

British Academy response to the Office for Students' consultation on the Teaching Excellence Framework (TEF)

17 March 2022

Background

This consultation is one of three linked consultations the Office for Students (OfS, the regulator of higher education in England) is conducting on its approaches to regulating student outcomes and to the Teaching Excellence Framework (TEF). The Academy has responded to all three consultations. This response focuses on the future of the Teaching Excellence Framework (TEF). There are areas of overlap between all three consultations and, where appropriate, these responses reference each other.

The Academy has responded to four 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 voice* (January 2016).¹ In the same year we also responded to the *Teaching Excellence Framework: technical consultation for year 2* (July 2016), to which was appended an annex by Professor John McInnes.² The Academy also responded to the *Teaching Excellence and Student Outcomes Framework: Subject Level* consultation (May 2018).³ Most recently, we responded to the *Independent Review of the Teaching Excellence and Student Outcomes Framework (TEF)* (February 2019), conducted by Dame Shirley Pearce and commissioned by the Government.⁴

¹ The British Academy (2016), *Green Paper. Higher education: teaching excellence, social mobility and student choice. A response from the British Academy.*

² The British Academy (2016), *Teaching Excellence Framework: technical consultation for year 2. A response from the British Academy; with an annex* by Professor John McInnes.

³ The British Academy (2018), *Teaching Excellence and Student Outcomes Framework: Subject-level. A submission from the British Academy.*

⁴ The British Academy (2019), *Response to the Independent Review of the Teaching Excellence and Student Outcomes Framework (TEF).*

This response to the current consultation on the future of the TEF draws on and reiterates points made in all four previous responses. It also speaks to and draws upon our responses to the two other OfS consultations being conducted and responded to in parallel.

The text-based responses are accompanied by a tick-box selection to indicate the level of agreement with each proposal. These options are: strongly agree, tend to agree, tend to disagree, strongly disagree, prefer not to say.

Response

Additional question: In your view, are there ways in which the policy intention (see the box 'The Purpose of the TEF' on page 12 of the consultation document) could be delivered more efficiently or effectively than proposed here?

[Note: the proposed phrasing is 'Our policy intention in rating providers is that the TEF should incentivise excellence in teaching, learning and student outcomes. The TEF should incentivise a provider to improve and to deliver excellence above our minimum baseline quality requirements, for its mix of students and courses. We intend that TEF ratings would create this incentive by putting a spotlight on the quality of providers' courses, influencing providers' reputations and informing student choice.]

The Academy agrees with much of the phrasing of 'The Purpose of the TEF', but we believe that including 'student outcomes' within its proposed remit dilutes its overall purpose and potential for spotlighting excellence in teaching and learning amongst providers and their courses, influencing their reputations and informing student choice. As we set out in more detail in our response to question 2 below, on aspects and features of assessment, it is not at all clear that employability outcomes measure teaching quality, as opposed to other factors specific either to students or to providers and which may lie out with the scope of providers or teaching to influence.

We would propose that the first sentence of the policy intention be re-worded as follows: 'Our policy intention in rating providers is that the TEF should incentivise excellence in teaching and learning'.

Question 1. To what extent do you agree with our proposal for *provider-level, periodic ratings*? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.

[Note: the proposal is for eligible providers to be awarded a TEF rating which reflects the quality of their undergraduate courses, and that these ratings should last for four years.]

- **Tend to agree**

The British Academy is the UK's body for the humanities and social sciences and, as such, we are committed to working alongside colleagues across the higher education sector to ensure that all students in the UK receive the highest quality teaching in SHAPE subjects (Social Sciences, Humanities and the Arts for People and the Economy). As a result, we support efforts to ensure the provision of teaching excellence, across all providers.

We believe that the proposal for provider-level, periodic ratings and to drop previous proposals for subject-level assessment will reduce what might otherwise have been considerable administrative and time-related costs. Such a burden might have negatively impacted upon the teaching provision which the exercise intended to enhance.

We agree with the evaluation, as set out in paragraph 24 of Proposal 1, that an exercise which did not include some subject-level information would not be sufficiently transparent. Incorporating subject-level information into provider-level assessments, by both qualitative and quantitative means, will help to provide valuable contextual information to assessors without the additional burden of a separate full subject-level review.

This administrative burden for providers and assessors alike will also be reduced by the proposed shift to a four-year cycle and this therefore seems a sensible development. We would like to see more clarity on what this would mean in practice. Paragraph 26 rules out interim assessments and we would support this as to do so would otherwise increase the burden on providers. It remains unclear, however, how ratings that may be three or four years-old are to provide prospective students with adequate and up-to-date information about the quality of teaching provision at a provider.

Whilst we agree that a longer gap between assessment cycles would better enable providers to identify and implement improvements and that better data transparency will go some way to helping these efforts, real improvement in teaching provision can only be achieved through the sharing of best practice and it remains unclear how the proposed framework would facilitate this. As we noted in our response to the Independent Review of the TEF in 2019, the publication of the more granular information to be found in both provider and student submissions will play an important role here.

The Academy would, once again, highlight that the best teaching is embedded in a culture that fosters excellent research. While this is mentioned in the section on 'Academic experience and assessment' as an element of the 'Student experience' in Table 3 on 'Features of excellence' in Annex B, there remain wider structural impediments to this in the sector. Assuming a false dichotomy between the two activities is therefore unhelpful and 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.

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.

Question 2. To what extent do you agree with our proposal for aspects and features of assessment? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.

[Note: the proposal is that two aspects should be assessed and rated: the student experience and student outcomes. The criteria for determining ratings for these aspects should be based on the extent to which very high quality and outstanding quality features are demonstrated for each of the two aspects].

- **Tend to agree**

As we have previously stated, including in our response to the Independent Review of the TEF in 2019, the Academy believes that the TEF should focus on enhancing teaching quality and provision, as the area where it has the most potential for beneficial impact.⁵ Any additional purpose risks diluting its effectiveness in this important area.

⁵ The British Academy (2019), *Response to the Independent Review of the Teaching Excellence and Student Outcomes Framework (TEF)*.

We agree that qualitative evidence submissions should play a greater role in assessment alongside the use of indicators and metrics. This may allow for a more nuanced assessment which is more appropriate to the range of subjects and disciplines on offer, as well as the range of types of provider. We also agree that 'student experience' as it is set out in Table 3 of Annex B is a more appropriate framework for understanding and assessing excellence for the purposes of the TEF than 'student satisfaction'.

There remain aspects of the proposed features of excellence, however, which we feel relate less clearly to the excellence of teaching provision. This includes many elements of the proposed 'student outcomes' aspect and the connection of these to baseline requirements relating to Condition B3 of provider registration.

As we have noted in our previous consultation responses on the TEF in relation to student outcomes, it is not at all clear that employability outcomes measure teaching quality, as opposed to other factors specific either to students or to providers.⁶ These can include the prior skills and knowledge of students, their socio-economic background, their sex and ethnicity, the reputation of a provider, and networking and other activities which students undertake during the course of their studies which may not relate directly to their chosen degree subject. Geographical aspects such as a provider's regional location as well as varying regional employment opportunities will also have a bearing on graduate outcomes and where they seek employment, but long-standing and often political factors underpinning these differences are far removed from the potential impact and influence of even the very best teaching provision.⁷

While the separate consultation proposals on a new approach to regulating student outcomes do propose taking many of these distinct demographic characteristics into account - including Index of Multiple Deprivation (IMD) quintile - as well as some further context for providers - as set out under Proposal 2 - there are also broader contextual factors which impact upon student outcomes, and which lie beyond the control of providers. These include government macroeconomic policy and the general performance of the economy, particularly at times of crisis such as during and in the aftermath of the coronavirus pandemic.

In our response to the 2019 Independent Review of the TEF, we also noted that retaining the focus on student outcomes as a key aspect of provider assessments, even though it may be removed from the name of the framework, continues to place the TEF within the wider political context of marketisation and competition, which limits the exercise's ability to enhance teaching and has also led to negative perceptions and unnecessary pressures among academic staff.⁸

Question 3. To what extent do you agree with our proposal for the rating scheme? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.

[Note: the proposal is to continue with the existing ratings of gold, silver and bronze, for both aspect and provider-level ratings. The OfS has rejected alternative labels as being 'too complicated' for public understanding.]

- **Strongly disagree**

⁶ The British Academy (2019), *Response to the Independent Review of the Teaching Excellence and Student Outcomes Framework (TEF)*.

⁷ Office for Students (2021), *A geography of employment and earnings: Autumn 2021*; see also 'Geography of employment and earnings' in the Office for Students (2022), *Consultation on constructing student outcome and experience indicators for use in OfS regulation*, at paragraphs 375-389.

⁸ The British Academy (2019), *Response to the Independent Review of the Teaching Excellence and Student Outcomes Framework (TEF)*.

The Academy believes that it is appropriate to retain levels of differentiation as part of the rating scheme. It also seems appropriate, as set out in paragraph 46 of Proposal 3, not to award a rating to a provider where there has been judged to be an absence of excellence.

We do not agree, however, with the proposal to continue using the rating categories 'Gold', 'Silver' and 'Bronze'. We believe this badging to be somewhat crude and simplistic given what should be a complex and detailed evaluation of the multifaceted and dynamic practice of teaching, as well as being of little help to prospective students or their parents when choosing a provider. This can be seen in the key findings from providers in the *Evaluation of Provider-Level TEF 2016-17*, where none of those providers who had received a 'Bronze' rating stated that the TEF had impacted on and improved institutional reputation amongst applicants as well as citing concerns that such an award may be viewed as an indicator of poor-quality teaching, rather than the high-quality provision which the rating may attempt to convey.⁹

The proposed categories and their explanations listed in Figure 2 under Proposal 2 and further discussed in Proposal 12 do not provide much meaningful information about what the ratings mean, aside perhaps from that proposed for 'Requires improvement'.

The TEF would benefit from providing ratings information which allows for greater granularity and which present information to the intended audience in a more disaggregated way. If published ratings are to be of the greatest benefit to both applicants and providers, they must strike a balance between overly detailed and technical language on the one hand and oversimplification on the other.

We do not fully follow the logic behind rejecting alternatives for these categories such as 'Commended', 'Highly Commended' and 'Outstanding', as set out in paragraph 52. It is unlikely that these would be any more challenging for audiences, including those who may be non-specialists, as similar language is used elsewhere, such as in the ratings used by Ofsted. Similarly, as Proposal 3 and Annex B on the ratings scheme propose defining each feature as either 'very high quality' or 'outstanding quality', it is unclear why similar language could not be used as the primary ratings categories, rather than just as additional explanation.

Question 4. To what extent do you agree with the proposal for where there is an absence of excellence? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.

[Note: the proposal is that where there is an absence of excellence, no rating should be awarded and instead there should be an 'requires improvement' rating given. This would be considered as part of OfS's general monitoring of quality and standards.]

- **Tend to agree**

As stated above in our response to Question 3 on the proposed ratings, it seems appropriate not to award a rating where a provider has been assessed as having an absence of excellence.

The Academy also agrees that, where no rating has been awarded to a provider in a devolved administration, that it should be up to the relevant authority to determine whether further investigation or action is required.

If no rating is to be given, however, more thought might be given to the value of a published outcome signalling that the provider 'Requires Improvement'. Whilst it is important to incentivise

⁹ Vivian, D., Skone James, A., Salamons, D., Hazel, Z., Felton, J. and Whittaker, S. (2019), *Evaluation of Provider-level TEF, 2016-17 (Year 2). Measuring the initial impact of the TEF on the Higher Education landscape. Research Report*, IFF Research, p. 44, no. 3.57.

development and improvement, given the negative implications that those providers awarded a 'Bronze' rating have previously highlighted, consideration should be given to the impact that a 'Requires Improvement' rating may have on a provider's ability to address these failings and to improve.

Question 5. To what extent do you agree with our proposal for provider eligibility? Please provide an explanation for your answer. If you believe the approach should differ, please explain how and the reasons for your view.

[Note: the proposal is that providers will need to satisfy baseline quality and standards requirements to be eligible to participate in the TEF and to retain a rating once awarded. The OfS are not proposing to continue with a 'provisional' rating.]

- **Tend to agree**

We agree with the proposals for provider eligibility.

While we had previously indicated that a 'Provisional' rating would be a fair addition to the ratings for those providers who had met quality requirements for TEF eligibility, but were not yet unable to apply for assessment, the proposal that this be dropped because there will not be any minimum set or minimum number of students required seems a sensible one.¹⁰

We agree that, while a provider may have a small student cohort or a high degree of statistical uncertainty about its performance in OfS indicators, this should not prevent it from showing that it delivers excellence for its students for its provider and student submissions; thereby receiving a TEF rating.

Question 6. To what extent to do agree with our proposal for courses in scope? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.

[Note: the proposal is that all a provider's courses, and the students on those courses, should be within the scope of a TEF assessment.]

- **Tend to agree**

These proposals align with what is well established within higher education datasets.

Question 7. To what extent do you agree with our proposal for provider submissions? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.

[Note: the proposal is that along with student submissions (next question) and the indicators generated by OfS, provider submissions would form part of the three main sources of evidence. This would be a written, qualitative, submission where they can provide evidence of excellence in relation to the experience and outcomes of their students, and would allow them to give more contextual information specific to them as a provider.]

- **Strongly agree**

The Academy supports the inclusion of written provider submissions to the TEF's assessment process. A portfolio of material, combining both quantitative and qualitative elements will provide

¹⁰ The British Academy (2019), *Response to the Independent Review of the Teaching Excellence and Student Outcomes Framework (TEF)*.

a more detailed and nuanced picture of the teaching provision at a provider, as set out in Annex C. We also welcome the proposal to give greater weighting to provider and student submissions alongside the indicators.

We agree with the proposal set out in Annex C not to be too restrictive on the types of evidence that a provider may draw upon to support their submission. This will help to incorporate and allow for diverse types of providers and their student populations, their particular context and the range of subjects that they may offer.

Written submissions will also allow for more relevant assessment of different forms of teaching provision, including interdisciplinary provision, and where there may be significant variance between courses across different subject areas. For example, as we stated in our response to the Independent Review of the TEF in 2019, one would expect considerable difference in teaching provision within the broad category of 'Creative Arts and Design'.¹¹

Equally, such qualitative submissions will help assessors to 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 and forensic sciences" which BA courses fit within "history and archaeology" even though they may be taught within the same department.

The proposed guidance for verification and guidance for submissions seems sensible and, if clear enough, may help to reduce administrative burden on providers and their named TEF Contacts. The proposed use of a template also seems sensible from an administrative point of view.

Question 8. To what extent do you agree with our proposal for student submissions? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.

[Note: the proposal is that along with provider submissions (previous question) and the indicators generated by OfS, a student submission would form part of the three main sources of evidence. This would be prepared independently of the provider's submission and would focus on the quality of student's experiences and outcomes.]

- **Tend to agree**

The Academy supports the proposed addition of an independent student submission in addition to a provider submission and data from indicators. This will contribute to a broader portfolio of material on which providers may be assessed for the purposes of the TEF and will help to better reflect the diversity of teaching and of the student population which exists across the sector. The proposal for student submissions to have the same scope as provider submissions also seems sensible in this regard.

The proposal for each provider to have a named TEF student contact, who would receive support in this role, seems a sensible one. It also seems appropriate to us for the student submission to be developed independently from the provider submission and the proposed page limit of 10 pages will also help to reduce administrative burden on students.

We agree especially with the proposal in paragraph 142 to allow the student submission to take a form other than a written one, in whole or in part. We will believe that this will make the process more accessible to a broader range of students and thus help enable submissions to be more representative of different elements of a provider's student body.

¹¹ The British Academy (2019), *Response to the Independent Review of the Teaching Excellence and Student Outcomes Framework (TEF)*.

While we see value in gathering student views on their experience of their course and provider, we consider the inclusion of their views on outcomes to be of less value to the purpose of the TEF. It is difficult to see how current students can accurately reflect on 'outcomes' beyond more immediate grades or results, while they are still actively engaged in undergraduate education. As the Academy has previously noted in *Measuring Up: International Case Studies on the Teaching of Quantitative Methods in the Social Sciences*, students can revise their opinions about the relevance or quality of different components of their degree after a year or two in employment, often coming to see certain aspects of their course, such as methods training, for which they may have shown little interest or enthusiasm at the time, as the most relevant for their careers.¹² As we have noted above, we do not consider student outcomes to be an appropriate focus for the TEF.

Question 9. To what extent do you agree with our proposal for indicators? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.

[Note: as set out in the response to the student outcome and experience indicators, this proposal is that the OfS would produce numerical indicators based on the NSS, and student outcomes indicators defined consistently with those proposed to regulate student outcomes through condition B3 of provider registration.]

- **Tend to disagree**

While the Academy agrees with the proposal to provide greater balance between indicators and written submissions as part of the TEF assessment process, we remain sceptical about the continued reliance on the NSS for the purpose of assessing teaching quality. The proposed removal of responses to the question on overall satisfaction set out in paragraph 153 is a sensible one, as is the proposed exclusion of question 26 relating to students' union representation. The five question scales set out in paragraph 152 bear more direct relation to teaching excellence, but the NSS itself nevertheless continues to present a snapshot of student feedback at a single point of their degree and is primarily a measure of student satisfaction, rather than a reliable source of information for measuring the quality of programmes.

The Academy disagrees with the proposals for measuring student outcomes and 'progression' and does not view them as appropriate for a framework intending to assess teaching excellence. We disagree with the proposed focus on students progressing to managerial or professional employment. As we have set out in our responses to the parallel consultations on 'Constructing student outcome and experience indicators for use in Office for Students regulation', and on 'A new approach to regulating student outcomes', student outcomes are the products of several factors, including institutional reputation, location, sex, ethnicity, socio-economic background, government policy and the performance of the economy.¹³ Destinations are therefore of limited value in assessing the quality of a course from which an individual graduated.

As we have noted in our response to question 23 of the consultation on constructing student outcomes and indicators, the proposed definition of managerial and professional employment should also reflect employment in roles and sectors which may not necessarily fit within SOC 2020 major groups 1-3, as well as the varied ways in which graduates of higher education contribute to society and the economy. SHAPE graduates, for example, are employed in a range of roles across a diverse range of sectors, as we have evidenced in our reports *The Right Skills* and *Qualified for the*

¹² The British Academy (2016), *Measuring Up: International Case Studies on the Teaching of Quantitative Methods in the Social Sciences*.

¹³ Belfield et al (2018), *The relative labour market returns to different degrees*, Institute for Fiscal Studies.

*Future.*¹⁴ Assessing providers against the proportion of students progressing to further study may be a more appropriate indicator for assessing teaching excellence.

We would also like to note that the proposed first iteration of this new approach to the TEF later this year would be relying for its indicators on data from the last four years which has been significantly impacted by the wider impacts of the COVID-19 pandemic. We would therefore question the extent to which this data offered a representative view of a provider's quality of teaching.

The Academy's views on proposed indicators are set out in more detail in our response to the consultation on constructing student outcome and experience indicators.

Question 10. To what extent do you agree with our proposal for expert view? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.

[Note: the proposal is to continue to use an expert panel of academics and students in the Review. They also propose retaining Chris Husbands as panel chair.]

- **Tend to agree**

We agree that the TEF should continue to be assessed by a panel with expertise in learning and teaching and that panel members continue to receive training and support for the role.

As set out in proposal 10 and Annex E, we agree that the panel should consist of representatives from both staff and students, as well as reflecting experiences of different types of providers and backgrounds. We would, however, like to add the importance of disciplinary or subject diversity to this expertise as part of the recruitment process. This will help to ensure that the full range of teaching and experience is represented in the panel.

On proposals for chair of the TEF panel, as set out in paragraph 197, the Academy believes that it would be beneficial to also have an additional chair or chairs from a different but complementary overseas higher education sector, for example Australia or New Zealand, in order to offer balance and a wider perspective on decisions.

We note a potential tension between the different types of expertise set out in paragraph 195 under Proposal 10. That assessment of a provider's delivery of excellence for its mix of students and courses should be assessed by those with expertise in learning and teaching seems appropriate and sensible for an exercise measuring teaching excellence. Those with experience of student experience and student outcomes making judgements about levels of excellence across providers with different mixes of courses and student groups seems somewhat different. It is also not entirely clear from the proposals for expert view whether the assessment of the latter group would carry more weighting than the former.

Question 11. To what extent do you agree with our proposal for the assessment of evidence? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.

[Note: The proposal is that assessment of evidence would consider both types of written submission (provider and student) as well as the indicators – the balance proposed is that the indicators would account for no more than 50% of the evidence and the two aspects would be equally rated for the other 50%.]

¹⁴ The British Academy (2020), *Qualified for the Future: Quantifying demand for arts, humanities and social science skills*; The British Academy (2017), *The Right Skills: Celebrating Skills in the Arts, Humanities and Social Sciences*.

- **Tend to agree**

We agree with the proposals to base overall assessments on balanced assessment of the different sources of evidence, both quantitative and qualitative, and that the ratings criteria should be applied to these pieces of evidence holistically.

We note that, while the proposals for features of excellence and ratings criteria outlined in Table 3 of Annex B do mention 'teaching', the proposal for assessment of evidence makes no mention of it. 'Student experience' and 'student outcomes' are not the same thing and, as we have mentioned above, we do not consider 'student outcomes' an appropriate area of assessment for a framework purporting to be focused on teaching excellence. As we have previously noted in our response to the Independent Review of the TEF in 2019, the Academy believes that the TEF should focus on enhancing teaching quality and provision and that any additional purpose risks diluting its effectiveness in this important area.¹⁵ We would therefore expect to see more mention of 'teaching quality' or 'teaching provision' in the proposals on assessment of evidence and also in Annex F on further guidance.

Question 12. To what extent do you agree with our proposal for published information? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.

[Note: They propose to publish the following on the OfS register: A provider's overall rating, the aspects rating and the date the awards were made OR that a provider 'requires improvement' OR that the provider's TEF rating has been suspended by the OfS due to a breach of minimum requirements.]

- **Tend to agree**

The proposals for published information seem sensible and appropriate in the interests of transparency.

Question 13. To what extent do you agree with our proposal for the communication of ratings by providers? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.

[Note: This covers how the ratings and logos may be used, how communications about the duration of awards should be shared, and restrictions on publishing the aspect ratings or panel statements without the provider rating.]

- **Tend to agree**

We agree that the ratings and results of a TEF assessment should be published broadly and accessibly if it is to be of any benefit to providers or prospective students, as well as in the interests of transparency. Likewise, we agree that it is sensible for providers to publish according to a set of guidelines to maintain consistency across the sector.

We also agree that it could be potentially misleading for a provider to publish an aspect-level rating without also publishing their provider-level rating. By the same token, however, we would argue that providers should publish both aspect and provider-level ratings where these have been given, rather than the suggestion in c) of paragraph 230, that it would be acceptable to publish a provider-level rating without an aspect rating. If the TEF aims to provide information about teaching quality to potential students then, in the interests of transparency and fairness, all ratings should be published.

As noted above in our response on the ratings scheme, we would reiterate that we do not believe the proposed ratings scheme and ratings descriptions provide enough in the way of helpful

¹⁵ The British Academy (2019), *Response to the Independent Review of the Teaching Excellence and Student Outcomes Framework (TEF)*.

information for prospective students or other interested parties. While more detailed information would be available elsewhere, as set out in proposal 12, it might be beneficial for providers to publish links for accessing this further information on their webpages, alongside information about their TEF rating. Provider webpages are likely to be the first port of call for prospective students and this would help them to navigate to the further information on pages with which they are less likely to be familiar.

Question 14. To what extent do you agree with our proposal for the name of the scheme? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your answer.

[Note: the proposal is to revert to 'Teaching Excellence Framework' from the 'Teaching Excellence and Student Outcomes Framework'.]

- **Strongly agree**

We agree with the proposal to return to the name 'Teaching Excellence Framework'. As we have previously noted in our response to the Independent Review of the TEF in 2019, the Academy believes that enhancing teaching provision should be the primary purpose of the TEF.¹⁶ This is also the area where we believe that the TEF has the most potential for positive impact and to support and enhance teaching in higher education providers in a way which reflects the core missions of those providers.

Returning to the shorter, more specific name for the framework will also help to tie it in more clearly with the related REF and KEF frameworks. We also agree that 'TEF' also has more name recognition across the sector, as noted in paragraph 233 of the consultation.

We support the removal of 'and Student Outcomes' from the name of the framework. However, as cited elsewhere in our response to this consultation, we believe that a continued focus on assessing student outcomes within the TEF dilutes the value and focus of the framework; particularly as the proposed specifications for student outcomes and progression in particular, as set out in this consultation and the accompanying consultations, ignores the many additional benefits and aspects of value that graduates can bring to society and which do not fit within the proposed definitions of 'managerial or professional employment'. We also feel that it would be misleading to continue assessing student outcomes while removing the name from the framework, as this change would not be reflected in the content of the assessment.

Question 15. To what extent do you agree with our proposal for the timing of the next exercise? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your answer.

[Note: the proposal is to move TEF to a four-year cycle, with the next iteration beginning with the appointment of a TEF panel in August 2022, and the window for provider and student submissions opening in early Sept. 2022. The submissions window would close in November 2022, with assessments carried out between late November and March 2023. Providers would be notified of provisional decisions in April-May 2023 and outcomes published for providers in May 2023.]

- **Tend to agree**

Given the time which has passed since the last TEF exercise and the present extension to existing TEF awards, we agree that it would be beneficial for providers and the sector to implement a new

¹⁶ The British Academy (2019), *Response to the Independent Review of the Teaching Excellence and Student Outcomes Framework (TEF)*.

exercise before the end of 2022. The timeline suggested in Table 2 of Proposal 15 seems reasonable to achieve this.

We agree with the recognition of the impacts of the COVID-19 pandemic as set out in proposal 15 and that these should be considered in provider submissions. We suggest that this recognition is extended to student submissions and, as noted above in our response to the question on indicators, should also be included when assessing indicators as the data covers the period of the last four years.

The British Academy was asked by the Government Office for Science to produce an independent evidence review of the long-term societal impacts of COVID-19 and in our reports, we outlined the ways in which the pandemic has, and will continue to have, social, economic, and cultural impacts.¹⁷ Chapter 4 of the evidence review focuses on the impacts of COVID-19 on knowledge, employment and skills in the UK and it may of particular interest in relation to this consultation. In particular, the report found that student experiences of higher education and perceptions of teaching quality were impacted by the pandemic, as were their expectations for post-graduation.¹⁸ These impacts will continue to be felt for some time, including on the graduate labour market, and the full extent of these impacts cannot yet be known, nor will they be felt the same across all providers. We consider that it will therefore be important for future cycles of the TEF to also be prepared to take the impact of the pandemic, which may be compounded by other more recent crises, into account in a similar fashion as part of the assessment process.

¹⁷ The British Academy (2021), *The COVID Decade: Understanding the long-term societal impacts of COVID-19*.

¹⁸ The British Academy (2021), *The COVID Decade: Understanding the long-term societal impacts of COVID-19*.