



Teaching Excellence Framework Technical Consultation – Response Form

Name/Organisation:

Alan Palmer, Head of Policy and Research

MillionPlus

alanpalmer@millionplus.ac.uk

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

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

Question 1 (Chapter 1)

Do you agree with the criteria proposed in Figure 4?

Yes No Not sure

Please outline your reasons and suggest any alternatives or additions.

MillionPlus has had longstanding concerns about the criteria proposed for the TEF which were outlined in our [response](#) to the Green Paper that was published in November 2015.

We welcome the government's amendment of the timetable to delay the introduction of TEF Year Two and, by allowing universities to increase fees with inflation from 2017/18, the acknowledgement that the university experience requires investment if students are going to benefit from high quality teaching and academic support.

However, if the TEF Year Two is to be introduced, MillionPlus still believes that more thought needs to be given to how it is constructed before it is allowed to impact on the sector.

The criteria to be used are still proxy measures that were established for the purposes of measuring other elements of higher education. While these are to some extent measures of a successful student experience, they do not in themselves measure quality of teaching. We would like to see far more piloting and evaluation of these measures over a longer timescale rather than the very short 6-month pilot that the government has committed to holding between autumn 2016 and spring 2017. This would provide the government with the opportunity to attain a far better evaluation of how the assessment panel will convert the scores into grading.

Although the TEF is optional for them, a longer pilot would also provide more opportunity for discussions in particular with universities in Scotland over the use of quality enhancement review in TEF Year Two assessment.

A key issue is that the TEF assessments made in year two and beyond will be based on imperfect proxy measures (employment, retention, satisfaction) with other, more direct measures possibly incorporated at later stages. The learning gain projects being piloted by HEFCE may provide some additional information (although they imply standardised assessments) but they will not be available for 3 years. However, it is perfectly possible that TEF Year Two will simply replicate the current measures available and lead to institutions being engaged in considerable additional effort on the basis of these proxies.

A further risk is that by applying these criteria in this way, and assessing them in the way proposed via a panel approach, the government will be standardising and homogenising the university experience. Although we do not support an approach based solely on metrics, the panel will need to review submissions in a coherent, consistent way which may lead inadvertently to a narrow concept of what success looks like. Diversity and innovation of provision are the hallmarks of the successful UK higher education sector, but it is perfectly conceivable that universities will seek to limit that diversity and innovation so as not to risk their standing in future TEF assessments.

A factor in considering the assessment of diverse provision is how the TEF will deal with providers with large numbers of students in areas such as healthcare and nursing, or education (where undergraduate education students and PGCE students may share courses).

It is also not clear how the introduction of the TEF to assess these areas will improve the amount, nature and accuracy of the information that is available to potential students and other interested stakeholders. The White Paper acknowledges that these measures are proxies, so we are concerned that the government is set on promoting them to students in spite of their limitations.

Question 2 (Chapter 3)

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

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

Yes No Not sure

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

Yes No Not sure

Please outline your reasons and suggest any alternatives.

HESA is currently consulting on how to measure graduate outcomes. Given this, we are disappointed that the government will be using this criteria as part of the TEF assessment. If following their consultation HESA changes the approach to measuring outcomes, TEF assessments based on the previous measure may be seen as less reliable or not easily comparable. This would be against the interests of students and universities.

There are significant problems with surveying graduate outcomes after six-months as a measure of success and as a TEF Year Two metric. We would not support including graduates who are unavailable for work or further study. Whether the survey includes all or some graduates, then the government must ensure that there is sufficient context to understand the nature of initial destinations and of the impact of certain types of provision (for example, foundation degrees).

First, graduates may themselves have other markers of success that are not based on securing a particularly job within the first six months.

Second, the survey does not adequately capture patterns of employment specific to particular graduates or sectors. For example, many graduates in the creative industries work in jobs unrelated to their degrees initially, often at lower than average salaries, to provide them with the space and opportunity to build their practice and portfolios. Success for these graduates comes later than six months after graduation. This is often the case with graduates who are self-employed, engage in business start-ups or work in small family businesses.

These concerns are additional to the fact that successful graduate employment is influenced by local employment patterns and regional economic outlooks that are entirely unrelated to the experience and achievements of students or the quality of their teaching at university. For example an area with high employment may superficially appear to suggest that particular universities are 'better' than those in areas of low employment.

If the survey is to include all graduates, then the government must ensure that there is sufficient context for students and other stakeholders to understand the limitations of relying on initial destinations.

Analysis of HMRC data by the IFS and other research confirm that family background is highly influential in determining graduate destination and employment prospects. It is difficult to see how these findings have been taken into account in respect of the government's decision to use this particular metric.

The government acknowledges in the consultation that there is no universally accepted list of graduate jobs, and that there are concerns that the Standard Occupational Classification groups can be misleading. MillionPlus concurs with these concerns.

As noted in the consultation some roles in groups 1-3 are not necessarily graduate jobs. Equally, some roles in groups 4 and below do require a degree for entry. Employers make decisions about what attributes are necessary for the jobs in their businesses, and arguably it is they that decide that a particular role is a 'graduate job' rather than a centralised approach such as the TEF is proposing.

Question 3 (Chapter 3)

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

Yes No Not sure

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

Yes No Not sure

Please outline your reasons if you disagree.

Although the consultation explains why the TEF benchmarks will be flagged if there is a 2% deviation, compared to 3% in the standard performance indicators, MillionPlus does not think this is sufficient justification for a different approach. The consultation appears to be suggesting that the 2% deviation has been chosen simply to provide differentiation between providers, rather than because it is a reasonable, fair measure in itself by which to make assessments.

The government needs to provide more evidence for this decision, and along with HEFCE, explain why two measures using the same data source will judge success of the same thing in different ways.

MillionPlus also believes that the government should explain in more detail what it will mean for a provider that falls outside the benchmark. Will they be sanctioned in some way? Will this become a limiting grade that means the provider cannot achieve anything other than the first level TEF award? This goes to the question of why and what the government is trying to assess.

Question 4 (Chapter 3)

Do you agree that TEF metrics should be averaged over the most recent three years of available data?

Yes No Not sure

Please outline your reasons and suggest alternatives.

MillionPlus supports the use of metrics over multiple years, as that will smooth any yearly blips or volatility. However, we would also expect that this approach will be able to take account of individual institutional circumstances to understand where particular approaches or developments – e.g. establishing new courses, changing focus of provision that may have an impact on some of the measurements in the short-term – will be able to be contextualised. It also means that the trajectory of a provider will be taken into account when making assessments.

Question 5 (Chapter 3)

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

Yes No Not sure

Please outline your reasons and suggest alternatives.

MillionPlus agrees that the metrics need to be split and analysed by particular characteristics in order to fully understand the individual contexts of institutions, and to be able to see patterns of success with specific groups. However, this assessment needs to ensure that universities that are successful in recruiting socially inclusive student cohorts are able to demonstrate the successful work they do to widen participation and create opportunities.

We would like to understand, however, how the assessment approach will take into account issues like the overall decline in part-time and mature students that will have little to do with individual universities, and far more to do with other factors (such as government policy and funding rules).

Question 6 (Chapter 3)

Do you agree with the contextual information that will be used to support TEF assessments proposed above?

Yes No Not sure

Please outline your reasons and suggest any alternatives or additions.

MillionPlus supports the provision of contextualised information to TEF assessors. However, the government must explain in more detail how the information will be used. In particular the government needs to provide guidance to assessors to support them in making judgements.

MillionPlus believes that this should include a framework for assessment, advice to enable a full understanding of the context of a provider, and guidance on how decisions will be scrutinised and moderated.

Question 7 (Chapter 3)

A) Do you agree with the proposed approach for the provider submission?

Yes No Not sure

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

Yes No Not sure

Please explain your reasons and outline any alternative suggestions.

MillionPlus agrees that there should be an opportunity for each provider to submit a narrative statement. TEF assessments should not be based solely on quantitative judgements. The provider submission should be able to include information that demonstrates improvements and trajectories, rather than focusing only on outcomes. Outcomes are very important, but it is also necessary to understand how providers are improving their offer to students – a continual internal cycle of challenge, rigour and enhancement is an important aspect of excellence.

Although we welcome the proposal that the provider submission will be relatively light touch in the sense of specific requirements, including the absence of mandatory questions, we believe that the government needs to give some further thought to some specific advice and direction beyond technical guidance – on the lines of the REF guidance on submissions. This should be part of the pilot approach.

For comparison, the impact narrative statement for the REF underwent significant testing and revision before it was implemented to ensure that a) it was capturing the right information, b) that providers had the necessary information and c) that assessors understood how to review the information. A similar approach should be applied to the development of the TEF and the timetable for the pilot and the implementation of TEF Year Two extended.

Question 8 (Chapter 3)

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

Yes No Not sure

Please outline your reasons and suggest any additions or alternatives?

We believe that this needs to be part of the pilot phase. The government should encourage any example of delivery, and allow those providers taking part in the pilot to put forward any evidence they believe supports their claims. Allowing this open approach will ensure the pilot can identify the widest range of examples of diverse delivery and provision.

Question 9 (Chapter 4)

A) Do you think the TEF should issue commendations?

Yes No Not sure

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

Yes No Not sure

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

MillionPlus is opposed to the proposal to offer commendations which appears to be effectively instigating a set of government approved 'kitemarks' or standards. This runs the risk of centralising standards and approaches, leading to homogenisation in the sector and limiting diversity and innovation. There is also the risk that these commendations would be based on subjective judgements by different assessors who may place value on different elements of provision, and have their own particular biases or prejudices.

We are also unsure about what purpose a commendation will actually serve. It is not clear that a commendation will provide any particular reputational or financial benefit to students, employers or providers. This approach, like much of the TEF, seems to be attempting to create differentiation for the sake of it.

Question 10 (Chapter 4)

Do you agree with the assessment process proposed?

Yes No Not sure

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

The assessment process appears reasonable. However, MillionPlus would support the inclusion of an opportunity for challenge and appeal by providers, particularly as there is significant reputational and potentially financial benefit associated with TEF outcomes. The government should also provide greater clarity on the proposed process for announcing and publishing the outcomes of the TEF assessments.

Question 11 (Chapter 4)

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

Yes No Not sure

Please outline your reasons.

MillionPlus does not support the proposition that providers with less than three years of core metrics should participate in the TEF. This will create a two tier system unnecessarily as well as uncertainty and less transparency into the system. A different approach would be to only allow providers to submit into the TEF when they have acquired three years of core metrics, meaning that all assessments are based on the same approach.

Question 12 (Chapter 5)

Do you agree with the descriptions of the different TEF ratings proposed in Figure 9?

Yes No Not sure

Please outline your reasons and any alternative suggestions.

Notwithstanding our concerns about the TEF in general, and our view that it is seeking to create arbitrary and artificial differentiation, MillionPlus remains concerned about how the ratings will be perceived by the public, potential students and businesses (both domestically and internationally). The TEF ratings will come with government backing, and are likely to be taken extremely seriously. They will become a descriptive badge for individual providers, and will be taken as aggregate statements about the sector as a whole.

In this context, the phrase 'meets expectations' is negative. Based as it is on quality review, this judgement actually demonstrates highly successful practice and

management by an institution. A far more positive descriptor would be the word 'good' which would still enable a hierarchy of ratings as the government wants, but be a more effective and useful 'label' for institutions. In other sectors where there is a ratings and assessment process, 'good' is held up to be a reasonable category that clearly marks successful practice. The importance of the reputational benefit conferred on providers and the sector by the TEF must be taken into account, which means language can make a difference in perceptions.

MillionPlus believes that the three ratings should be:

- *Good*
- *Excellent*
- *Outstanding*

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

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

Please acknowledge this reply

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

Yes

No

BIS/16/262/RF