

## Introduction

### i What is your name?

**Name:**

Dr Malcolm Edwards

### ii What is your email address?

**Email:**

malcolm.edwards@imperial.ac.uk

### iii I am a:

Publically funded higher education provider

**Please state:**

### iv If applicable, what is your organisation's name?

**Organisation:**

Imperial College London

### v Would you like us to keep your responses confidential?

No

**Reason for confidentiality:**

## Subject classification system

### 1 To define 'subjects' in subject-level TEF, do you:

Yes - agree

### If you answered No, what other systems could be used and why?:

Yes

### If you answered Yes, please explain why.:

The College agrees with using the CAH2 for subject level TEF. As the Department for Education and the Office for Students will be aware, the CAH2 classification system was designed prior to subject level TEF, and so for a different purpose. It will be important, therefore, to keep the fitness for purpose of the CAH2 under regular review with the sector.

We do think that there are subjects which require further consideration:

The CAH2 subject 'subjects allied to medicine' covers a wide range of very distinct subjects. The College's medical biosciences programmes are mapped to this subject, as are a range of programmes available at other providers (for example physiotherapy and optometry). This does not seem an appropriate aggregation of any of the subjects mapped to this CAH2 as the subjects are very different from one another and so are the destinations for students studying these subjects. It is also difficult to see how assessors for 'subjects allied to medicine' can be representative of the broad range of disciplines. Disaggregating this subject will make the assessment process more robust and will aid students by making clearer which TEF subject their course is aligned to.

We do not propose any further adjustments to the CAH2 subjects.

For Model B, we would propose that the subject group Business and law be disaggregated as the two subjects are very different in terms of students' post-study destinations and the regulatory contexts they operate within.

## Duration of award

### 2 Do you agree that we should have a longer duration and re-application period in subject-level TEF?

Yes - strongly agree

**The focus of this question is on whether we should extend the duration. However, please provide as much detail as you can on your preferred length for the duration and/or re-application period.:**

TEF awards should last for five years and re-application should be permitted after three years. There should be an annual assessment cycle.

A longer award duration and re-application period would be consistent with the fact that more than 12 months' work is required to make real and meaningful change which it is possible to evidence. The more regular of the two options, i.e. a five-year duration with reapplication after 3 years is preferred as most undergraduate programmes last for three or four years and this would help mitigate the risk of the award becoming out of date. The five-year duration would allow for evidence to draw on the experience of an entire cohort of students. It would also bring the TEF cycle in line with that of many accrediting bodies.

## Overview of subject-level TEF design

**3 Should subject-level TEF retain the existing key elements of the provider-level framework (including the 10 TEF criteria, the same suite of metrics, benchmarking, submissions, an independent panel assessment process and the rating system)?**

Yes - agree

**If you answered No, please explain why.:**

Insofar as those elements of the provider-level framework remain appropriate for provider-level assessments they are appropriate for subject-level TEF assessments.

The College recommends that the suitability and fitness for purpose of the elements of the TEF framework (including the metrics) be considered on a regular basis. It also recommends that experimental statistics (such as LEO) do not become part of the core assessment framework until the data is robust, well understood and accepted by the sector.

It is recommended that the provider submission is viewed by the TEF assessors alongside subject submissions. This would reduce the need for providers to duplicate provider-related information in each of the subject submissions, for example, information about central provision for disabled students and careers services, and hence use the full page limit on subject specific material. The provider rating should not be disclosed to avoid any unintended bias on the subject assessment. If it is not possible for the provider submission to be viewed alongside each of the subject submissions, providers should be permitted to enter a brief (1 or 2 pages) contextual statement which makes reference to central provision and initiatives which are relevant across all subjects.

**4 For the design of subject-level TEF, should the Government adopt:**

A 'by exception' approach (ie a form of Model A)

**Please explain your answer. When answering this question, please consider the underlying principles that define Model A (a 'by exception' approach) versus model B (a 'bottom up' approach), and which principle you think we should adopt for subject-level TEF. While we are also interested in detailed comments on the specific design of each model, the final design will likely be a refined version of those presented in the consultation document. This question is therefore seeking views about which underlying approach you prefer. In your response, you may wish to consider the evaluation criteria set out in the specification for the first year of pilots (see below).:**

The College recommends an adapted 'by exception' approach in which the provider submission is viewed alongside each of the subject submissions (see response to Question 3), and which allows for providers to enter an uncapped number of additional, non-exception subjects (see response to Question 5b).

In Model B it would be more difficult to use the written submission to determine a subject rating as subjects are conflated within a group and assessments would as a result rely more heavily on the TEF metrics. It is understood that the metrics used in the TEF were not developed for this purpose and hence a model which can draw on the maximum subject specific evidence in the written submission is preferable. Furthermore, the weaknesses in the metrics raise the importance of the peer-review element of the TEF insofar as this provides a level of expert judgement of the qualitative and quantitative evidence. A model in which subjects are assessed at an individual, rather than group, level would therefore be more appropriate. Furthermore, Model B is more complicated to communicate to students and more widely.

It is important that panel members have deep knowledge of the issues under consideration. Efforts should also be made to ensure that there is not competition between the REF and the TEF over the best academics needed to ensure the peer-review process is as effective and robust as possible.

It is felt that neither Model A nor Model B will provide useful information written for a student audience. This is because the submissions are written for the TEF panel of assessors. Given this, and the potential confusion to students and prospective students as to why some providers do or do not have a submission for a particular subject, we would suggest consideration of publishing TEF subject ratings only, rather than also publishing subject submissions.

## Model A: Generating exceptions

**5 Under Model A, do you agree with the proposed approach for identifying subjects that will be assessed, which would constitute:**

Yes - agree

**If you answered No, please explain why. You may wish to comment on variations or options that we have not mentioned:**

Yes - strongly agree

**Please explain your answer. You may wish to comment on options for identifying the number of additional subjects or on any variations or options that we have not mentioned.:**

The College agrees with this proposal, and recommends that there should not be a cap on the number of additional subjects providers can choose to enter. It is highly unlikely that a provider would submit all of its non-exception subjects. Having no cap would also take account of the fact that the metrics are limited and the

provider has greater understanding of its provision.

## **Model A: Relationship between provider and subject assessment**

### **6 In Model A, should the subject ratings influence the provider rating?**

No - strongly disagree

**Please provide as much detail as you can on why and how this relationship should be brought about.:**

No. Given that Model A assesses subjects by exception it would be inappropriate for the provider rating to be influenced by the ratings of those subjects which are exceptions to the provider's initial hypothesis.

As is stated in the consultation document, such an approach would add an additional level of complexity to the process. It would also make it more difficult to explain to students how the process works and the relationships between the assessments of subjects and providers.

## **Model B: Relationship between provider and subject assessment**

### **7 In Model B, do you agree with the method for how the subject ratings inform the provider-level rating?**

No - disagree

**You may wish to comment on the method for calculating the subject-based initial hypothesis, as well as how this is used in the assessment process. We also welcome alternative approaches that do not use the subject-based initial hypothesis.:**

We do not support Model B.

The method for the subject ratings informing the provider level rating is complex and hence complicated to explain to those who do not have an expert knowledge of the TEF. It will be confusing to prospective students who are the target audience. As explained in our response to Question 4, the TEF assessors will most likely need to rely more heavily on the TEF metrics in determining the subject ratings, and hence the provider rating would too under this method.

## **Metrics**

### **8 Do you agree that grade inflation should only apply in the provider-level metrics?**

Not Answered

**If you are able, please provide information about how grade boundaries are set within institutions to inform whether our rationale applies consistently across the sector. Comments on the potential impacts of applying grade inflation only at provider-level are also welcome.:**

We have not selected a response above as we do not support the inclusion of grade inflation at provider or subject level.

While the recommendation that this should not apply to subject-level metrics is welcomed, the College does not believe that an increase in the award of first and upper-second class degrees is indicative of grade inflation. It instead represents improvements which would be expected as result of adopting effective pedagogies. We therefore recommend that it is not included in the TEF at provider or subject level.

Our Learning and Teaching Strategy includes a commitment to the development of active learning, which has been demonstrated to produce better learning outcomes for students. The College is working to transform its educational provision to provide students with the knowledge and skills they will require for life beyond their degree programmes. It is also working to ensure that students and staff can perform to the best of their abilities irrespective of their gender, ethnicity, sexual orientation, cultural and socio-economic background or disability. On the basis of this the College would not wish for its efforts to teach in ways which allow all students to fulfil their full potential to be treated as a negative indicator in the TEF.

The College awards classifications on the basis of achievement of the relevant assessment criteria. Degree classifications are not norm referenced across a cohort of students.

### **9 What are your views on how we are approaching potential differences in the distribution of subject ratings?**

**You may wish to comment on our approach to very high and low absolute values, clustered metrics and regulation by Professional, Statutory and Regulatory Bodies (PSRBs):**

The College is supportive of the proposal that subject ratings vary naturally for each subject, rather than there being a forced uniform distribution.

A fixed distribution would appear counterintuitive given the aim of the TEF to improve teaching. If teaching improves it would be expected that more institutions are graded at the higher ratings. Subjects should be judged against the defined criteria and receive the appropriate rating.

A fixed distribution would not aid students in making subject choices between providers where they are comparing different subjects.

### **10 To address the issue of non-reportable metrics:**

No - strongly disagree

**If you answered No, please explain why.:**

Please see response to Question 10b.

follow an alternative approach (please specify)?

**Please explain your answer.:**

We do not support the use of either group or provider level metrics where subject level metrics are non-reportable or suppressed. The substituted metrics either at group or provider level may be unrepresentative of the subjects with non-reportable or suppressed metrics. As a result, subject ratings risk being influenced by the performance of other subjects. This would impact the reliability of the TEF award and could mislead students and applicants. If providers have a choice over whether group or provider metrics are used this could introduce game-play into the process.

Instead we recommend no TEF rating be applied where the full subject level metrics are not available. The way this is communicated to prospective students would need careful consideration so as to not imply anything unintended about the quality of the teaching or student outcomes.

We would like to draw to your attention the fact that non-reportable metrics can result from insufficient data to produce a benchmark (e.g. where there is not at least 50% coverage of each factor, such as ethnicity) rather than an indicator not being present (e.g. where there are too few students in the sample).

## **Additional Evidence**

### **11 Do you:**

Yes - strongly agree

**If you answered No, please explain why.:**

Yes. This information should remain voluntary.

Most accrediting bodies require a whole student cohort to complete a programme before it can be accredited. If it was mandatory to declare whether courses were accredited as part of the TEF, new courses may appear less well regarded if there is not yet sufficient evidence for them to be accredited (and it is intended for them to be accredited once a whole cohort have completed them).

No

**Please outline which subjects should have mandatory declaration and why.:**

As is stated in the consultation document, there are differences in the nature and reasons for PSRB accreditations across subjects. It would therefore be difficult to determine which subjects should have a mandatory PSRB declaration.

There are a small number of subjects for which PSRB accreditation is essential (e.g. in order to meet requirements of fitness to practice). Of the subjects offered by the College, this applies only to Medicine. In these cases, it would offer no advantage to the process or to students if there was a mandatory declaration of accreditation given that the course needs to be accredited to operate. We do however believe that there should be suitable measures in place, either through the TEF itself or through other mechanisms, to ensure that only those Medicine programmes registered with the GMC are eligible to be assessed as part of the Medicine subject in the TEF.

In most other disciplines, the advantages of accreditation can be seen through other measures (such as employment outcomes). There are also some advantages of not seeking PSRB accreditation for a course in certain circumstances where accreditation is not essential for students' development (such as allowing providers greater flexibility in the content, structure and assessment).

## **Interdisciplinarity**

### **12 Do you agree with our approach to capturing interdisciplinary provision (in particular, joint and multi-subject combined courses)?**

Yes - agree

**Please explain your answer. We want to ensure that providers are not discouraged from taking an interdisciplinary approach as an unintended consequence of subject-level TEF. We therefore welcome feedback on how the proposed approach will impact on providers and students.:**

It would be disproportionate for there to be specific assessment of joint and multi-subject combined courses. Provided that it is clear to students interested in these courses that they need to consult the TEF ratings of each of the subjects making up a course this would be a reasonable approach. This notwithstanding, there may be a need for an alternative for other forms of interdisciplinary subjects.

## **Teaching Intensity**

### **13 On balance, are you in favour of introducing a measure of teaching intensity in the TEF, and what might be the positive impacts or unintended consequences of implementing a measure of teaching intensity?**

No - strongly disagree

**Please explain your answer.:**

No, we do not support a measure of teaching intensity in the TEF, in any form.

The introduction of a teaching intensity measure would create additional burden without providing any additional assessment of the quality of the teaching being covered. There is no standardised system in place across institutions to ensure that any measurements of teaching intensity are truly comparable. The approach of rating teaching hours by the seniority of the person delivering the teaching would be unhelpful as there is no correlation between the seniority of the teacher and the quality of the teaching. The same would be true of rating teaching hours by the group size.

There is a risk that focus on teaching intensity may discourage institutions from making pedagogically sound changes to the way their courses are delivered. For example, if a provider were to seek to make their students' workloads more manageable by rebalancing their teaching intensity this could lead to a lower Gross Teaching Quotient (GTQ) figure which would appear negative.

It is unclear what additional information a teaching intensity measure would offer students as part of the TEF process. Indications of teaching and personal study time would be better presented through a different means, such as the KIS. The GTQ provides only a single number which carries no direct meaning for students and applicants.

The use of a student survey to measure teaching intensity could be problematic. A high level of responses would be needed for the data to be reliable, and even then the responses may not accurately reflect the true level of provision. It would be better to focus the aim of student surveys on making meaningful improvements to the overall learning experience.

**14 What forms of contact and learning (e.g. lectures, seminars, work-based learning) should and should not be included in a measure of teaching intensity?**

**Question 14:**

Not applicable. Please see answer to Question 13.

**15 What method(s)/option(s) do you think are best to measure teaching intensity? Please state if there are any options that you strongly oppose, and suggest any alternative options.**

**Question 15:**

Not applicable. Please see answer to Question 13.

**Other comments**

**16 Do you have any comments on the design of subject-level TEF that are not captured in your response to the preceding questions in this consultation?**

**Question 16:**

Imperial College London welcomes the opportunity to comment on the proposals outlined in the TEF subject level consultation. In doing so we have drawn upon our experience of being a pilot institution for Model A (the 'by exception' model). We are committed to providing prospective students with the information they need to make informed decisions about their choice of provider and course. We also understand the need to ensure the cost of subject level TEF is proportionate and that value for money is provided to the sector and the taxpayer. We have taken all of this into account in developing our consultation response.