**Independent Review of**

**the Teaching Excellence and Student Outcomes Framework (TEF)**

**QSN Response to the Call for Views**

**Launched on 18 January 2019**

**Respond by 1 March 2019**

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# Foreword by Dame Shirley Pearce DBE

UK Higher Education has a justifiable reputation for international excellence. Our universities and other HE providers produce graduates who have a profound impact on the economic, cultural and social wellbeing of the communities in which they live. TEF is part of a process of assessing and promoting the excellence of the teaching and learning that our HE providers offer.

This independent review is an important opportunity to take stock of the TEF from a constructively critical perspective. What do we really want TEF to do? At present, TEF has two sets of aims: to provide information for students and employers and to deliver educational enhancement at institutions delivering higher education. Are these right? The call for views starts from this question and then moves to the questions that the Higher Education and Research Act 2017 (HERA) requires the review to address. It also asks about unintended consequences and invites respondents to indicate whether they think changes are needed to ensure that the TEF process is robust, resilient and fit for purpose in the future.

The review will be informed by the strongest available evidence. This call for views is part of that evidence and I am keen to seek the widest range of opinions, from providers of higher education to potential students, current undergraduates, recent graduates, as well as parents/carers, teachers, academics, careers advisors, employers, charities and the general public.

In addition to the call for views I will be holding a programme of listening sessions and commissioning specific assessments of specialist questions. These will include an independent analysis of the statistical base of the TEF process and an assessment of its international impact. In my role as Independent Reviewer, I am supported by an Advisory Group and I am deeply grateful to them for the invaluable advice they are providing.

Details about my advisory group and the work streams of the review can be found on the GOV.UK [review page](https://www.gov.uk/government/groups/teaching-excellence-framework-independent-review).

My review will ultimately make recommendations to government about the future development of TEF. I want these recommendations to be informed by the views of all involved in TEF, both from a provider and a consumer perspective.

I look forward to hearing your suggestions.



##### Dame Shirley Pearce

# Introduction

The Secretary of State for Education has appointed Dame Shirley Pearce to carry out an independent review of the Teaching Excellence and Student Outcomes Framework (TEF). Shirley invites interested individuals and organisations to submit views and supporting evidence to inform her review.

Shirley is also commissioning other research, seeking expert opinion and drawing on other data and evidence to inform her review. She is interested in understanding the widest possible range of perspectives on the TEF through this ‘call for views’ exercise.

## The Independent Review

Shirley’s remit was set out in section 26 of the Higher Education and Research Act 2017. The terms of reference for the review reflect this remit:

1. The process by which ratings are determined under the scheme [for assessing quality in Higher Education] and the sources of statistical information used in that process;
2. Whether that process, and those sources of statistical information, are fit for use for the purpose of determining ratings under the scheme;
3. The names of the ratings under the scheme and whether those names are appropriate;
4. The impact of the scheme on the ability of higher education providers to which the scheme applies to carry out their functions (including in particular their functions relating to teaching and research);
5. An assessment of whether the scheme is in the public interest; and
6. Any other matters that the appointed person considers relevant.

For more detail, please see the full [TEF Independent Review terms of reference](https://www.gov.uk/government/publications/review-of-tef-terms-of-reference).

## Enquiries

Enquiries related to the content of the call for views can be directed by email to TEF.IndependentReview@education.gov.uk.

## How to respond online

The responses will be analysed by an independent external consultancy. To help the analysis of responses, please [submit your response online](https://consult.education.gov.uk/higher-education-reform/independent-review-of-tef-call-for-views/) wherever possible.

##### Other ways to respond

Respondents are strongly encouraged to provide details of the **evidence and data** that support their positions, to enable the Reviewer to understand the basis on which those conclusions have been reached. You can send attachments to the email address below.

When responding, please do not exceed an **average of 250 words per question.**

If you are unable to use the online system, for example because you use specialist accessibility software that is not compatible with the system, responses can be sent by email to: TEF.IndependentReview@education.gov.uk or by post to: TEF Independent Review, Department for Education, Sanctuary Buildings (Ground Floor), Great Smith Street, London SW1P 3BT.

## Confidentiality

Information provided in response to a call for views may be subject to publication or disclosure under the Freedom of Information Act 2000 or the Environmental Information Regulations 2004.

Any personal data received as part of this call for views (e.g. any identifying material) will only be processed in accordance with the Data Protection Act 2018. This means that your personal data will only be used for the purpose of the call for views; it may be shared with independent analysts, but it will not be disclosed to third parties unless the law requires it and you will not be identifiable from any published reports unless you have given consent to this. Therefore, when responding, please indicate whether you are happy for your identifying details to be included in the Independent Reviewer’s report.

If you want all or part of any other aspect of a response to be treated as confidential, please explain why you consider it to be confidential. If a request for disclosure of the information is received, your explanation about why you consider it to be confidential will be taken into account, but it may still have to be disclosed if the law requires it.

## The response

The information gathered through this call for views will inform the final report of the review in summer 2019. This report will take into account evidence, including but not limited to that gathered through responses to this call for views. The report will be published on GOV.UK.

**Who are you? *– section to be completed in the final***

***version***

1. What is your name?
2. What is your role/position (if relevant)?
3. What is your email address?
4. In what capacity are you responding to this consultation?
5. Are you responding on behalf of an organisation (eg. higher education provider, student union or representative group)?
	1. If yes, what is the name of your organisation?
	2. If you are responding on behalf of a provider, has the response been approved by the governing body (or equivalent)?

*The Independent Reviewer requests that provider responses have been considered by their governing body in view of the importance of her review.*

1. Have you been involved in preparing for or writing a TEF or subject TEF submission?
2. Have you been a TEF assessor or panel member (for provider TEF or in the subject pilots)?
3. Would you like us to keep your responses confidential?

If so, what is the reason for confidentiality?

1. Please indicate which UK country/other country you are responding from.

# Why have TEF?

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

**QSN response**:

Although improving the quality of teaching is a laudable aim, we would question exactly what problem the TEF is seeking to address and whether an assessment exercise is an appropriate mechanism. Institutions are already tested against baseline quality requirements through the OfS registration process and we are of the opinion that the methodology used for TEF is not fit-for-purpose and does not meet the stated purposes of the exercise.

Furthermore, the metrics provide some insight into the student experience of higher education but there are aspects that have only a limited relationship with teaching quality, such as earnings data and grade inflation data, and no definition of ‘teaching excellence’ has yet been established. However, we do welcome the fact that TEF has begun to address the issue of parity of esteem between research and pedagogy within the HE sector.

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

* better inform students’ choices about what and where to study;
* raise esteem for teaching;
* recognise and reward excellent teaching; and
* better meet the needs of employers, business, industry and the professions.
1. These purposes fall into two main areas: providing information, and enhancing the provision of higher education.
	1. Which of these is the most important (select one option only)?
		* Providing information
		* Enhancing provision
		* Both are equally important
		* Neither are important

**QSN response**: Enhancing provision

* 1. Please outline below the reasons for your answers

**QSN response**:

Although students may benefit from improved, independent and transparent information on their study options the recent DfE Evaluation of Provider-level TEF in 2016/17 found that the

TEF informed the decision of where to study of only 15% of applicants.

There are also other mechanisms for providing information, such as Key Information Sets data, and the whole area of information, advice and guidance requires attention. The principal aim of the exercise, if it is to continue, should be in raising the profile and standards of teaching in the sector.

Given the resources required to undertake TEF – especially if subject TEF is to be introduced – there needs to be a clear benefit derived by the sector in engaging with the process.

1. Should there be any other purposes for TEF?

**QSN response**: No

# What is TEF?

This section provides some information about how TEF is currently designed and being delivered to help inform your response. This overview of TEF should be considered when responding to the remaining questions in this call for views. In particular, when considering Terms of Reference 1 and 2 in the next section.

The TEF is a national exercise, introduced by the government in England and open to all UK higher education providers. It assesses excellence in their teaching and how well they ensure excellent outcomes for their students in terms of graduate-level employment or further study. Providers are given one of three ratings – Gold, Silver and Bronze – or a provisional award if they do not yet have sufficient data to be fully assessed.

The diagram in Figure 1 provides an overview of the current TEF scheme (and elements proposed for subject TEF) and the process by which the ratings are determined. This shows that TEF draws on a mixture of quantitative and qualitative evidence. This includes measures drawing on existing quantitative data, all of which are gathered for other purposes, and a submission, which is written specifically to support the TEF process.

Some of the technical elements shown in the diagram are described briefly here:

* **Independent Panel** – TEF awards are judged by an independent panel of assessors, including students, academics (experts in teaching and learning) and experts in employment and widening participation.
* **Metrics** – These are measures deriving from national surveys and data returns, which are a key part of the evidence used in TEF assessments.
* **Split metrics** – Each metric is split out into sub categories to show how a provider performs with respect to different student groups (for example, age, ethnicity, educational disadvantage etc) and/or in different years.
* **Benchmarking** – This is used to allow meaningful interpretation of a provider’s metrics by taking into account the mix of students and subjects taught at that provider. The benchmark is a weighted sector average where weightings are based on the characteristics of the students at the provider. The benchmarking factors currently accounted for in TEF are subject of study, entry qualifications, age, ethnicity, sex, disability, educational disadvantage, qualification level and the year of data used.
* **Very high and low absolute values** – Absolute performance is marked in the metrics based on the top and bottom 10 per cent of providers for that metric.

For more information about TEF, please see:

* The Office for Students’ (OfS) [What is the TEF?](https://www.officeforstudents.org.uk/advice-and-guidance/teaching/what-is-the-tef/) page for a brief overview of TEF
* OfS’ [TEF information](https://www.officeforstudents.org.uk/advice-and-guidance/teaching) pages for detailed information and technical documents
* The Department for Education’s (DfE)’s [TEF page](https://www.gov.uk/government/collections/teaching-excellence-framework), including the [TEF specification](https://www.gov.uk/government/publications/teaching-excellence-and-student-outcomes-framework-specification).

##### Figure 1: The TEF process and evidence base

#### The TEF focuses on three aspects of quality

**Teaching Quality (TQ)**

**Learning Environment (LE)**

**Student Outcomes and Learning Gain (SO)**

#### There are 11 criteria mapped to these three aspects

* Student engagement with learning (TQ1)
* Valuing teaching (TQ2)
* Rigour and stretch (TQ3)
* Assessment and feedback (TQ4)
* *Student partnership (TQ5) 1*
* Resources (LE1)
* Scholarship, research and professional practice (LE2)
* Personalised learning (LE3)
* Employability and transferable skills (SO1)
* Employment and further study (SO2)
* Positive outcomes for all (SO3)

#### A three-step assessment process is undertaken by an independent panel

**Step 1: metrics based initial hypothesis**

Quantitative evidence (a set of standard metrics and data) is considered by assessors to form an initial hypothesis of the rating of Gold, Silver or Bronze. This evidence includes:

 Contextual data about the location, size and student cohort at the provider and/or subject

**Core metrics** (produced by the OfS)

|  |  |  |
| --- | --- | --- |
| * Teaching on my course - National Student Survey (NSS)
* Assessment and feedback (NSS)
* *Student voice (NSS)1*
 | * Academic support (NSS)
* *Learning resources (NSS)1*
* Continuation - Higher Education Statistics Agency / Individualised Learner Record data
 | * Employment or further study - Destination of leavers from higher education (DLHE)2
* Highly skilled employment or

*higher1* further study (DLHE)2* Sustained employment - Longitudinal Education Outcomes (LEO)2
* Above median earnings or

*higher1* further study (LEO)2 |
| Benchmarking, Very High and Very Low Absolute Values and Split metrics are used to highlight positive and negative performance against the core metrics. |

**Supplementary data** (produced by the OfS)

* In the subject-level pilots: grade inflation data and data on differential degree attainment by student background are being tested (at provider-level only)
* For provider-level TEF: grade inflation data and the two LEO-based metrics are considered as supplementary evidence (in step 2 alongside the submission)

1 *New elements being tested in the subject-level pilot* 2 The subject pilot is testing the two LEO metrics as Core metrics, and omits Employment or further study. Provider-level TEF uses only the two DLHE metrics as Core metrics.

**Step 2: additional evidence to test initial hypothesis**

**Submission** – a document written by the provider, with student involvement, that includes additional evidence (qualitative and/or quantitative) against the criteria, is considered.

 **Step 3: holistic judgement**

Assessors review all evidence and make a best-fit judgement against the rating descriptors.

#### The outcome is one of these ratings and a statement of findings

   \*

**\*** given to providers that meet national quality requirements, but do not yet have sufficient data to be fully assessed

# How well does TEF work?

### Terms of Reference

### 1: The process by which ratings are determined under the scheme and the sources of statistical information used in that process

### 2: Whether that process, and those sources of statistical information, are fit for use for the purpose of determining ratings under the scheme

An independent expert view of the statistical information used in TEF will be commissioned separately, but we would also like your views on the following questions.

As referred to in the TEF overview (previous section), TEF is being delivered at both provider-level and subject-level. We are interested in views on both. Please make clear which level you are referring to in your answers to each question.

1. Are the criteria used in TEF (see Figure 1 for a list of the criteria) appropriate?

If not, what criteria would be more appropriate?

**QSN response**:

The criteria represent a set of proxies that serve to approximate, rather than measure, high quality teaching. A more appropriate term instead of ‘teaching quality’ would be a framework for ‘learning and teaching’ in order to reflect the broader scope of the criteria, which includes the learning environment.

1. 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”.
	1. 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)?

**QSN response**:

Teaching excellence needs to be properly defined before proceeding with the extension of the process to subject-level.

The current metrics, and the weightings applied to them in the initial hypothesis, result in a skewed assessment. This is due to the emphasis given to earnings data and continuation rates, which are only indirectly related to the quality of teaching, at the expense of the teaching quality metrics (i.e. NSS results), which have had their weightings downgraded. Continuation, to use as an example of an indirect relationship with teaching quality, is reported to HESA in terms of the reasons for student withdrawal and non-completion and this covers factors such as financial problems, socio-economic background and a lack of a

tradition of higher education in a student’s background. It should not, therefore, be used as a

proxy for teaching quality.

Furthermore, making use of LEO data in the TEF is flawed as the data excludes those working overseas and does not factor-in differences in regional economies.

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

**QSN response**:

As above, ‘teaching excellence’ requires defining and we would suggest a re-doubling of efforts to find appropriate measures of learning gain. This could be used alongside information relating to pedagogy, such as teaching qualifications and membership of professional organisations, engagement in continued professional development and contributions to pedagogic outputs such as journals and conferences.

Could some consideration be given to the student experience of learning and teaching prior to the students’ final year of study?

1. 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).
	1. Should the metrics be benchmarked to allow for difference in a provider’s student population?

**QSN response**:

Yes – indeed the benchmarking should be applied across the basket of metrics to include LEO data as well.

* 1. Does TEF benchmark for the right factors?

**QSN response**: Yes

1. The TEF process uses both quantitative evidence (for example, the core metrics) and qualitative evidence (for example, the written submission).
	1. What are your views about the balance of quantitative and qualitative evidence considered in arriving at ratings?

**QSN response**:

The process of arriving at the final judgements in the previous provider-level TEF exercises

appeared to be appropriately balanced. It is important to retain the role of the written submission in providing valuable context to the metrics and determining the final award outcomes.

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

**QSN response**:

The introduction of TEF at subject-level brings about a significant burden on providers, particularly if the model being trialled this year, with written submissions required for every subject group, is used in the final model. It is also worth noting the cost to the overall TEF assessment process with additional panels required to undertake assessments.

# Are the ratings right?

### Terms of Reference 3: The names of the ratings under the scheme and whether those names are appropriate

There are currently three ratings – Gold, Silver and Bronze – plus an additional Provisional award, given to participating providers that meet national quality requirements, but do not yet have sufficient data to be fully assessed. These are shown below.



We will be separately investigating the needs of applicants and employers as well as the international impact of the scheme and the ratings, but we would also like your views on the following questions.

1. Are the purpose(s) of TEF met by:
	1. awarding a single rating?

**QSN response**:

A single rating or outcome is the most appropriate model.

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

**QSN response**:

Three levels of differentiation is arguably too few, as it fails to recognise the range of providers in the sector. The default award, Bronze, becomes something of a repository for a range of outcomes; from providers that do not meet the criteria for the higher awards to

those with inadequate performance.

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

**QSN response**:

The Gold-Silver-Bronze ratings are reductionist and suggest a competitive approach to teaching excellence, which is inappropriate. These ratings sit uneasily with the benchmarked nature of the judgement process. They also mask quite different performances relating to the three key aspects – teaching quality, learning environment and student outcomes and learning gain.

Please explain your answers.

**QSN response**:

1. If you answered no, what alternatives you would suggest:
	1. For provider-level TEF?

**QSN response**:

Instead of making judgements on providers, focus could instead be given to improving the information available to applicants on the Unistats website and on allocating funding to teaching enhancement projects. The latter could be contingent on cross-sector sharing and collaboration with the aim of driving enhancement in teaching practices and the student experience.

* 1. For subject-level TEF?

**QSN response**:

In addition to the comment above, extending Unistats to incorporate relevant datasets at subject-level would be a means of improving the information for applicants.

* 1. 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.

**QSN response**: n/a

# Has TEF changed anything?

### Terms of Reference 4: The impact of the scheme on the ability of higher education providers to which the scheme applies to carry out their functions (including in particular their functions relating to teaching and research)

The review will consider the recently published [Evaluation of Provider-level TEF 2016-17](https://www.gov.uk/government/publications/evaluation-of-provider-level-tef-2016-to-2017-year-2) [(Year 2)](https://www.gov.uk/government/publications/evaluation-of-provider-level-tef-2016-to-2017-year-2) as well as other available evidence, but we are also interested in your thoughts.

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

If yes, how?

**QSN response**:

As a sector representative body we have not collated any evidence of change in the educational experience of students.

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

If yes, how?

**QSN response**: As above

1. Has the introduction of TEF impacted **positively** on research and/or knowledge transfer?

If yes, how?

**QSN response**: As above

1. Has the introduction of TEF impacted **negatively** on research and/or knowledge transfer?

If yes, how?

**QSN response**: As above

# Is TEF worth it?

### Terms of Reference 5: An assessment of whether the scheme is in the public interest

We are interested to assess whether the scheme provides outputs that are in the public interest and arrives at these outputs in a cost effective way that meets public interest principles.

The review intends to consider research about the costs and benefits of provider and subject level TEF, but we are also interested in your views of the range of benefits, and costs, of the scheme to individuals, institutions and society.

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

**QSN response**:

The TEF has provided some additional coverage of the importance of high quality teaching and the excellent practice that can be found across the sector.

1. Explaining your reasoning, what are the most significant **costs** of:
	1. Provider-level TEF?

**QSN response**:

Due to its prominence in the national media providers may invest resources in the assessment exercise itself rather than in the enhancement of practices; for example, in data systems and analysts. There are also significant costs in respect of staff time; analysing metrics, discussing, drafting and editing written submissions; and collating supporting evidence.

* 1. Subject-level TEF?

**QSN response**:

In addition to the comments above, the expansion of the exercise to subject-level will result in an associated expansion in the staff time dedicated to producing written submissions and in the number of assessors and panels to run the process. This could be at the expense of enhancement activities aimed directly at improving the student experience.

1. Explaining your reasoning, what are the most significant **benefits** of:
	1. Provider-level TEF?

**QSN response**:

As previously mentioned, TEF has provided some additional coverage of the importance of

high quality teaching and the excellent practice that can be found across the sector.

* 1. Subject-level TEF?

**QSN response**:

A possible benefit is in the provision of information more relevant to a student’s course, although it is currently speculative until the process is operational.

# Is TEF fair?

### Terms of Reference 6: Any other matters that the appointed person considers relevant

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.
1. Are there particular types of students, provision or providers that are **disadvantaged**

by the current design of TEF, in a disproportionate way?

**QSN response**:

TEF disadvantages providers with smaller cohort sizes, as the judgements are being made on less rigorous representative sample sizes, which are vulnerable to greater variation.

Providers with a limited portfolio of subjects in certain areas may also be disadvantaged by the lack of benchmarking applied to the LEO data; for instance, courses linked to public sector professions, such as nursing or teaching.

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

**QSN response**:

As previously mentioned, reconsider the use of LEO data.

1. Are there particular types of students, provision or providers that are **advantaged** by the current design of TEF, in a disproportionate way?

**QSN response**: None

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

**QSN response**: n/a

Thank you very much for your helpful comments on all parts of this call for views.

You can keep up to date with the review at the GOV.UK [review page](https://www.gov.uk/government/groups/teaching-excellence-framework-independent-review). We will share the outcomes of this call for views when the review reports in summer 2019.

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