

## **Draft response to the OfS consultation on the Teaching Excellence Framework**

### **Clarity of the proposals**

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

Given the wealth and diversity of evidence that providers could cite for Educational Gains, we would encourage the panel to be open-minded when considering submissions and be receptive to a range of types of evidence.

Showing the data by level of study is useful given the different experiences between undergraduate and postgraduate students. However, the split between First Degree and Undergraduate with Postgraduate components as currently defined in the proposals is less useful. The College offers a number of integrated masters programmes that have a three year first degree alternative and allows students to transfer between the masters and the first degree courses meaning the lived experience of these “two groups” is very similar. Combining these groups would reduce the number of metrics included without compromising our understanding of the student population.

### **Regulatory burden**

**In your view, are there ways in which the policy intention (see the box 'The purpose of the TEF' on page 12) could be delivered more efficiently or effectively than proposed here?**

The College considers the TEF to be an effective method for making universities reflect on their key performance metrics and bringing split metrics into consideration. The TEF incentivises providers not to tolerate pockets of underperformance but not necessarily incentivise excellence.

One of the purposes of the TEF is described as providing an effective method to support student choice. As evidenced by the research carried out in support of the independent review of the TEF, the College believes that individual measures – such as teaching quality and modules on offer at an institution – are effective methods to support students in their choice of provider. Condensing these measures into a single TEF rating to inform student choice appears flawed, as the importance of each metric will vary for different students. Also, to appreciate fully the TEF ratings an understanding of the underlying metrics and assessment process is needed, students are unlikely to have this themselves or a support network which can provide this. The purpose of informing student choice is already delivered effectively via resources such as Discover Uni, which is accessible, easily understood and includes context for the statistics quoted.

**Question 1 To what extent do you agree with our proposal for provider-level, periodic ratings? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

### **Strongly agree**

The College agrees with this proposal, and considers that subject-level ratings would not be proportionate. The four-year duration allows for the fact that more than 12 months' work is

required to make a real and meaningful change which it is possible to evidence, but should also mitigate the risk of the award becoming out of date, given that most undergraduate programmes last for three or four years.

**Question 2 To what extent do you agree with our proposal for aspects and features of assessment? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Tend to agree**

Given the wealth and diversity of evidence that providers could cite for Educational Gains, we would encourage the panel to be open-minded when considering submissions and be receptive to a range of types of evidence. The College would welcome the suggestion from the OfS Webinar that – for this iteration of TEF – credit is given for describing what is being put in place to improve and measure Educational Gain, rather than solely outcomes.

**Question 3 To what extent do you agree with our proposal for the rating scheme? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Tend to agree**

The College is supportive of the decision to continue with Bronze, Silver and Gold for the ratings scheme.

**Question 4 To what extent do you agree with our proposal for where there is an absence of excellence? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Strongly disagree**

The College would contend that 'Requires Improvement' is a misnomer, as it suggests a provider may not be meeting baseline standards, which is not the purpose of the TEF. 'Unclassified' is a more appropriate term where there is an absence of excellence.

**Question 5 To what extent do you agree with our proposal for provider eligibility? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Strongly agree**

The College agrees with the principle of tying the TEF to baseline quality standards and restricting eligibility to institutions that meet these standards. The College also agrees that it would be disproportionate to require providers with fewer than 500 students to participate.

**Question 6 To what extent do you agree with our proposal for courses in scope? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Strongly agree**

The College strongly agrees that the TEF should apply to undergraduate courses only. These should include four-year integrated master's courses. As set out in the consultation, it is also important that there is consistency across the TEF and other regulatory measures in how intercalating students are treated.

**Question 7 To what extent do you agree with our proposal for provider submissions? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Strongly agree**

The College believes it is correct – as in the REF – that evaluations of quality should be based on a mixture of metrics and peer review. The College also supports the principle of a high-level template to aid comparability, and the limit of 20 pages.

**Question 8 To what extent do you agree with our proposal for student submissions? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Strongly agree**

The College is very supportive of the decision to give students the opportunity for a stronger voice in the TEF process. Clear guidance for students in writing their submission and understanding the underlying metrics will be essential.

**Question 9 To what extent do you agree with our proposal for indicators? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Tend to agree**

The College welcomes the proposed treatment of high benchmarks for continuation, as this does not penalise those with high continuation rates, but would suggest that this should apply to other metrics also – the College has benchmarks of 95% or higher within progression and both measures

of completion, and contributes over half the benchmark for some splits with a benchmark of this level.

The College welcomes the use of the Graduate Outcomes Survey to measure progression over Longitudinal Educational Outcomes data, given the inherent flaws in the latter.

The College is supportive of the suppression rules that will be used in the exercise where there are low response rates and denominators.

**Question 10 To what extent do you agree with our proposal for expert review? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

### **Strongly agree**

The College welcomes the use of smaller, expert panels to review submissions, and is keen to see clear guidance and training for TEF panel members on both assessing submissions and interpreting the metrics. With more emphasis on the written submission this will be critical to ensure consistency and to be able to distinguish between Outstanding and Very high quality provision.

**Question 11 To what extent do you agree with our proposal for the assessment of evidence? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

### **Strongly agree**

The College is in agreement that indicators should not form more than half the evidence of excellence, as this will allow institutions to articulate in their written submissions how they support their particular intake of students. A mix of metrics and peer review in assessing the TEF is appropriate.

The College is supportive of the removal of the initial hypothesis – the new approach utilising levels of confidence addresses the concerns raised with the previous iteration by the Royal Statistical Society.

**Question 12 To what extent do you agree with our proposal for published information? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

### **Strongly disagree**

The College believes that all ratings should be provided at the same time, and as such disagrees with the principle of a delay in publishing ratings for providers who make representations about their award. The OfS have suggested that in these circumstances, it will either be communicated that a

provider's award is pending, or not communicate that a provider has participated in the TEF until its outcome has been published. The College considers that either of these options risks a negative impact on providers' reputations and therefore creating pressure on providers to choose not to make representations, particularly the latter option, given that participation in TEF is contingent on meeting baseline requirements.

**Question 13 To what extent do you agree with our proposal for the communication of ratings by providers? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

### **Strongly agree**

The College supports the principle that providers should be able to publish their TEF ratings, and that providers should publish their full rating in each instance (i.e. for each aspect as well as the overall rating), with the date of award included.

**Question 14 To what extent do you agree with our proposal for the name of the scheme? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

### **Tend to agree**

The College agrees that the name of the scheme does not need to include every aspect of what it is trying to assess, and supports the return to the name Teaching Excellence Framework.

**Question 15 To what extent do you agree with our proposal for the timing of the next exercise? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view**

### **Strongly disagree**

The College would strongly recommend that there is a longer gap between publication of guidance and indicators and the submission window closing. The current plan for a September start will result in additional pressure on providers at the start of the academic year, and will also very likely require working with a new student union team to support the Student Submission. The outcomes will be in place for four years, so it will be important to allow the appropriate amount of time for the process.

It would be valuable to have the most recent data possible included in the exercise. If the intention is to reduce burden on institutions, it would be valuable for the OfS to incorporate the 2021-22 HESA return into the metrics for the next TEF assessment cycle. The submission process could then begin once those metrics are available.

With the Access and Participation Plan looking at much of the same datasets, it would be very unhelpful if the two exercises happened at the same time, particularly given both are on four-year cycles.