

British Academy response to the Office for Students' consultation on the future approach to quality regulation

11 December 2026

Background

The following is the British Academy's response to the Office for Students (OfS)' consultation on a future approach to quality regulation. The OfS is proposing to change the way it regulates and assesses the quality of higher education in the regulated English higher education sector. This consultation sets out proposals for the aims and approach of the OfS' future quality system, including modifications to the overall quality system and to the Teaching Excellence Framework (TEF).

The Academy has responded to proposals on which it is best equipped to provide insights and which most impact the health of the SHAPE disciplines and of English higher education as a whole.

The Academy has responded to several previous consultations on matters related to the OfS. This includes consultation on the [OfS' strategy 2025-30](#), [regulating student outcomes](#), various aspects of the [Teaching Excellence Framework \(TEF\)](#) and on [constructing student outcome and experience indicators](#). All previous consultation responses are available on the Academy's website.

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Section 1: Overall quality system

Proposal 1: A more integrated overall system

1a. What are your views on the proposed approach to making the system more integrated?

The British Academy believes in the importance of a clear and well-integrated quality regulation system for English higher education. Such a system is essential to ensure consistent standards across diverse providers, safeguard public trust in the system, and balance accountability with institutional autonomy. We are concerned, however, that the proposals in this consultation risk transforming the TEF from an exercise designed to incentivise excellence in teaching and education into a blunt instrument of regulatory compliance.

The TEF should assess the quality of teaching and learning delivered at providers. When working well, the TEF serves to spotlight and champion teaching excellence and to incentivise and enable improvement where necessary. We share the concerns expressed by the previous TEF chair and deputy chair that the proposed more ‘integrated’ system blurs the lines between regulatory conditions of registration and TEF assessments. This undermines progress towards establishing the TEF as a mechanism to explore, improve and celebrate teaching and learning in the student interest.¹

We are particularly concerned by proposals to integrate B conditions of registration with TEF assessment, reduce the material assessed and to alter the ratings system in ways that raise the overall stakes of TEF performance. Taken together, these changes risk diminishing confidence in the TEF as an accurate reflection of teaching quality.

Plans to ‘fully integrate’ condition B3 into the TEF, while only partially integrating other B conditions – set out in this consultation and elaborated in Proposal 6 – are especially problematic. We recognise that overlap between conditions of registration and TEF assessments has already created confusion for providers assessed at different points on competing metrics of similar criteria. Embedding compliance with condition B3 into TEF would further compromise the role of TEF ratings as a genuine reflection of the teaching and learning that students experience. It also risks implying an inevitable and comprehensive correlation between teaching quality and graduate outcomes such as salary and employment, despite limited evidence.

As the Academy has consistently argued, the use of student outcomes to inform TEF ratings risks conflating teaching quality with factors largely beyond providers’ control.² Employment destinations and salaries shortly after graduation reflect student characteristics such as socio-economic background, regional labour markets, and macroeconomic conditions, rather than the quality of teaching.³ Over-emphasis on links between teaching quality and graduate outcomes risks misleading both prospective and enrolled learners and negatively impacting

¹ Sir Chris Husbands and Janice Kay (2025), [‘From improvement to compliance – a significant shift in the purpose of the TEF.’](#) *Wonkhe*.

² The British Academy (2022), [‘Response to the Office for Students’ consultation on the Teaching Excellence Framework \(TEF\).’](#) pp. 2-4; The British Academy (2022), [‘Response to the Office for Students’ consultation on a New Approach to Regulating Student Outcomes.’](#) p. 3; The British Academy (2019), [‘Response to the Independent Review of the Teaching Excellence and Student Outcomes Framework.’](#) pp. 2, 4-5.

³ Universities UK (2022), [‘Graduate employment: its limits in measuring the value of higher education’](#), p. 5; The British Academy (2025), [‘Measuring SHAPE Graduate Outcomes: Policy Briefing’](#).

impact providers, who will be judged on metrics largely beyond the control of those delivering teaching and learning.

At a minimum, student outcomes should carry much less weight in TEF assessments than other measures. If included, they should be thoroughly contextualised and understood with necessary nuance. In addition, it is unlikely that prospective students will benefit from the availability of student outcomes measures, given the contingency and complexity of this information. As we discuss in our response to Proposals 6 and 7, the removal of the progression indicator from condition B3 does not go far enough to justify TEF ratings determined largely by flawed student outcomes metrics. Integrating condition B3 with TEF assessments, as proposed, risks conflating teaching quality with outcomes in ways that risk misleading learners and undermining confidence in the system. TEF assessments should prioritise evidence of excellent pedagogical practice and innovative curriculum design, not metrics like salary and employment data that are largely beyond the control of those delivering programmes of study.

Recent policy developments heighten these concerns. The Post-16 Education and Skills White Paper proposes using TEF ratings to ‘make future fee uplifts conditional on higher education providers achieving a higher quality threshold through the OfS’ quality regime’.⁴ Paragraph 74 of this consultation document also suggests overall TEF ratings should be tied to fee levels as currently determined by the Department for Education (DfE).

Linking TEF performance to tuition fee levels, particularly at a time of increased financial pressure on the sector, raises the stakes considerably. In this context, it is vital that TEF ratings are accurate reflections of the teaching and learning students can expect from a given provider. We believe the proposed ‘integrated’ system will not deliver more accurate assessments, but risks exposing providers to investigation, intervention and financial penalties because of a TEF rating that does not accurately reflect the teaching quality. Moreover, tying fees to a rating in part determined by graduate outcomes risks creating incentives for providers to shift recruitment aims towards cohorts and subjects most likely to yield high performance in student outcomes measures, including earnings. This would run counter to the OfS’ aims of providing students with clear information and confidence in the quality of education they receive. We therefore urge the OfS to reconsider this proposal and to engage substantively with methodological concerns about the use of graduate outcomes in its regulatory approach.

1b. Do you have views on opportunities to reduce duplication of effort between the future Teaching Excellence Framework (TEF) and access and participation plans?

While we recognise the burden on providers inherent in both participation in the TEF and the publication of access and participation plans (APPs), we believe the TEF and APPs should remain compatible but distinct endeavours.

The TEF and APPs serve distinct purposes. The TEF provides an evaluative assessment to enable excellence in teaching and learning; APPs set institutional commitments to widening access and improving participation, ensuring that higher education is accessible for all regardless of background and that students from all backgrounds can meaningfully

⁴ HM Government (2025), ‘[Post-16 Education and Skills](#)’, p. 52.

participate and benefit. Teaching and learning have a strong bearing on students' participation and equality of opportunity. Yet there are many other barriers to access and participation, from application stage through to other much broader aspects of the student experience. APPs have been a positive addition to the sector, recognising the many barriers to meaningful access and participation and requiring providers to take a multi-pronged approach. Refocusing APPs exclusively on access, and moving efforts to improve equality of opportunity in participation exclusively into the TEF in the name of streamlining regulation, would risk losing sight of a major segment of factors that support students from widening participation backgrounds. This would also impede APPs' momentum as a positive new addition to sector oversight – with providers already investing considerable effort in developing their respective plans – while creating unnecessary policy churn and undermining APPs' distinct purpose.

It is also important to keep the TEF and APPs distinct given the risk of conflict of interest between TEF assessments and providers' efforts to promote access and participation. TEF ratings are partly informed by student outcomes which – as noted in our response to Proposal 1(a) – often correlate with student demographics, including socioeconomic background. Given proposals in this consultation to increase penalties for providers who receive lower TEF ratings, providers have greater incentive than ever to recruit students from more advantaged backgrounds who are more likely to ultimately have higher student outcomes to achieve higher TEF ratings. Keeping APPs and TEF assessments separate is important to ensure providers continue to prioritise access and participation in this changed environment.

We also recommend avoiding the distinction made in Paragraph 38 of the consultation document that frames APPs as 'forward facing' activities in a way that suggests the TEF is not also forward facing. The TEF is inherently a 'forward facing' exercise, designed to enhance and improve the quality of teaching and learning in the student interest. Both the TEF and APPs should be understood as part of a wider portfolio of sector monitoring overseen by the OfS that is 'forward facing', ambitious in its vision, and in pursuit of excellence in higher education for all.

Section 2: The future TEF

Proposal 2: Providers in scope

2a. What are your views on the proposal to assess all registered providers?

We agree with the principle of assessing all registered providers under the TEF. This brings alignment across the sector and provides an opportunity to recognise innovative pedagogy and distinctive learning experiences delivered by providers of all shapes and sizes.

However, we are concerned that the current model may place disproportionate demands on small and specialist institutions, many of which play a vital role in delivering provision in the SHAPE disciplines. Many small providers have described participation in TEF as burdensome and costly.⁵ OfS analysis of TEF 2023 found the average cost of submission to be £20,600 for colleges and £49,700 for HEIs.⁶ The proposed new TEF assessment fee set out in Proposal 17 may add an additional £25,000 or more per provider, through staffing

⁵ FE Week (2025), '[OfS to end TEF opt-out for colleges and small providers.](#)'

⁶ Office for Students (February 2025), '[Estimates of the costs of the Teaching Excellence Framework 2023.](#)' p. 3.

and resource costs. This would make participation in the TEF even more expensive than in previous iterations, at a time when providers are already facing significant financial pressures.

We therefore seek greater clarity on how small and specialist providers, many of whom already find the cost of OfS registration burdensome, will be supported to participate in the TEF without excessive financial strain.⁷ More broadly, we encourage consideration of proportionate models of assessment that reflect the diversity of provider size and mission. Such measures would help ensure that the TEF remains inclusive and reflective of the full breadth of UK higher education.

2b. Do you have any suggestions on how we could help enable smaller providers, including those that haven't taken part in the Teaching Excellence Framework (TEF) before, to participate effectively?

In addition to clarifying the financial burden of TEF participation, as set out in our response to Proposal 2a, we are concerned that smaller providers – particularly those that have not previously participated in the TEF – may face a knowledge and experience gap when engaging with a national exercise of this scale.

While the OfS already produces a substantial body of written guidance and offers periodic webinars, there remain opportunities to strengthen support so that participation is equitable across a diverse sector. This could include proportionate and differentiated guidance to ensure readiness, enhanced opportunities for pre-submission engagement, and examples of good practice drawn from a range of provider contexts – including specialist institutions, providers with predominantly mature or part-time learners, and those offering modular provision. Smaller providers may also be concerned with how contextual factors such as cohort size, provision type, or local student demographics will be understood by TEF panels. Clearer articulation of how these factors will be considered would build confidence in the process and assist providers in preparing proportionate submissions. Collectively, such adjustments could help ensure the TEF remains accessible to the full breadth of the sector while preserving its integrity and comparability.

In this context, it will be important for the OfS to ensure that providers subject to more frequent assessment can engage with the TEF in a proportionate way. Clearer guidance and transparent expectations for evidential submission would help ensure that increased regulatory intensity associated with a Bronze rating does not inadvertently draw capacity away from improvement activity. Such measures would support coherence within the framework while maintaining the distinct purpose and rigour of the TEF.

Proposal 3: Provision in scope

3a. Do you have any comments on what provision should be in scope for the first cycle? You could include comments on areas such as:

- **the inclusion of apprenticeships**
- **the proposal to look separately at partnership provision.**

⁷ Sir David Behan (2024), [Independent Review of the Office for Students \(Fit for the Future: Higher Education Regulation towards 2035\)](#), pp. 21-22.

The Academy agrees that the first cycle of the new TEF should focus solely on the quality of undergraduate provision, aligning with the scope of the 2023 TEF. Expanding the provision in scope should be gradual, aligned with the shift to a cyclical TEF. Widening coverage immediately, alongside other significant changes such as assessing all registered providers, risks creating unnecessary complexity and confusion, potentially leading to errors in submission or assessment. A staged approach is therefore most appropriate.

On apprenticeships, we agree that the UK's post-18 qualification offer should be more joined-up and better integrated, and that learners should view apprenticeships as one of several worthwhile pathways – academic, vocational, technical, or mixed routes.⁸ Bringing apprenticeships fully within the scope of the TEF would give learners access to comparable assessments of apprenticeship and degree provision. We note that apprenticeships can already be optionally included in providers' TEF submissions, with indicators reported separately, but it is unclear how many providers currently submit such data. Further consultation with providers offering extensive apprenticeship provision should be carried out before compulsory inclusion is introduced.

We also recognise the risk of double regulation given Ofsted's responsibilities in this area. For aspects not already covered by Ofsted – namely student outcomes and assessment – it is not clear that assessing all apprenticeship provision alongside undergraduate provision would deliver sufficient benefits. Apprenticeships, often designed as training for specific occupations, may be poorly suited to assessment against TEF's student outcomes framework, particularly post-study destinations. This is because these destinations will not all be roles classified as 'managerial or professional employment', one of the proposed post-study measures to be used in student outcomes assessments. Apprenticeships also typically see lower completion rates than undergraduate degrees and care should be exercised when reporting completion rates in this context.⁹

Although operating in a different regulatory context, we note that Medr, the Welsh tertiary regulator, is developing its approach to apprenticeships alongside other post-18 provision, in areas also regulated by Estyn, the education and training inspectorate for Wales.¹⁰ This may offer opportunities for cross-nation learning on reducing regulatory duplication.

On presenting data separately for teaching delivered through sub-contractual arrangements, we believe learners deserve high-quality learning and clear information about what to expect.¹¹ This may differ between lead and delivery partners. Presenting data separately is proportionate and sensible and differentiating indicators data by each named partnership rather than simply distinguishing between lead and partnership provision also seems appropriate.

On modular provision, we strongly agree that specific measures must be developed before assessing outcomes for students taking modular courses. Current outcomes indicators on continuation and completion were designed for linear, full-time programmes and may not reflect the realities of modular pathways. Current B3 data shows that part-time and mature learners typically exhibit more varied patterns of completion and continuation, even where

⁸ The British Academy (2025), [A Joined-Up Approach to Skills Policy](#), p.10.

⁹ Department for Education (2025), [Apprenticeships: Academic year 2024/25](#). Release date 28 November 2025 [accessed 9 December 2025].

¹⁰ Medr (2025), [Consultation on a new regulatory system including conditions of registration and funding](#), p. 6, 12.

¹¹ Universities UK (2025) '[Our response to the Department for Education's \(DfE\) consultation 'Strengthening oversight of partnership delivery in higher education'](#)'.

provision is of high quality.¹² Under current definitions, pauses in study or completion of a small number of credit-bearing modules may register as non-continuation, despite being consistent with the aims of modular provision.

Applying traditional continuation and completion measures as minimum thresholds could produce misleading signals about quality and create disincentives for institutions to expand flexible pathways, particularly where learner trajectories differ legitimately from those of full-time cohorts. Adapted or alternative indicators will be required to ensure regulation of minimum student outcomes aligns with policy direction toward increased modular study. Metrics must accurately reflect expected study behaviours within a reformed system to maintain confidence in the regulatory framework and avoid conflating flexible learner choices with concerns about quality.

Finally, as a general principle, we caution against any expansion in scope that detracts from the TEF's core purpose of measuring and enhancing teaching quality. The proposal to examine governance arrangements in future TEF cycles risks extending the framework beyond its intended scope and diluting its central focus. While we welcome dialogue between the OfS and the sector on governance best practice, embedding this within TEF assessments would reduce clarity of purpose in unhelpful ways. We would note similar concerns have been raised in other areas of the sector, for example, on the expansion of scope in the REF. We recommend the OfS preserves the integrity and effectiveness of regulatory instruments by focusing only on direct relevant functions, in this case ensuring that only measures that directly relate to teaching and learning are included in TEF assessments.

We look forward to engaging further in future consultations on new approaches to postgraduate, apprenticeship and modular provision ahead of the second cycle of TEF assessments.

3b. Do you have any comments on the proposed approach to expanding assessments to include taught postgraduate provision in future cycles?

In principle the Academy welcomes the inclusion of taught postgraduate (PGT) provision in future TEF cycles. Both undergraduate and PGT students deserve a high-quality learning experience, and staff delivering innovative pedagogy should be recognised for their contributions to effective teaching and learning at all levels of study. The sector already offers a wealth of excellent taught postgraduate provision, with the latest AdvanceHE Postgraduate Taught Survey reporting the highest student satisfaction levels since 2014.¹³ Including PGT provision in future TEF iterations would strengthen student confidence in both the TEF as an exercise and in the OfS as a voice for the student interest across all levels of study.

Nevertheless, careful consideration will be required. At a minimum, the OfS should clarify how its separate undergraduate and PGT ratings will be communicated to prospective applicants, given the risk of confusion created by multiple ratings for different parts of the same institution. It will also be important to explain how integrated masters programmes – combining undergraduate and postgraduate study – will be assessed.

Any TEF cycle that includes postgraduate provision should reflect the significant differences between PGT and other provision, requiring a differentiated approach to assessment. These

¹² Office for Students, [Risks by student characteristics](#), Equality of Opportunity Risk Register. [accessed 27 November 2025]

¹³ Advance HE (2025), [‘Postgraduate taught student satisfaction reaches highest level since survey began’](#).

differences include, but are not limited to, student demographics, learner motivation for enrolment, and course aims, assessment, and structure. For example, nearly half (47%) of PGT students are international, and research shows that expectations of teaching, support, and post-study destinations vary considerably by country of origin.¹⁴ Such diversity must inform the design of surveys and other metrics used to assess learner experience.

PGT provision is also closely interwoven with research activity, with programmes delivered by staff who often have research responsibilities. Completion of a PGT programme is frequently a stepping stone to post-graduate research (PGR). Any assessment of PGT teaching and learning must therefore recognise this interdependence and explicitly champion teaching informed by cutting-edge research. Providers should also be able to contextualise in their submissions how broader changes in the research environment, including potential reforms to funding structures set out in the Post-16 Education and Skills White Paper – have affected PGT teaching and learning as this will vary by institution type.

We also note that measures of student outcomes, while problematic across all provision types, may be particularly unsuited to postgraduate study. Motivations for PGT participation vary widely and extend beyond salary or employment destinations, encompassing career development, progression into a research career, and intellectual curiosity.¹⁵ The Academy has consistently highlighted the risks of using salary and employment measures soon after graduation as proxies for programme quality. Many SHAPE postgraduate pathways lead to careers in research, culture, education, and public service – roles that deliver significant societal value but are not always associated with high earnings.¹⁶ Any measure of positive outcomes from PGT programmes must reflect this complexity.

Overall, we remain supportive of including PGT provision in principle. We look forward to working with the OfS to address these complexities in further consultation as plans develop.

Proposal 4: Assessment aspects and ratings

4a. What are your views on the proposal to assess and rate student experience and student outcomes?

The Academy has several concerns about the proposal to assess and rate student experience and outcomes. Detailed responses to the criteria for each aspect rating are provided in subsequent sections.

Overall, we note that plans to assess providers on recent activity for student experience, and on more retrospective measures for student outcomes, are largely driven by the slower availability of outcomes data rather than deliberate design. The resulting time lag – meaning different cohorts are assessed under one TEF cycle for different aspects – risks misleading learners by implying a causal relationship between the quality of students' recent experience and the graduate salary and employment outcomes of previous cohorts.

The decision not to assess how effectively providers drive quality improvement may be a missed opportunity. Promoting improvement in teaching quality should be a core aim of the

¹⁴ Data from Higher Education Statistics Agency (HESA) [Student Record 2023/24](#) (HE student enrolments by permanent address) © Jisc 2025.

¹⁵ E. Anna Claydon and Colin G. Johnson (2025), [Understanding Student Motivations and Concerns in Entering Postgraduate Study: Initial Findings from an International Investigation](#); Institute for Employment Studies and NatCen Social Research (2018), [Developing a Survey of PGT Students](#). Office for Students. pp. 4, 35-37.

¹⁶ The British Academy (2025), [‘Understanding SHAPE Graduates.’](#)

TEF. Encouraging providers to submit evidence of their efforts in this area would incentivise improvement transparently. Relying instead on strengthened incentives and interventions (which we have considered in our response to Proposal 13, below) risks shifting the TEF towards regulatory compliance rather than its intended focus on teaching quality. Enabling providers to showcase their efforts to improve quality is precisely the activity the TEF should support, and we would welcome a reconsideration of this decision.

4b. Do you have any comments on our proposed approach to generating ‘overall’ provider ratings based on the two aspect ratings?

We strongly disagree with the proposal to generate ‘overall’ provider ratings based on the lowest awarded of the two aspect ratings (student experience and student outcomes). While we recognise the desire for consistency and reduced burden, this approach would conflate two distinct metrics without clear evidence of direct correlation.

In previous TEF exercises, overall ratings reflected both student experience and outcomes, allowing assessors to take a holistic view of each provider. This gave scope to consider how far each set of indicators should inform TEF ratings on a case-by-case basis. Under the proposed system, a lower aspect rating for one measure could downgrade a provider’s overall rating even where there is clear evidence of strengths in the other.

We also note that the consultation suggests it would be ‘helpful for overall ratings... to link to fee levels as currently determined by the Department for Education’ (Paragraph 74). This implies that providers rated Bronze or below, on account of their lowest aspect rating, could face financial consequences. If TEF ratings are to influence tuition fee levels, it is essential that they accurately reflect the teaching and learning students can expect, rather than being skewed by outcomes measures that may not directly reflect teaching quality.

In this context, we believe using the lower of two aspect ratings to determine overall scores risks producing ratings that misrepresent teaching quality and carry steep financial consequences that may create and perpetuate a cycle of low improvement. We therefore recommend publishing two separate ratings – one for student experience and one for student outcomes – without an overall rating. At a minimum, we urge reconsideration of the proposed approach in favour of retaining assessor adjudication to balance the relationship between student experience and outcomes where ratings differ.

Proposal 5: The student experience aspect

5a. What are your views on the proposed scope of the student experience aspect, and how it aligns with the relevant B conditions of registration?

The Academy agrees that the scope of the student experience aspect in previous TEF cycles worked well and should be retained. We have consistently supported using ‘student experience’ as the framework for assessing teaching quality in the TEF. The proposed scope – covering teaching, assessment and feedback, academic support, learning resources, student voice, and learning opportunities – appears appropriate.

However, as noted in our response to Proposal 4, aligning the scope and ratings criteria more closely with conditions B1, B2 and B4, risks reducing the TEF to a compliance tool and blunting its role as a teaching enhancement exercise. Given OfS’ acknowledgement that the previous approach to assessing student experience was effective, this change does not provide sufficient clear tangible benefits to providers or students.

5b. What are your views on our initial thoughts on the criteria for the student experience rating (at Annex H)? You could include comments on:

- **whether the ‘course content and delivery’ criteria suggested in Annex H should be framed differently for a provider-level assessment**
- **whether there is clear enough differentiation between each level, and how this could be improved**

The Academy has significant concerns about the proposed criteria for the student experience rating, as set out in Annex H.

First, the ‘course content and delivery’ criteria may struggle to capture the diversity of provision at provider-level. These criteria, aligned with condition B1 on Academic Experience, were designed for course-level regulatory compliance rather than assessing provider-level teaching quality. Attempting to scale course-level concepts to provider-level judgments risks methodological mismatch. To preserve the TEF’s role as an enhancement exercise, clearer guidance is needed on how course-level evidence should aggregate meaningfully, without disadvantaging providers offering diverse or innovative provision.

Second, the draft criteria lack clear differentiation between rating levels. Too much weight is placed on TEF assessors’ subjective interpretation of ill-defined distinctions. For example, differentiating between courses informed by ‘recent’ research (Silver) and ‘the latest’ research (Gold) is unlikely to be applied consistently, particularly by non-subject experts. Similarly, distinctions between courses ‘enhanced’ versus ‘enriched’ by recent subject, research, industry, or professional developments, are too subtle to support reliable judgements. This lack of clarity is especially concerning given that providers rated Silver will no longer be able to make representations, as detailed in Proposal 8.

In addition, the downgrading of Bronze to represent only the minimum required quality is problematic. This creates too high a bar for providers delivering good quality provision but not yet at Silver level. In addition, there is a risk of confusion, as Bronze is unlikely to be automatically understood as a failing grade, further undermining transparency. We recommend restoring Bronze to a level above the minimum requirements. In general, the draft ratings criteria should be revised to provide clearer differentiation between ratings, with key terms defined in measurable ways that can be consistently and clearly evidenced by assessors.

Finally, the draft criteria as presented in Annex H do not acknowledge the many ways that generative AI will transform – and is already transforming – many aspects of teaching and learning, including assessment. Any criteria for rating student experience in future TEF assessments should be open to reasonable adaption.

5c. What are your views on the evidence that would inform judgements about this aspect? You could include comments on issues such as:

- **what evidence could demonstrate the requirements of condition B1 are met at a provider level**
- **whether the submission page limit should be reduced**
- **the proposed inclusion of indicators based on the ‘Learning opportunities’ theme of the NSS.**

The Academy recognises the complexity of attempting to measure and assess teaching through quantitative metrics without an agreed cross-sector and cross-disciplinary definition of teaching excellence. This challenge is heightened by plans to expand the TEF to all providers, which will increase the diversity of provision being assessed and make capturing and comparing the full spectrum of approaches to teaching more difficult. We therefore believe qualitative evidence through provider submissions should continue to play a significant role in assessing student experience, as this allows a more rounded and nuanced understanding of high-quality teaching and learning across a variety of providers.

As noted in previous TEF consultation responses,¹⁷ the Academy remains sceptical of over-reliance on the National Student Survey (NSS) as a measure of teaching and learning quality. Conducted at a single point at the end of study, the NSS provides only a partial view of teaching quality delivered across multi-year programmes. Furthermore, graduates may come to reassess their student experience after entering employment and applying the skills gained during their degree. In addition, response rates vary significantly between providers, often reflecting differences in marketing around NSS participation. The OfS has acknowledged risks of inappropriate influence on respondents, but enforcement is difficult given the scale of a nationwide survey.¹⁸

The most substantive critique of NSS data is its limited validity as a proxy for teaching quality. As the Independent Review of the TEF noted in 2021, the NSS measures student satisfaction rather than teaching quality. While related, these are not interchangeable, and reliance on satisfaction data raises concerns about the robustness of TEF judgements.¹⁹ This issue risks being compounded in future cycles of the TEF, with the introduction of assessments of modular, flexible provision, where response rates and student expectations vary further.

In this context, we caution against reducing the provider submission page limit to fewer than 25 pages. While we understand the desire to reduce burden on providers and TEF assessors, limiting submission length would reduce opportunities for providers to contextualise NSS data. Instead, we recommend giving greater weight to qualitative evidence from both providers and students, rather than increasing the salience of the NSS metrics by proxy.

We acknowledge that the ‘Learning opportunities’ theme of the NSS contains questions relevant to TEF student experience assessments, such as students’ exploration of ideas and concepts in depth. However, this data should be supplemented with enhanced student submissions, to ensure substantive reflection on student experience informs judgements. If TEF is to be aligned with B conditions, then evidence of meeting condition B1 on Academic Experience is arguably best drawn from student submissions rather than NSS data alone.

We would encourage further exploration of alternative student submissions, particularly for smaller providers, where focus groups or surveys may be impractical. We look forward to engaging with the OfS as these proposals develop.

¹⁷ The British Academy (2019), [Response to the Independent Review of the Teaching Excellence and Student Outcomes Framework \(TEF\)](#), p. 4.

¹⁸ Office for Students (2025), [‘National Student Survey 2026: Procedures for investigating allegations of inappropriate influence on survey results’](#).

¹⁹ Department for Education (2019), [Independent Review of the Teaching Excellence and Student Outcomes Framework](#), p. 34.

Proposal 6: A revised and integrated condition B3

6. Do you have any comments on our proposed approach to revising condition B3 and integrating the assessment of minimum required student outcomes into the future Teaching Excellence Framework (TEF)? You could include comments on areas such as:

- **removing the progression indicator from condition B3**
- **how contextual factors would be considered at different stages in the process.**

The Academy welcomes the removal of the progression indicator from condition B3 in response to stakeholder feedback, given many degrees set graduates on pathways that do not lead immediately to roles classified by the ONS as ‘professional or managerial employment’ yet remain worthwhile and ultimately beneficial to those who study them. However, we remain concerned about proposals to continue using progression indicators based on Graduate Outcomes data in TEF student outcomes post-study measures.

Proposal 7: The student outcomes aspect

7a. What are your views on the proposed approach and initial ratings criteria for the student outcomes aspect?

The Academy has significant concerns about the proposed approach and initial ratings criteria for the student outcomes aspect. These include:

- the continued use of graduate employment and introduction of salary metrics as criteria for assessing teaching quality;
- the reclassification of Bronze ratings as meeting a benchmarked minimum standard rather than exceeding it;
- the removal of educational gain as a recognised measure of student outcomes.

First, the proposed criteria fail to address longstanding concerns about a narrow definition of positive student outcomes. While we welcome the removal of the progression indicator from condition B3, as outlined in our response to Proposal 6, we are disappointed that graduate employment remains central to TEF outcomes measures and we are especially concerned at proposals to include graduate salaries in the TEF’s student outcomes assessments for the first time. These metrics lack a clear relationship to the teaching and learning students experience during their programme of study. Moreover, the proposed criteria are blunt tools that will likely require providers to submit extensive contextual information. While contextual information is clearly important, this does somewhat undermine claims that this proposal will streamline processes or reduce burden. Providing this information will require resources that could be better spent on drafting qualitative statements exploring, for example, learning gain, which we were disappointed to see will not be encouraged in future TEF submissions.

Second, and as we have noted in our response to Proposal 4, we are concerned that the criteria for Bronze ratings risk confusion both for prospective students and for providers. Under the proposed system, Bronze outcomes are described as ‘sufficient quality’ yet ‘below what would be expected’. This reclassification of Bronze from exceeding minimum requirements to merely meeting them, risks misleading students and weakening the TEF’s

role as a driver of improvement. Instead of incentivising excellence, the Bronze rating risks becoming a marker of compliance with a low baseline standard.

The inclusion of educational gain in the 2023 TEF, following the Independent Review in 2021, was a positive step forward for the sector. Providers were encouraged to explicitly evidence both the intended learning gain and the extent to which these were achieved, sending a clear signal that innovative and ambitious teaching practice was valued and clearly in the student interest. Providers invested considerable effort in developing bespoke measures, and while further work was needed to articulate a cross-sector and cross-discipline definition of educational gain, momentum was building in a constructive direction.

Moreover, encouraging evidence of educational gain alongside student outcomes sent a powerful message that participation in higher education should be about further developing skills and knowledge from each student's individual baseline, not strictly about salary or employment destinations. This was an important counterweight to the narrow focus on post-study employment outcomes, which has consistently failed to capture students' expectations or the broader societal value of higher education. Given TEF ratings are partly informed by student outcomes data, encouraging providers to supply evidence of educational gain meant providers could show different kinds of success for learners, such as the development of key skills and knowledge, or evidence of significant improvement even in the event of varying learner baselines. This was important given how student outcomes often correlate with socioeconomic background, as noted in our response to Proposal 1(a). Providers were encouraged to show how disadvantaged learners meaningfully benefited from participation in higher education, even if participation did not lead automatically to entry into professional or managerial employment immediately after graduation. Under this proposal, providers now have far less incentive to monitor and evaluate evidence of educational gain for these learners, and risks deprioritising the needs and ambitions of disadvantaged learners. This is a real loss for the sector.

We are highly disappointed that measures of educational gain will no longer be encouraged in provider submissions. Excluding educational gain from future TEF assessments clearly runs counter to the TEF's express purpose of incentivising and celebrating high-quality teaching and learning. The Academy strongly believes educational gain should continue to form part of provider submissions, ensuring this vital aspect of higher education continues to be recognised and celebrated.

7b. Do you have any comments on the proposed set of employment and further study indicators, and are there other measures that we should consider using?

The Academy welcomes aspects of the proposed set of employment and further study indicators. We welcome the inclusion of Graduate Outcomes survey responses on how far students are using what they learned in their degree. Our research has shown that skills derived from SHAPE subjects – including critical thinking, analytical skills, creativity and communication – are closely aligned with those most in demand by employers,²⁰ and highlighted by the National Foundation of Educational Research (NFER) as essential for the future workforce.²¹ Opportunities for graduates to reflect on the utility of their degrees will provide valuable evidence of how transferable skills contribute to the UK's skills base. We

²⁰ The British Academy (2025), *Measuring SHAPE Graduate Outcomes: Policy Briefing*; The British Academy (2020), *Qualified for the Future: quantifying demand for arts, humanities and social science skills*.

²¹ National Foundation for Educational Research (2025) '*Skills Imperative 2035*.'

also welcome the OfS' opposition to using 'negative outcomes', such as loan repayment levels and benefit claims, which are equally poor indicators of teaching quality, and would strongly oppose their introduction in future.

However, the Academy has significant concerns about some aspects of the proposed employment and further study indicators, for reasons of both data accuracy and the continued reliance on salary and employment data to assess teaching quality. While mindful of burden on providers and the OfS, we encourage further exploration of alternative metrics to contextualise student outcomes.

On the issue of data accuracy, the limitations of LEO data are well-known. LEO data does not distinguish between full-time and part-time work, meaning part-time workers are shown to have lower earnings without additional context. Its reliance on PAYE data also misrepresents graduates who are self-employed, which is particularly problematic for many graduates in the SHAPE disciplines, including those working freelance in the UK's world-leading creative industries.²² While we welcome the OfS' acknowledgment that the 15 months post-graduation Graduate Outcomes survey is too soon to provide a clear indicator of post-study outcomes, using salary data from three years after graduation is only a marginal improvement. It remains a brief snapshot of early working life rather than a reflection of long-term career development.

We are also disappointed to see the retention of the progression to professional or managerial employment indicator, despite the acknowledged technical flaws in Graduate Outcomes data. The Office for National Statistics (ONS) classification of professional or managerial employment is highly contested and can quickly become outdated as technological and labour market conditions evolve.²³ We acknowledge that OfS benchmarking of the proposed post-study indicators, which considers factors such as regional salary differences and student backgrounds, will mitigate some of the issues present in the data. However, concerns remain about the quality, reliability and representativeness of these measures, particularly as this consultation also proposes to reduce opportunities for providers to submit more detailed contextual evidence.

The Academy continues to caution against approaches that equate graduate success with salary. Such measures undervalue socially vital professions in key public services, including teaching and nursing, which require degrees but are less financially lucrative. Our research shows that in 2023, 77.7% in education, 64% of graduates working in public administration and defence, and 40.8% working in the health and social work sector, had studied SHAPE subjects.²⁴ These graduates make significant societal contributions that are not captured by salary data, reinforcing the point that salary outcomes do not equate to quality of teaching or the value of a degree. Earnings and employment outcomes reflect the shape of local, national and global economies. For example, in Australia, teaching is the seventh highest salary outcome (of 45 subject groups) for 2024,²⁵ in contrast to teachers' salaries in England.²⁶ Similarly, graduates entering the workforce during a period of recession, for example, may

²² GuildHE (2024), *The Value of Creative Graduates*, p.19,

²³ The British Academy (2025), *Measuring SHAPE Graduate Outcomes: Policy Briefing*.

²⁴ The British Academy (2025), *'Understanding SHAPE Graduates'*.

²⁵ Quality Indicators for Learning and Teaching (2024), *'Data Visualisation Graduate Outcome Survey'*.

²⁶ Institute for Fiscal Studies (2023) *'What has happened to teacher's pay in England?'*.

have poorer outcomes than those graduating into more favourable labour market conditions, even with the same degree, from the same institution.²⁷

We particularly support revisiting proposals highlighted in Paragraph 117, including indicators based on how far graduates find their course meaningful, how well it prepared them for future plans, and measures of wellbeing. The Higher Education Statistics Agency (HESA) is currently exploring improvements to the coverage of the Graduate Outcomes survey, including questions on wellbeing, job satisfaction and social mobility.²⁸ These non-financial measures could provide richer insights into how students view their programmes and post-study experiences.

We recognise that proving a direct causal relationship between reflections on wellbeing and teaching quality is challenging. Yet evidence of a causal link between teaching quality and post-study employment and salary outcomes is equally lacking, despite continued reliance on such data. We therefore encourage the OfS to pursue a holistic view of student outcomes, consistent with its commitment in Paragraph 123 to provide ‘important measures that matter to students’. These should not be limited to salary and employment but should include broad measures of success that reflect the full value of higher education.

7c. What are your views on the proposal to consider a limited set of contextual factors when reaching judgements about this aspect?

The Academy welcomes the OfS’ commitment to consider contextual factors when reaching judgements about this aspect. Given the limitations of LEO and Graduate Outcomes data, it is essential that wider contextual influences on student outcomes are taken into account when assessing providers’ submissions against the benchmarked indicators.

Many degrees set graduates on pathways that do not lead immediately to roles classified by the ONS as ‘professional or managerial employment’. We therefore welcome the proposal to provide guidance for TEF submissions on qualifications or occupations where progression to such employment within 15 months of graduation is atypical, or where the qualification is intentionally designed to lead to other forms of employment. This will be particularly important if apprenticeship provision is included in future TEF cycles, as noted in our response to Proposal 3. In compiling guidance, it will be vital that any list of qualifications or occupations accurately reflects the wide range of degree subjects and sectors where post-study salary and employment metrics fail to accurately represent success in particular jobs and sectors. This includes the creative industries – an Industrial Strategy priority sector – where relative salary and employment levels are well-known challenges and must be properly accounted for, especially for smaller, specialist providers specialising in arts degrees.²⁹

As discussed in our response to Proposal 3 on the assessment of modular provision, contextualisation will also be essential if flexible, single-module study is to be assessed within the TEF. Continuation and completion measures must be interpreted in light of the distinctive study behaviours associated with modular provision.

²⁷ The British Academy (2025), *Measuring SHAPE Graduate Outcomes: Policy Briefing*; The British Academy (2020) *Qualified for the Future: quantifying demand for arts, humanities and social science skills*.

²⁸ Tej Nathwani (2023), ‘*The value of a non-financial job quality measure in exploring graduate outcomes*.’

²⁹ GuildHE (2024), *The Value of Creative Graduates*, p.19.

We note Paragraph 121 states that ‘...additional contextual factors (that aren’t already accounted for by benchmarking) should also be taken into account...’. The Academy is concerned this implies providers will not be able to submit additional context on factors already included in benchmarking. Given the extensive issues with the data underpinning the proposed post-study measures, there will likely be cases where providers need to supply additional context beyond what is accounted for by benchmarking. Preventing this would risk undermining the accuracy and fairness of TEF judgements and their use in determining tuition fees.

Cited:

Proposal 8: Assessment and decision making

8a. What are your views on who should carry out the assessments? You could include suggestions for how we can enable more assessors (both academic and student) from small, specialist or college-based providers to take part.

No response.

8b. What are your views on only permitting representations on provisional rating decisions of Bronze or Requires improvement?

While we recognise that this proposal reflects a desire to balance thorough assessment with reducing regulatory burden, the Academy is concerned that treating a provisional Bronze TEF rating as effectively a ‘failing grade’ may weaken the esteem attached to Silver ratings. In a regime where TEF scores may determine which providers can charge higher tuition fees, raising the stakes of TEF ratings will heighten providers’ investment in their performance. In this context, it is reasonable that providers awarded a provisional Silver rating should have the option to make representations if they believe the assessors did not accurately consider all the evidence submitted.

We are particularly concerned given the fine-grained qualitative distinctions between Gold and Silver criteria in Annex H, as outlined in our response to Proposal 5. Providers provisionally rated Silver – especially where outcomes reflect subjective interpretation – should have recourse to challenge decisions. Moreover, while the proposal states all providers may make representations about the factual accuracy of their assessment reports, it then goes on to suggest that representations can only be made about ratings if they are provisionally Bronze or Requires improvement (Paragraph 137). This implies that in situations where a provider is awarded Silver based on incorrect information, the factual accuracy of the report will be corrected, but the rating itself cannot be changed. Greater clarity is needed to ensure all providers have a fair right of recourse in a new system of where TEF ratings carry higher stakes.

Proposal 9: Varying the approach for providers with limited data

9a. What are your views on our proposal for an alternative means of gathering students’ views to inform the student experience aspect where we do not have sufficient National Student Survey-based (NSS-based) indicators? You could include comments on:

- **the proposed approach to determining whether the NSS data is sufficient (this is expanded on in Annex G)**

- **the actions we are considering to improve the availability of NSS data for more providers**
- **how student views could be gathered through an alternative means.**

The Academy acknowledges that the proposed approach to determining whether NSS data is sufficient must balance the desire for comparable national data with the need for statistical confidence and reliability. We agree that sufficiency tests based on ‘Coverage’ and ‘Statistical confidence’ are appropriate, and that data should be examined across different types of provision rather than just a ‘majority mode’, where data is examined for just the majority provision type for each provider. However, requiring only three NSS-based indicators to meet sufficiency thresholds sets too low a bar. All NSS-based indicators were designed to be considered together, and using just three would provide insufficient coverage of the areas intended to be measured under the student experience aspect.

We support the development of alternative means to assess student experience where NSS data is insufficient. We welcome steps to reduce burden on smaller providers and to clarify requirements for submitting alternative evidence. It is important to strike the right balance between offering providers flexibility and ensuring smaller providers are not disadvantaged. Aligning alternative models with NSS indicators – for example, through focus groups or student-organised submissions – seems a sensible way to maintain consistency. However, processes for gathering such views should be designed in close dialogue with students themselves, to avoid excluding those with significant time pressures, such as students in employment, with caregiving responsibilities, or completing end-of-programme assessments.³⁰ Clear communication will also be needed to explain differences between student experience ratings based on NSS data and those based on alternative measures.

We support efforts to improve NSS data availability for providers. As outlined in our response to Proposal 5, the Academy remains sceptical of the NSS’s value as a measure of teaching quality. Extending the coverage to students on shorter courses will be necessary for effective assessments of this provision, though this must be handled sensitively. We agree that lowering the NSS response rate publication threshold would not be appropriate, as it risks further undermining confidence in the survey. However, we support exploring greater use of the NSS qualitative comments to inform the assessments. This will likely strengthen the NSS as a measure of teaching quality by enabling assessors to make more nuanced judgements.

9b. What are your views on our proposal not to rate the student outcomes aspect where we do not have sufficient indicator data? You could include comments on the proposed approach to determining whether the data is sufficient (this is expanded on in Annex G).

The Academy agrees with the proposal not to rate providers on the student outcomes aspect where there is insufficient indicator data. Using incomplete or misleading data would pose clear reputational risks for providers. Annex G suggests that between 10 and 15 per cent of registered providers may fall into this category. While we support safeguards that prevent providers being assessed or subject to intervention on the basis of insufficient data, this risk demonstrates the inherent limitations of attempting to assess providers on student outcomes data through the TEF.

³⁰ Higher Education Policy Institute (2025), [Student Academic Experience Survey 2025](#), p. 6.

We understand the rationale for not applying coverage tests to continuation and completion indicators, which naturally cover most students. However, we strongly encourage applying coverage tests to the progression measure and any post-study indicators based on employment and salary data. As noted in our response to Proposal 7b, we caution against overreliance on this data in TEF assessments. Nevertheless, if these measures are to be used, stringent tests must be applied to ensure their quality before they inform TEF judgements.

We agree with prioritising continuation data when determining the sufficiency of data, as continuation is arguably more closely related to teaching quality than other outcomes measures. However, we remain opposed to the emphasis placed on student outcomes data in TEF assessments, as explained in our response to Proposal 7. While the statistical test outlined in Annex G appears sound, using these indicators in an exercise intended to measure teaching quality remains flawed.

Proposal 10: Student evidence and involvement

10a. What are your views on our proposed approach to including direct student input in the assessment of the student experience aspect for all providers? You could include comments on alternative ways of gathering student input where student submissions are impractical.

The Academy supports OfS' proposal to include direct student input on the student experience in all TEF assessments. We welcome the removal of student outcomes from student submissions, which may reduce burden on students. Where standalone submissions are impractical, we support alternative mechanisms such as focus groups or commissioned feedback to gather student views.

10b. How could we help enable more student assessors from small, specialist and college-based providers to take part?

Expanding the pool of student assessors to include those from smaller, specialist, and college-based providers is important to capture the full diversity of student experience. Proportionate participation expectations, accessible training, and flexible arrangements will be needed to ensure involvement is feasible without placing undue burden on students or providers. These measures would help panels draw on diverse perspectives while maintaining the integrity and rigour of the assessment process.

Proposal 11: Assessment cycle

11a. What are your views on our proposed approach to scheduling providers for their first assessments? You could include comments on:

- **the factors we should consider in scheduling assessments**
- **any types of significant events that should lead us not to schedule an assessment in that year**
- **the sequencing of Teaching Excellence Framework (TEF) assessments and access and participation plan (APP) approvals.**

The move from a regular, recurring exercise, such as the REF, to a rolling cyclical, cohort-based assessment model necessarily involves trade-offs. A cohort-based model may be more agile and responsive, offering opportunities for iterative learning between assessment cycles. Yet ensuring consistency in judgements across cohorts of providers assessed in different years will present inevitable challenges.

The inclusion of student outcomes data in TEF assessments poses difficulties for a cyclical model. As detailed throughout this response, there is strong evidence that student outcomes data reflects the shape of the economy into which graduates enter – including local level market conditions – more than the quality or value of their degree.³¹ (1). For example, had a cohort of providers been assessed using data collected immediately after the COVID-19 pandemic, outcomes would have been negatively affected despite no direct link to teaching quality. TEF assessments are intended to inform prospective students about the quality of teaching and learning they can expect. We are concerned that prospective students may not be well-equipped to interpret this context when comparing ratings across different years. Providers receiving low ratings could face interventions and penalties from the OfS, with subsequent impacts on student recruitment, due to factors beyond their control. For these reasons, and those set out in our response to Proposal 7, we urge the OfS to reconsider the use of narrow benchmarks based on graduate salary and employment data, particularly in a cyclical, cohort-based TEF.

Other aspects of the proposed schedule for TEF assessments require further clarification. This includes the criteria for selecting providers within each cohort – whether through a risk-based approach, another metric, or random allocation – and the OfS’ definition of a ‘significant event’ that would justify delaying a scheduled assessment.

As the national academy for social sciences and humanities, we are acutely aware of ongoing course closures and departmental restructuring driven by financial pressures at many providers. Such upheaval could reasonably constitute a ‘significant event’ warranting a delay to a TEF assessment. Yet the OfS may equally view this disruption as grounds to expedite assessment, in order to monitor its impact on students’ learning experiences. Given the scale of cuts and course closures, particularly in the SHAPE disciplines, clarity on this point is needed to understand how the sector regulator intends to respond to financial pressures and their consequences for learners.

11b. What are your views on our proposed approach to scheduling providers for subsequent assessments?

The Academy recognises the merit of affording providers with higher TEF ratings longer intervals between subsequent assessments. This approach is consistent with practice in other educational inspection regimes, such as Ofsted, and provides a proportionate means of recognising strong performance while reducing unnecessary burden.

Section 3: A risk-based system of incentives and interventions

Proposal 12: Risk monitoring

12. Do you have any comments or evidence about the factors associated with risks to quality that might be included in the draft risk monitoring tool at Annex I?

The Academy agrees with the need to identify and act on appropriate risks to quality, both to safeguard strong teaching and learning experiences for learners and to ensure positive

³¹ Universities UK (2019), [The uses and limits of Longitudinal Education Outcomes \(LEO\) data](#); GuildHE (2024), [The Value of Creative Graduates](#).

working conditions for teaching and support staff. We support many of the criteria identified as threats to quality, including high student:staff ratios, significant increases in student recruitment, and increased partnership provision. In general, it is appropriate for the OfS to intervene quickly to support providers facing challenges that may present risks to quality.

We also welcome the commitment to updating the risk monitoring tool, recognising that changes in wider contexts will likely lead to new risk factors emerging over time. Similarly, we may see shifts in teaching and learning practice, including in response to technological changes such as the wider use of generative AI. Such shifts may necessitate a re-evaluation of existing risk factors, such as high student:staff ratios, if these follow greater use of generative AI as currently anticipated.

We would emphasise, however that many of the criteria identified by the OfS – such as increased staff:student ratios, recruitment of students with lower tariff profiles, and increased partnership provision – should be understood as symptoms of systematic pressures in an increasingly marketised higher education environment. Providers have been encouraged to compete for students with the expectation that competition would drive quality. In practice, these policy changes have instead led to greater risks to the quality of provision. We appreciate the OfS' recognition of this dynamic and hope there will be further opportunities to reflect, in dialogue with the sector, on the negative consequences of increased competition for teaching quality in the higher education sector.

Proposal 13: Incentives and interventions

13. Do you have any comments about the proposed set of incentives and interventions associated with Teaching Excellence Framework (TEF) ratings? You could include comments on:

- *the principle that growth in student recruitment should take place at high quality providers*
- *the potential to link eligibility for new degree awarding powers (DAPs) awards, or extensions to existing DAPs, to higher TEF ratings*
- *the approach to determining a breach or increased risk of breach, following TEF rating decisions*
- *whether there are any other incentives and interventions we should consider.*

The Academy has serious concerns about the proposed set of incentives and interventions associated with TEF ratings. These proposals risk transforming the TEF into a punitive system for monitoring a quality baseline and enforcing regulatory compliance, rather than an exercise designed to enable excellence in teaching and learning and reward best practice. We are also concerned that flawed criteria for determining TEF ratings, as outlined throughout this consultation response, may result in providers receiving TEF ratings they do not deserve, with far more severe penalties than in previous TEF assessments.

We disagree with the framing of how TEF ratings are regarded within the sector. Paragraph 189 notes that under the current system, the only incentive for a provider to improve above a Bronze rating is reputational and that this is insufficient. We do not accept that this is an insufficient incentive. Other regulatory processes already exist to ensure compliance, including adherence to B conditions of registration. Providers value their positive TEF ratings and the reputational benefit they bestow: this is reflected in the OfS' own assessment

of TEF 2023.³² In our view, a TEF rating is incentive enough for providers to address issues in teaching quality. From their inception, TEF ratings were intended to highlight teaching quality for prospective students, enabling informed choices – which the rating system supports. Adding punitive interventions risks undermining the value of TEF ratings and further shifting the framework towards regulatory compliance rather than spotlighting and championing best practice.

We are particularly wary of the potential adverse effects of punitive measures such as student number controls or limiting Degree Awarding Powers (DAPs) for providers with Bronze ratings. Such measures risk creating a vicious circle: lower performance on TEF metrics leads to lower ratings, which trigger interventions that exacerbate providers' challenges rather than support improvement. Furthermore, punitive measures could cause regional providers to become destabilised and shrink provision, creating or exacerbating 'cold spots' in subject provision. Interventions in response to lower ratings should be designed to enable providers rated Bronze to improve their ratings and work towards offering higher quality provision. This is especially the case for providers with Bronze ratings, who have been judged to meet minimum standards, rather than those rated as 'Requires Improvement', where stricter intervention may be required.

We also note potential overlap between interventions proposed for the TEF and existing OfS powers relating to conditions of registration. Measures intended to reduce burden and streamline processes must avoid combining incompatible activities, which could create unintended consequences and reduce clarity for providers.

Finally, we are mindful of the wider context including the Post-16 Education and Skills White Paper, which proposes expanding OfS regulatory powers and linking TEF ratings to eligibility for tuition fee uplifts. We remain concerned about the potential misuse of the TEF in this context, particularly the risk of penalising providers based on flawed metrics beyond their control and reflecting a narrow view of the value of higher education. We look forward to further engagement with government and the OfS on these matters, recognising both their sensitivity and their significance for the future of the sector.

Section 4: Published outputs of the overall system

Proposal 14: Published outputs

14a. What are your views on the range of quality assessment outputs and outcomes we propose to publish?

The Academy supports the principle of publishing quality assessment outputs and outcomes in the interests of transparency. Accessible outputs benefit both providers and students by ensuring clarity and accountability.

However, as noted in our response to Proposal 4, we do not support the proposal to publish an 'overall rating' based on the lower of the student experience and student outcomes rating. We believe this approach would confuse providers and prospective students and would not serve to drive improvement in teaching and learning.

³² Office for Students (2023), *Evaluation of the TEF 2023*, p. 43.

14b. Do you have any comments on how we could improve the usefulness of published information for providers and students? You could include comments on areas such as:

- **whether the OfS should have a role in sharing good practice, and how we should do so**
- **the presentation of Teaching Excellence Framework (TEF) outcomes for providers that are not rated for student outcomes.**

The Academy strongly welcomes the proposal for the OfS to play a role in sharing good practice from TEF assessments. Highlighting best practice should be central to enabling improvement in teaching and learning in higher education and should be seen as a core function of the TEF. We encourage the OfS to share good practice across a wide range of disciplinary areas, including both SHAPE and STEM, recognising that teaching and learning is often highly discipline-specific and not easily transferable across disciplinary areas.

Sharing good practice through the TEF also closely aligns with commitments in the OfS' Strategy 2050-30 to being '(v)ocal that higher education is a force for good, for individuals, communities and the country'.³³ Measures that promote positive stories about the HE sector, including high quality teaching and learning, would align closely with this ambition and should be strongly welcomed by providers.

We would particularly welcome the publication of case studies, with providers' consent, on the OfS website. The OfS already hosts a collection of case studies from TEF 2023 (2), and the move to a cyclical TEF provides a strong case for establishing a dedicated space for such examples. These would be valuable not only for providers seeking to understand what constitutes good practice, but also for wider observers of the sector, who would gain insight into the high quality teaching and learning taking place across higher education.

Finally, we agree that providers not rated for student outcomes due to insufficient data should not suffer reputational harm. We support OfS' exploration of how to display this information neutrally TEF assessment and look forward to engaging with future consultation on this matter.

Section 5: Implementation, ongoing development and evaluation

Proposal 15: Implementation timeline

15. Do you have any comments on the proposed implementation timeline?

The Academy considers the proposed implementation timeline broadly sensible in the context of the move to cyclical TEF assessments. However, we are concerned that plans to assess all providers by autumn 2030, with the first cohort assessed in spring 2028, may be overly ambitious. Ensuring sufficient preparation time and sector readiness will be critical to the credibility and effectiveness of the new system.

We strongly encourage consultation with relevant stakeholders in the development of a taught postgraduate (PGT) survey. National Academies, learned societies and subject

³³ Office for Students (2025), *The OfS Strategy 2025-30*. [accessed 27 November 2025]

associations are well-placed to represent the needs of PGT students in English higher education and to ensure that the survey reflects the diversity of postgraduate provision.

Additional proposals (including plans for publication of TEF ratings during transitional period and development of plans to include PGT provision)

16. Do you have any comments on the two options we have set out for how we could approach publication of Teaching Excellence Framework (TEF) ratings during the transitional period, or suggestions of other approaches we could take?

The Academy considers option A (archiving the published TEF 2023 outcomes from autumn 2028) to be the most appropriate course of action. Given the relatively short transitional period, it is important to avoid confusion for providers and students – particularly around admissions and Clearing cycles - that could arise from TEF ratings under different assessment approaches being advertised simultaneously.

Archiving the TEF 2023 outcomes would make it clear to all that these ratings are historical, while ensuring they serve their core regulatory function.

17. Do you have any comments on our approach to ongoing development, or our plans to prepare for the future inclusion of taught postgraduate provision?

The Academy welcomes the OfS' commitment to the ongoing development of the TEF and its plans to prepare for the future inclusion of taught postgraduate (PGT) provision and indicators relating to modular provision. It is vital that the TEF evolves in ways that recognises the diversity of learners enrolled across higher education providers.

As outlined in our response to Proposal 3b, the specific demands of PGT provision necessitate sustained and meaningful engagement with relevant stakeholders. While we welcome the OfS' commitment to develop a national survey for PGT students and consider the timeline reasonable, we urge widening the scope of this exploration. Consultation should include not only students, but also academic and professional staff, and learned societies and subject associations, who are best placed to speak to broader disciplinary best practice.

At this early stage, we recommend the following priorities for the OfS' preparations:

1. **Iterative design:** Commit to an iterative approach to PGT TEF development, underpinned by meaningful engagement with providers, learned societies, and students. Publish clear timelines for development, including opportunities for sector input, to ensure changes are evidence-based and well understood.
2. **Specific PGT indicators:** Develop tailored indicators for student experience and outcomes, allowing for qualitative reflection and contextualisation across disciplines. These should capture the development of specialist research skills, wider cultural contributions, and professional development.
3. **Recognition of cohort diversity:** Ensure the framework reflects the diversity of PGT cohorts, including international students, part-time learners, and mature learners undertaking career change.
4. **Equity considerations:** Embed equity into TEF design, recognising structural barriers to postgraduate participation for underrepresented groups, which differ from those at undergraduate level.

5. **Avoiding narrow economic measures:** Ensure integration of PGT provision does not reinforce reductive economic measures of value. A high-quality postgraduate experience encompasses intellectual development, research capability, and societal contribution, not simply salary or job title.
6. **Consultation and piloting:** Undertake detailed consultation and piloting before implementation, working closely with providers and learned societies to ensure the framework reflects the realities of postgraduate education.

In summary, we welcome the OfS' commitment to early planning for PGT inclusion, but urge a proportionate, transparent, and collaborative approach. The TEF must recognise the diversity of postgraduate provision and avoid metrics that risk distorting the value of disciplines central to the UK's cultural and civic life.

18. Are there aspects of the proposals you found unclear? If so, please specify which, and tell us why.

No response.

19. In your view, are there ways in which the objectives of this consultation could be delivered more efficiently or effectively than proposed here?

No response.