

Response to the Independent Review of the Teaching Excellence and Student Outcomes Framework (TEF)

28 February 2019

Background

The Government has commissioned Dame Shirley Pearce to carry out an Independent Review of the Teaching Excellence and Student Outcomes Framework (TEF). As part of this, a call for views was launched on 18 January 2019, with responses requested by 1 March.

The call for views focused on the following areas:

- The process by which ratings are determined under the scheme (for assessing quality in higher education) 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
- Any other matter that the appointed person considers relevant

An independent expert view of the statistical information used in TEF is to be commissioned separately.

The Academy has responded to three previous consultations related to the TEF. The first came as part of our response to the Government's Green Paper *Higher Education: teaching excellence, social mobility and student choice* (January 2016).¹ We also responded to the *Teaching Excellence Framework: technical consultation for year 2* (July 2016).² To which was appended an annex by Professor John McInnes.³ Most recently we responded to the *Teaching Excellence and Student Outcomes Framework: Subject-level* (May 2018).⁴

This response to the current call for views on the TEF draws heavily on and reiterates points made in all three previous responses. These positions were reviewed by the Higher Education Policy Development Committee in February 2019, who confirmed that they remained appropriate, subject to some minor updating.

Response

Do you support the aim of assessing the quality of teaching excellence and student outcomes across providers of higher education? Please explain why.

As the UK's body for the humanities and social sciences, the British Academy is committed to working alongside colleagues inside and outside of higher education providers to ensure that all students in the UK receive the highest quality teaching in the humanities and social sciences (HSS), and that the higher education system is structured and resourced in order to achieve this. As a result, we support efforts to ensure the provision of teaching excellence, across all institutions.

As we noted in our response to the Government's Green Paper: *Higher education: teaching excellence, social mobility and student choice* (January 2016, nos. 12-13), the skills engendered by rigorous teaching and learning in HSS disciplines are essential to the current and future health of the UK economy as demonstrated by the Academy's report *The Right Skills: Celebrating Skills in the Arts, Humanities and Social Sciences (AHSS)* (2017). HSS graduates are also in high demand by leading employers internationally (See Vitae's publication, *What do researchers do?* 2010. <https://www.vitae.ac.uk/impact-and-evaluation/what-do-researchers-do>). A well-designed system of assessing and rewarding teaching quality can inspire positive change in higher education teaching, encourage the development of innovative and effective pedagogies, and create an optimal learning environment for students.

The Academy, however, remains concerned that the metrics that are intended to capture teaching excellence are fundamentally flawed, as no quantitative metric exists that can adequately capture teaching excellence across the great diversity of teaching and learning approaches and environments found in higher education providers. In our response to the TEF *Technical consultation for year 2* (July 2016) we advocated for delaying the introduction of the TEF process until a shared understanding of 'teaching excellence' and an appropriate methodology for

¹ https://www.thebritishacademy.ac.uk/sites/default/files/British%20Academy%20Response%20to%20Higher%20Education%20Green%20Paper%20January%202015_0.pdf

² https://www.thebritishacademy.ac.uk/sites/default/files/TEF%20Technical%20Consultation%20Y2%20BA%20response%20%28website%29.pdf?_ga=2.213436306.786851559.1551172964-517119682-1537863111&_qac=1.149627138.1551263231.EAlalQobChMlZvTKuIXC3QIVzLXtCh16NQkWEAAAYASAAEgK9PvD_BwE

³ https://www.thebritishacademy.ac.uk/sites/default/files/CommentarySubjectLevelTEFConsultation_JohnMacInnes.pdf

⁴ https://www.thebritishacademy.ac.uk/sites/default/files/Documents/files/BA%20response%20to%20subject%20level%20TEF%20consultation_Final.pdf

measuring it was agreed. Crucially, three years on, there remains no robust and shared definition of teaching excellence.

We are less supportive of the TEF's aim of assessing student outcomes, as we believe this narrow focus on average salary and employment data ignores the many additional benefits which graduates bring to society and the wealth of skills and knowledge which they acquire.

The Government has stated that the purpose of the TEF is to:

- **Better inform students' choices about what and where to study**
- **Raise esteem for teaching**
- **Recognise and reward excellent teaching**
- **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 areas is the most important?

The Academy believes that enhancing provision should be the primary purpose of the TEF. This is also the area where we believe the TEF has the most potential for impact. We believe that the TEF should seek to support and enhance teaching in higher education providers in a way which reflects the core mission of these providers. Higher education providers are concerned with the advancement of knowledge and understanding, as well as encouraging innovation and creativity in the way in which their subjects are taught. A well designed and focused TEF should assess and reward teaching quality in way that will inspire and advance positive change in higher education teaching, encourage the development of innovative and effective pedagogies, and create an optimal learning environment for students.

While the TEF can certainly play a valuable role in enhancing teaching provision, it is less valuable as a source of market information. The *Evaluation of Provider-level TEF 2016-17 (Year 2)* published in January 2016 by the Department for Education, gave no indication that the TEF had had a strong, positive impact on prospective students to date. The report itself noted there was "... no evidence that using the TEF contributed to higher levels of applicant satisfaction with the information available to help make decisions, or the confidence that applicants had in the choices they made".⁵ As a result, the TEF is not proving to be effective as a market information tool and a continued focus on this as a purpose of the framework risks diluting the positive effect that may be obtained for improving teaching provision.

Should there be any other purpose for the TEF?

The Academy believes that the TEF should focus on enhancing teaching quality and provision. Any additional purpose risks diluting its effectiveness in this important area.

⁵ <https://www.gov.uk/government/publications/evaluation-of-provider-level-tef-2016-to-2017-year-2>, p. 16, no. 1.40.

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’.

Are the metrics used in TEF the best proxies for measuring the TEF criteria?

The Academy is concerned that both subject-level and provider-level TEF use metrics that fail to provide an accurate picture of teaching quality. In its response to the Government’s consultation on the Green Paper *Higher education: teaching excellence, social mobility and student choice* (January 2016) and to the TEF’s *Technical consultation for year 2* (July 2016), the Academy voiced its concerns regarding the use of these core metrics based on the National Student Survey (NSS), stating that they are not fit for purpose, for both substantive and technical reasons.

The Academy welcomes the reduction in the weighting of the NSS metrics for subject-level TEF but we remain sceptical of the value or reliability of the survey for the purpose of assessing teaching quality. The NSS questions are a measure of student satisfaction, which often does not provide relevant or reliable information to measure the quality of programmes, as it represents nothing more than a snapshot of student feedback at a single point at the end of a degree. Students also revise their opinions about the relevance and quality of different components of their degree after a year or two in employment, often coming to see courses in their degree, such as methods training, for which they may have shown little interest or enthusiasm at the time, as the most relevant for their careers (see the British Academy report *Measuring Up: International Case Studies on the Teaching of Quantitative Methods in the Social Sciences*, 2016).

As stated in our response to the consultation on subject-level TEF (May 2018, response to question 3) student satisfaction and teaching quality are different things (so the measures are of poor validity as proxies), the metrics as they stand do not differentiate among the vast majority of providers (so that there is very little variation), and there is a significant risk that they will not be able to suitably differentiate among subjects and/or that such differentiation will result from omitted variables that are not measured or controlled for in the NSS. A degree of flexibility in any metrics used to assess teaching quality must be present, and considerable weight should be given to the provider’s own written submission.

It is not at all clear that employability outcome measures teaching quality as opposed to such factors as the prior skills and knowledge of students, their socio-economic background, gender and ethnicity, the reputation of the provider and its regional location, networking and other activities students undertake during their course, their subject choice, government macroeconomic policy, and the general performance of the economy. Developments in these latter two elements may also impact on the usefulness and relevance for applicants of NSS data related to previous student cohorts.

Employment destinations within a short period of graduation are also a poor guide to an individual’s later career progress and LEO data does not provide information on the types of role in which graduates are working, or how their higher education course might have equipped them to do it. As a result, it is a particularly poor proxy for measuring teaching quality and unfairly represents those students who do not immediately enter into jobs of a certain salary after graduation which may be for many reasons.

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

The Academy believes that, if they must be used, metrics such as the LEO data and graduate employment outcomes should include more reliable data from self-assessment tax records, if they are to match the greater proportion of self-employed graduates which exist. This is particularly

important for creative arts graduates and those who may be self-employed, including those considered entrepreneurs. A higher level of matched graduates in the data would also provide a better reflection of the wider societal contributions made by many graduates, in particular from the arts, humanities, and social sciences, who the current criteria, metrics, and data do not accurately account for.

Proper weight should also be given to institutions narrative submissions, at both provider and subject-level, as providing important contextual information on teaching provision.

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?

The Academy supports the use of benchmarks as a positive feature of the TEF. Students are not a homogenous group and we believe that it is appropriate that the TEF continue to allow for differences in a provider's student population, to better reflect and represent the variety of students studying in higher education and to encourage providers to improve access, participation, and retention for all students. Benchmarks provide essential contextual data to help explain differences in provider results. Since graduate outcomes are heavily influenced by student characteristics, these must play a part in explaining differences in employment and earnings.

Does the TEF benchmark for the right factors?

We believe that the TEF should continue to contextualise data based on the characteristics of students, particularly where these are protected characteristics but also to allow for socio-economic background, which has been shown to be a major influence on student outcomes regardless of higher education provider.

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?

The Academy believes that a 'portfolio' of material, combining both quantitative and qualitative evidence potentially provides a better guide to teaching quality than any approach based primarily on standardised metrics. Qualitative evidence such as provider submissions is particularly important where the metrics are not suitable for providing an accurate picture of teaching quality, as in the case of data derived from the NSS. Providers could be encouraged to publicise such material and alert potential students to it, through such mechanisms as the Key Information Set (KIS); many providers already do this. This may also be of greater benefit and use to applicants and their families when making decisions.

It is important for the panels at both provider and subject-level to look very closely at and take account of providers' written submissions to understand the context of the teaching provision for some courses, including interdisciplinary ones, where there is significant variance between courses within the various subject areas. For instance, one would expect considerable difference in teaching

within the broad category of “creative arts & design”. Equally, one must consider how some disciplines may end up being split between different categories; for instance, in the case of archaeology, some BSc courses will be classified as “physical, material & forensic sciences” while BA courses fit within “history & archaeology” even though they are being taught in the same department. This may not be easily understood by prospective students when reading subject-level results.

The Academy is concerned that, should the assessment process for subject-level TEF fail to allow panels to fully consider the institutional and departmental context of teaching in assessing and rating a subject, there is a significant risk that higher education providers will attempt to align their governance structures and aggregation of subjects to correspond to the framework classification and in order to attain better ratings. This would constitute a costly reorganisation and a threat to innovation and diversity strategies within institutions. It could also lead to the closure of some study programmes or unhelpful pressure on some departments to conform to wider school or faculty policies which may not fit. Such standardisation could harm the choice and diversity of provision available to students in the long term.

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

More details on our previous TEF consultation responses, and on reports mentioned in this response, can be found at the following links:

Green Paper: *Higher education: teaching excellence, social mobility and student choice*, a response from the British Academy (January 2016):

https://www.thebritishacademy.ac.uk/sites/default/files/British%20Academy%20Response%20to%20Higher%20Education%20Green%20Paper%20January%202015_0.pdf

Teaching Excellence Framework: technical consultation for year 2, a response from the British Academy (July 2016):

https://www.thebritishacademy.ac.uk/sites/default/files/TEF%20Technical%20Consultation%20Y2%20BA%20response%20%28website%29.pdf?ga=2.225953692.786851559.1551172964-517119682.1537863111&gac=1.241356214.1551176641.EAIaIQobChMIzvTKuIXC3QIVzLXtCh16NQkWEAAYASAAEgK9PvD_BwE

With an annex by Professor John McInnes:

https://www.thebritishacademy.ac.uk/sites/default/files/CommentarySubjectLevelTEFConsultation_JohnMacInnes.pdf

Teaching Excellence and Student Outcomes Framework: Subject-level, a submission from the British Academy (May 2018):

https://www.thebritishacademy.ac.uk/sites/default/files/Documents/files/BA%20response%20to%20subject%20level%20TEF%20consultation_Final.pdf

The Right Skills: Celebrating Skills in the Arts, Humanities and Social Sciences (AHSS):

<https://www.thebritishacademy.ac.uk/publications/right-skills-celebrating-skills-arts-humanities-and-social-sciences-ahss>

Measuring Up: International Case Studies on the Teaching of Quantitative Methods in the Social Sciences:

<https://www.thebritishacademy.ac.uk/publications/measuring>

Are the purposes of the 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?**

The Academy believes that levels of differentiation in ratings are appropriate and suitable to the aim of enhancing excellence in teaching provision. A provisional rating for those institutions not yet in a position to be fully assessed, would also seem to be a fair addition.

The current three levels of differentiation and their naming are, however, quite crude, and do not reflect the complexity and nuance required to provide a clear picture for the intended purpose of enhancing the quality of provision.

The Academy believes that the current badging of institutions as ‘Gold’, ‘Silver’, and ‘Bronze’ is, by itself, a somewhat crude and simplistic rating system for what is a complex and detailed evaluation of the multifaceted and dynamic practice of teaching. It is also potentially misleading for applicants and may conflict with the aim of enhancing the quality and provision of teaching, as it is difficult to see how applicants would read beyond the current ratings to truly understand what they mean. Something which allows for greater granularity and which presents the information in a more disaggregated way would be more appropriate, so that it sets out more clearly what ‘Gold’, ‘Silver’, or ‘Bronze’ really look like in a way that will make sense to prospective students and their families. While there remains no robust and agreed definition or metric for what ‘teaching excellence’ really looks like, however, this will be difficult to achieve.

While applicants may value the apparent simplicity of the current awarding system, as suggested by the recent *Evaluation of Provider-Level TEF 2016-17* there is also evidence to suggest that the ratings are not fully understood. 43% of Gold providers stated that the TEF had, at least in part, impacted on an improved institutional reputation amongst potential applicants (23% amongst Silver providers and 0% amongst Bronze). Bronze providers were more likely to report a decline in reputation as a result of the TEF, with 25%, compared to 0% for Gold-rated institutions and 3% for Silver and reported concerns that a Bronze award may be viewed by applicants as an indicator of poor-quality teaching.⁶ Providing a more nuanced explanation of the ratings, alongside the basic classification, would help to alleviate these concerns as well as providing higher quality information to applicants to inform their decisions.

If you answered no, what alternatives would you suggest for provider-level TEF and subject-level TEF?

As stated above, both provider and subject-level TEF would benefit from providing ratings information which allows for greater granularity and which presents the information in a more disaggregated way, so that it sets out more clearly what ‘Gold’, ‘Silver’, or ‘Bronze’ really look like. If this is to be of the greatest benefit to applicants and their families, as well as to higher education providers, it will need to strike a balance between overly-detailed and technical language on the one hand and oversimplification on the other. The proposals recently made for how the outcomes of the Knowledge Exchange Framework might be presented provide an example of how this could be achieved.

⁶ *Evaluation of Provider-Level TEF*, p. 44, no. 3.57.

Has the introduction of TEF positively changed the educational experience of students (e.g. teaching and learning)? If yes, how?

The Academy believes that it is too early to tell whether TEF will have a long-term and meaningful positive impact upon the educational experience of students. There is, however, qualitative evidence that the TEF has helped to improve the symbolic value of teaching and the emphasis which providers place upon it.

Has the introduction of TEF negatively changed the educational experience of students (e.g. teaching and learning)? If so, how?

The Academy believes that it is also too early to tell whether TEF has negatively changed the educational experience of students.

The Academy believes, however, that the placing of the TEF firmly within a political context of marketisation and competition has limited the exercise's ability to enhance teaching and has led to negative perceptions and unnecessary pressures among academic staff that run counter to the TEF's aims.

As stated in our previous responses to consultations on the TEF, the Academy would highlight the fact that the best teaching generally follows the best research. Assuming a false dichotomy between research and teaching is therefore unhelpful, and there is a risk that the sector will lose this oversight with the splitting of responsibilities for teaching and research and the responsibility for the TEF and REF frameworks between the Office for Students and UKRI respectively. The fact that TEF continues to make no mention of research and research practices in its current framework suggests that this disconnect remains and this runs the risk of one framework negatively impacting upon the other. This also suggests that an important element is missing from TEF's understanding of what constitutes excellent teaching and that the educational experience of students may come to be negatively impacted if the relationship between teaching and research is not recognised in both the TEF and REF frameworks. It would be worth considering how to connect TEF with the incentive structures in the REF, and to break down any mismatch that might work against research-led teaching being at the heart of higher education provision.

Has the introduction of TEF impacted negatively on research and/or knowledge transfer? If so, how?

Work undertaken by the Academy has highlighted the importance of a nexus between teaching and research. As stated in our response to the previous question, there remains scope for the TEF, REF, and KEF frameworks to negatively impact upon each other if the interconnectedness of teaching and research activities is not recognised. By not allowing for the importance of teaching to research and vice versa, there is a risk that the TEF and REF could contradict one another in their aims.

Explaining your reasoning, what are the most significant costs of provider-level TEF and subject-level TEF?

As set out in our response to the Government's Green Paper on *Higher Education* (January 2016), the Academy is concerned that a truly robust TEF could grow to the scale and cost approaching the equivalent REF, without commensurate benefit to higher education provision.⁷ While it has not yet

⁷ Green Paper: *Higher Education*, p. 7, no. 23.

grown to this level, there is considerably greater time and cost involved in its increasing expansion, notably through the introduction of subject-level TEF.

Roughly half of the institutional and academic contacts surveyed for the *Evaluation of Provider-level TEF 2016-17 (Year 2)* (January 2019), reported deprioritisation of teaching activities due to increased administrative costs and burdens on time, and of these 38% and 39% respectively saw this as being partially, mostly, or wholly due to the TEF.⁸ At the same time, only 15% of applicants surveyed reported that they had made use of the TEF in helping them decide which institution to attend.⁹ At present, therefore, the TEF can be seen to be having an administrative and time-related cost which may negatively impact upon the teaching which it seeks to enhance, while not proving to be of great benefit to applicants in their decision-making. It is also unclear whether sharing of best practice and pedagogical development is being achieved.

The Academy believes that there may be long-term costs for teaching quality if the TEF continues to be separated from research, through a lack of integration between the TEF and REF. As highlighted above, this lack of cross-referencing between the two frameworks may come to undermine the overall quality of both teaching and research.

The burden and cost of the TEF has been significantly increased by the introduction of subject-level TEF. This could be decreased if the focus and purpose of the framework were purely to enhance provision, as suggested in our earlier answer. A focus on improving provision could benefit provision in all disciplines if managed correctly and measured in a robust manner.

Explaining your reasoning, what are the most significant benefits of provider-level TEF and subject-level TEF?

While there is some evidence that provider-level TEF is being used by applicants, it is clear that much improvement is needed in terms of awareness and the Academy believes that it is too early to see any lasting benefits of the TEF, particularly at subject-level.

A potential benefit of both provider and subject-level TEF may be the sharing of best practice, but there is currently little evidence that this is happening, and this potential may be lost by overreliance and focus on the collection and interpretation of metrics data, rather than the publication of more granular information. The management of the TEF by the Office for Students and of the REF by UKRI may also continue to make the sharing of best practice around the connected activities of teaching and research more difficult.

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

The Academy believes that the current design of the TEF, and in particular its use of metrics, disadvantages small providers, particularly in the creative arts, in a disproportionate way. Many graduates from these subjects go on to be self-employed and the current design of the TEF and the metrics used does not account for this pathway.

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

As noted above, the Academy believes that graduate outcome and LEO data should include self-assessment tax records. This would allow the TEF's metrics and data to better represent the

⁸ *Evaluation of Provider-level TEF 2016-17 (Year 2)*, p. 46, figure 3.8.

⁹ *Ibid*, p. 15, no. 1.33.

graduate population and this be less disadvantageous to those self-employed graduates. This would also benefit those subjects, such as the creative arts, where this is a more common graduate outcome. This would provide a more accurate reflection of the wider societal contribution of the graduate population, beyond income and employment measures.