXIT for EU categories?

- Data maps – there needs to be more detail on the rationale for including these: will they be provided to HEIs, or is this data that HEIs are expected to provide? What is the purpose of this data? Is it seen as a plus that HEIs can be seen to be moving 'working class' students to middle class areas? What is good about this? Wherefore economic regeneration?

Question 7 (Chapter 3)
A) Do you agree with the proposed approach for the provider submission?

☒Yes   ☐No   ☐ Not sure

B) Do you agree with the proposed 15 page limit?

☐Yes   ☒No   ☐ Not sure

Please explain your reasons and outline any alternative suggestions.

- We agree there should be a limit, but how was 15 pages arrived at? There should be some (modest) variation in length depending on size of institution. Large, multi-disciplinary institutions should have a longer allowance than smaller specialist providers, e.g. up to 20 pages. When discipline-based assessments are introduced, this will be resolved by allowing a set word count per discipline.

- Clarity over the relative weighting given to each of the three aspects, and the criteria within each, is needed. For example, could a good DLHE score but

weak NSS score balance each other out? Or would the criteria and metrics for 'teaching quality' carry more weight? Would there be context-specific interpretation of relatively high/low scores on any of the metrics, e.g good DLHE scores from institutions where graduates are more employable simply because of the reputation of their university?

- Why no hyperlinks allowed? Inclusion of hyperlinks would reflect the way universities present their information and the OER agenda, and these would be a good way to explain things easily and allow assessors to quickly verify claims, as long as it was clear that all essential information should be within the body of the 15-page submission.

Question 8 (Chapter 3)
Without the list becoming exhaustive or prescriptive, we are keen to ensure that the examples of additional evidence included in Figure 6 reflect a diversity of approaches to delivery. Do you agree with the examples?

☐Yes   ☐No   ☒ Not sure

Please outline your reasons and suggest any additions or alternatives?

- The list of examples may be deemed appropriate if, during the pilot, it is shown that it is possible to demonstrate everything necessary in the metrics + 15 pages of additional evidence. This is something the pilot should test.

- The challenge will be to ensure that a) the list does not become a 'checklist' (as is often the case with indicative lists), and, b) there is transparency about other evidence that is used and the extent to which this is valued.

- In terms of whether the evidence listed will provide the assessors with all the material they need to make a clear judgment on teaching quality, there are still too many intangibles and a 'looking back at what's gone'. There is nothing about innovation and creativity, for example, so the evidence may work only as a retrospective benchmarking exercise.

- Teaching quality indicators should include the *process* of learning as well as inputs and outputs.

- Indicators of student engagement are important and we would support their inclusion however not all institutions use UKES and the cost of it is part of an expensive package from the HEA that not all institutions will subscribe to. Unless this becomes a NSS type survey that is administered nationally it is hard to see how it could become a reliable measure/proxy. If it is adopted it is also worthwhile including as evidence how UKES is used to improve learning within an institution and later at disciplinary level.

- Evidence of the use of learner analytics may be useful, but this is not the only way to track and monitor students' progress and development. The inclusion of this example could be somewhat reductive if the lack of learner analytics is seen as a negative.

- The definition of 'teaching 'intensity' will be key. If we want to develop autonomous learners, do we want to push an increase in contact hours?

Unintended consequences need to be considered carefully here – staff teaching loads, spoon-feeding students etc. The role of peer-assisted learning should be clear in any measure of 'teaching intensity'

- It would be valuable to include how an institution creates an environment that supports and engages staff in their teaching professional development across their career, not just as new to teaching academics, and the effectiveness of such approaches. This could include how staff are supported to become Fellows of the Higher Education Academy either through a post graduate certificate or through experiential routes and subsequently as Senior or Principal Fellows.

Question 9 (Chapter 4)
A) Do you think the TEF should issue commendations?

☒Yes   ☐No   ☐ Not sure

B) If so, do you agree with the areas identified above?

☒Yes   ☐No   ☐ Not sure

Please indicate if you have any additional or alternative suggestions for areas that might be covered by commendations.

- Commendations should include support/environment for HEAR and additional activities such as professional development of students to develop employability and support students in becoming 'fully rounded persons'.
- Commendations should be included for the provision of a wider, connected curriculum - supporting development of different areas within and beyond the academic curriculum - e.g. Outreach work/ATHENA SWAN work in schools/global perspectives/community and social orientation/peer-assisted learning schemes.
- Commendations should be included for inclusivity in the curriculum (widening out the discussion regarding WP students to include ALL students).

Question 10 (Chapter 4)
Do you agree with the assessment process proposed?

☐Yes   ☐No   ☒ Not sure

Please outline your reasons and any alternative suggestions. The proposed process is set within a relatively tight timescale, reflected in the key dates included in Annex B. Responses should be framed within this context.

We have a number of reservations concerning the process:
- To be assured that assessors will be able to come to robust decisions, we need to see what the standards for the criteria will be, as these apply to

assessors' judgements on the additional evidence. Therefore, the pilot must be *very* open about how assessors have come to their conclusions.

- There is a serious risk that this will become the same kind of political game as the NSS and the REF.

- The process lacks opportunities to see institutions in action and evaluate the extent to which the written submission is a true representation of the institution. Including site visits would discourage gaming.

- The timescale puts pressure on assessors to make quick decisions rather than considered ones.

- The TEF is more likely to encourage institutions to retrench and not take risks, so tried and tested methods are likely to be preferred over innovation and creativity.

- The bureaucracy associated with TEF could become substantial; this would be useful to test in the pilot.

Question 11 (Chapter 4)
Do you agree that in the case of providers with less than three years of core metrics, the duration of the award should reflect the number of years of core metrics available?

☐Yes   ☒No   ☐ Not sure

Please outline your reasons.

- If they don't have three years of data they should have a 'pending' result.

Question 12 (Chapter 5)
Do you agree with the descriptions of the different TEF ratings proposed in Figure 9?

☐Yes   ☒No   ☐ Not sure

Please outline your reasons and any alternative suggestions.

- The difference between excellent and outstanding are not clear. Are they not just synonyms? What are the common criteria?

- With reservations on the reductive nature of these definitions, could this be moved in line with OFSTED (Iestyn for Wales) categories and definitions as parents understand the categories?

- How will we ensure that the game doesn't become 'how to get an outstanding' rather than a real focus on how to drive up the quality of teaching and supporting learning?

Thank you for taking the time to let us have your views.

We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply ☒

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would you be happy for us to contact you again from time to time either for research or to send through consultation documents?

☒Yes   ☐No

BIS/16/262/RF