



## CONSULTATION RESPONSE

### Independent Review of TEF – call for views: March 2019

---

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

MillionPlus supports the aim of recognising and promoting the quality of teaching excellence student outcomes but disagrees with many elements of the TEF as currently managed.

#### **Why have TEF?**

Benchmarked information about performance is extremely useful for providers of higher education, as well as for stakeholders (including potential students). Universities have always used evidence and data about performance to identify ways in which they can enhance and improve the quality of the educational experience.

The TEF should not be used to create league tables, nor to inform differential fees

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

The criteria are valid to use to assess performance by providers in particular areas. In fact, most of them (e.g. those measured using metrics drawn from the National Student Survey) have been used in some way for over a decade to assess and compare universities, as well as by universities to understand their strengths and their areas for development. To that extent, they are appropriate as measures of a student's subjective satisfaction with the education they are receiving.

However, none of the criteria in the TEF directly measure excellence in teaching, which is the aim of the TEF. They are, as widely acknowledged, proxies. They do not measure teaching excellence, or even excellence in learning. They measure satisfaction, perception, facilities within universities and a range of personal trajectories that occur after graduation. These are assumed to be proxies for excellent teaching, but in the renaming the exercise in 2017 to include "Student Outcomes" the government implicitly concedes it is not able to measure teaching excellence as such.

It is the linking of these assessments and measurements to a judgement regarding teaching excellence that is inappropriate. This link, and the name of the framework, inevitably means that users of the information (particularly those without specialist higher education knowledge) will assume that these assessments say something about where the best university teaching takes place. The assessments are useful pieces of information a part of a wider picture for prospective students, but an attempt to bring them together under a single, and blunt rating arguably diminishes their value and their use. The metrics used in the TEF are complex areas to understand, with multiple variants and many influencing factors, many of which are beyond the control of the institution. The data and evidence contained in the framework are rich, informative and powerful, but the way in which they are corralled into the TEF exercise under a single umbrella rating undermines this and may prevent people from engaging with the detail.

Outcomes are impacted by the overall university environment and the student's personal aspirations and social background, not just the teaching experienced by a student. In addition, their own individual

---

engagement with opportunities will also have a significant influence. The TEF criteria takes no account for any of these factors.

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

**a. Are the metrics used in TEF the best proxies for measuring the TEF criteria (see Figure 1 for a list of the criteria and metrics)?**

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

The criteria and the metrics both have the same inherent issue – they are proxies not measures of the thing that is being assessed (teaching quality). This issue presents itself in two ways. Firstly, the inappropriate conflation of all of these assessments to indicate the quality of teaching at university. Secondly, the “devaluing” of these assessments within their distinct domains in their own right. By assuming that these assessments are measurements of quality, there is a risk that their real importance and use is ignored. For example, graduate outcomes– be they employment, salary or wellbeing – are a fundamental part of understanding the influence and contribution of universities on the success of graduates. They are key elements in a complex conversation about the value of higher education but forcing them into a narrow lens means that much of this complexity is lost.

In its recent report, “The future of the TEF”, UUK criticises changes to the TEF that have resulted in what it sees as an excessive focus on salary data. This is based on the observation that the learning outcomes criterion are completely defined by salary data and around half of the weighting of all the core metrics are based on employment outcomes. UUK argues that the TEF should not become an instrument for driving student outcomes “to the detriment of the breadth and richness of higher learning” and calls for the weighting of the metrics to be reviewed.

Any other metrics and criteria will face the same challenges – they are going to be proxies and are likely to have the same sorts of issues if used in the TEF. An alternative solution could be to explain the criteria and metrics in a clearer way, focusing on what they are assessing and avoiding any implication that these are about teaching excellence or the quality of courses. They say important things about the higher education experience that should be heard, understood and engaged with.

**The TEF metrics are benchmarked to account for factors such as the subject of study, prior attainment, ethnicity and educational disadvantage of the provider’s student intake (see that ‘What is TEF?’ section for detail).**

**a. Should the metrics be benchmarked to allow for difference in a provider’s student population?**

**b. Does TEF benchmark for the right factors?**

Benchmarking is fundamental. It is impossible to compare higher education providers directly without taking into account a range of factors. It is vital that the TEF does this, not just to ensure fairness but also to be able to provide interested parties (future students, employers) with accurate, robust information about the value and contribution of different providers. Higher education is about identifying and developing an individual’s potential. Without benchmarks, universities that do the most to broaden participation by recruiting a more socially inclusive population may be unfairly penalised because of factors outside their control (e.g. prior attainment, secondary school experience, social background). With this in mind, benchmarking to account for regional variations may be appropriate to consider.

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

**a. What are your views about the balance of quantitative and qualitative evidence considered in arriving at ratings?**

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

While metrics can be of enormous use and value in assessing areas of higher education performance, the complexity of the sector (both within and between providers) means that expert, human judgement is vital. Peer-review is a core element of higher education, in both research and teaching, and so just as the REF is at its heart a peer-review exercise, so must be the TEF.

It would be possible to emphasise the importance of peer review and the qualitative aspect of the exercise by removing the step of an initial hypothesis and instead providing that data to institutions to include in their submission. As it stands, the balance is clearly on the quantitative data, with the qualitative data being classified as "additional", so presumably superfluous. These comments echo some of the points made in the aforementioned UUK report, which argues that the TEF should move towards an approach that is "metrics-informed" rather than one which is solely or overwhelmingly focused on metrics through the initial hypothesis.

Reshaping the TEF into 2 steps rather than 3 is one way to achieve this. Step 1 would be a submission that combines benchmarked metrics data drawn from central sources by the Office for Students with a statement from the provider that includes institutionally sourced data and evidence. Step 2 would be the holistic judgement where, as now, assessors review all of the evidence and make a best-fit judgement against the rating descriptors. The metrics data will still be available, but the TEF would benefit from each provider receiving an overall judgement at the end of the exercise, based on all of the available evidence rather than an interim judgement based on partial evidence that can prompt incorrect assumptions.

**Are the purpose(s) of TEF met by:**

**a. awarding a single rating?**

**b. with three levels of differentiation, plus a fourth rating for those unable to be assessed?**

**c. ratings named Gold, Silver, Bronze and Provisional?**

The answers to the preceding questions demonstrate MillionPlus' objections to awarding a single rating.

In addition, MillionPlus has always been concerned about the blunt, arbitrary and (to some extent) artificial differentiation of the TEF ratings. All providers in England have to reach high standards to enter the system (through the OfS gateway to be published on the register), which includes being quality assessed. That the TEF is a government policy, these ratings are obviously going to be interpreted as official, central judgements on providers. The ratings create the impression that providers rated Bronze are poor and low quality, when in fact they are reaching high standards of quality that are internationally comparable. The importance of reputational benefit that the TEF confers onto providers and the sector must be taken into account, and attention paid to how language can create particular perceptions.

The ratings lack context and fail to properly explain and articulate the contribution, strengths and value of individual providers. They are simplistic and suggest the sector is populated by winners and losers. In fact,

excellence is achievable by all. For example, in the Women's 100m Olympic Final, all finalists are excellent, not just the individual that crosses the line first marginally ahead of the other runners.

As expected, the publication of the ratings has led to the creation of new league tables that have the potential to misdirect the public.

**If you answered no, what alternatives you would suggest:**

**a. For provider-level TEF?**

**b. For subject-level TEF?**

**c. If your previous response(s) reflected on the impact of the TEF on the international reputation of institutions and/or the UK as a whole, we would welcome any evidence or information you can provide that might support your view or help inform the independent review.**

Rather than a single rating, the results of the TEF could be published as a dashboard, enabling users to understand and engage with performance across the entire range of assessment areas. The new dashboard proposals for the KEF issued by Research England could be a useful example from which to draw influence. In the TEF outcomes, institutions could receive a dashboard visualization that shows performance in each of the criteria on a radar chart, therefore avoiding a single rating.

If there need to be single ratings, rather than somewhat clumsy sporting metaphors, then more descriptive terms could be a better approach. For example:

*Good*

*Excellent*

*Outstanding*

Descriptive language of this nature outlines that all providers receiving these ratings have already reached a high standard in order to be on the OfS Register. This change would increase understanding of the award and avoid unnecessary and unfounded perceptions or judgments.

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

There is no evidence of this, although it is clear that providers will use the information available to identify areas for development. The results from the National Student Survey were already contributing to intra-institutional conversations about quality improvements (as well as to league tables and comparator websites) so TEF in itself has not created significant change or impact in this area.

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

There is no direct evidence of this at this stage, however the risk is there that the TEF and the metrics used lead institutions to avoid recruitment of students from disadvantaged backgrounds or with complex characteristics in order to maximise their performance. The other risk is that because of the bluntness of the ratings and lack of context, students could select a gold rated provider on that basis, but which does not have sufficient expertise to offer them the support they require to be successful. There is also the risk of closure of subjects that, despite being popular or of value, result in low TEF scores.

**Has the introduction of TEF impacted positively on research and/or knowledge transfer? If yes, how?**

There is no evidence of this that we are aware of.

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

There is no evidence of this that we are aware of.

**Does TEF help you as a student/student union/provider/employer/other? Please explain the reasons for your answer.**

**Explaining your reasoning, what are the most significant costs of:**

**a. Provider-level TEF?**

Significant staff resources are required to manage the data requirements of TEF and to create the narrative statements. This is in addition to existing regulatory requirements, and the REF submissions. In smaller institutions responsibility for this work often rests with a limited number of individuals. The TEF has created the need for additional processes and procedures, on top of those already required by the new regulatory framework. While it is right that providers are accountable, the more time that is spent on these requirements the less time is available to support students. This is also true regarding the cost of TEF – money spent on this is then unavailable to invest in the student experience.

**b. Subject-level TEF?**

The subject-level TEF replicates the costs of the provider level TEF.

All institutions will face an increasing resource challenge in meeting the submission needs of a subject-level TEF and this will be particularly acute for smaller universities. There is a risk that these additional costs and efforts will in turn lead to a refocusing of resource from activities and work which would more directly benefit students.

**Explaining your reasoning, what are the most significant benefits of:**

**a. Provider-level TEF?**

The information and benchmarking provide institutions with useful evidence and data about performance that supports quality enhancement.

**b. subject-level TEF?**

The information and benchmarking provide institutions with useful evidence and data about performance that supports quality enhancement.

**The review will also consider whether the overall TEF process delivers effectively for all across a diverse sector. In the following question, we are particularly interested in views about:** •providers in Scotland, Wales and Northern Ireland;

- harder to reach applicant/student groups;
- part-time students and part time provision;
- small providers;
- specialist providers and specialist provision;

**•private providers;**

**•further education colleges providing higher education.**

**Are there particular types of students, provision or providers that are disadvantaged by the current design of TEF, in a disproportionate way? If so, what changes could be made to address this?**

**Are there particular types of students, provision or providers that are advantaged by the current design of TEF, in a disproportionate way? If so, what changes could be made to address this?**

The TEF is not good at taking into account students with multiple, overlapping characteristics of disadvantage. It simplifies students into particular groups but does not as yet look at intersections or interactions. The TEF also, as noted above, uses factors that providers are unable to control (salary, career choices of graduates) as an indicator of quality.

Providers in areas of the country where salary and high-skilled jobs are lower/more scarce will face disadvantage. Salary and employment data are not good at accounting for the choices of people in portfolio careers, self-employment or business ownership. This means that providers offering courses where that is a common outcome (e.g. creative subjects) will face a disadvantage.

Although the TEF is only mandated for English providers, there is a risk that internationally it is seen as a UK-wide exercise that offers a government-led view on higher education institutions. Providers in Scotland, Wales and Northern Ireland risk being viewed unfavourably by potential students who develop negative views on account of them not having participated in TEF. Scottish, Welsh and Northern Irish providers will therefore have to invest time and effort into countering these negative perceptions.

The TEF disadvantages students who do not follow the traditional, away-from-home, three-year degree route. This includes part-time students, mature students, apprenticeships, students who commute to universities and live-at-home students. These students are also often from disadvantaged backgrounds and under-represented groups. This creates two possible risks. One, that those students do not receive the information needed to make their choice, and two, that providers seek to "strengthen" their TEF rating by avoiding recruitment of these students.

These points are reinforced by UUK in their report on the TEF when they argue that one of the key challenges that remains unresolved for the TEF is an imbalance against mature students or those re-skilling, particularly in areas of the country where labour markets are relatively less strong and also in emerging sectors that do not have immediately strong economic returns.

TEF is predicated on the notion that improving information about the quality of courses will create competition and choice for students. However, many students have no choice over their provider. For different reasons – e.g. unable to travel, course only available at one place, decision taken by employer – a student may only be able to study at one particular provider. TEF therefore needs to be capable of providing those students with accurate, digestible, useful information about the nature of the course and the provider. An emphasis on overall rating and performance relative to other providers may harm this.