



Teaching Excellence Framework Technical Consultation – Response Form

Name/Organisation: Imperial College London

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 checked="" 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 type="checkbox"/>	Other (please describe)

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.

The Minister for Universities and Science recently expressed the need for the “REF and the TEF to be mutually reinforcing”, further noting that providers will be asked “to consider how they promote research-led teaching in their TEF submissions”¹. This is not, however, fully captured in the proposed set of criteria. The extent to which research-led teaching forms part of the curriculum should, therefore, be an additional criterion under the Teaching Quality aspect. This could be evidenced, for example, by demonstrating how the curriculum is: (a) enriched by the incorporation of the latest research in the field; and/or (b) provides students learning techniques in the laboratory/through fieldwork with a broader understanding of how those techniques are applied in cutting-edge research. This metric would be complementary but distinct from the proposed Learning Environment criterion to assess the extent to which the environment is enriched by linkages between teaching and scholarship, research and professional practice, which the College agrees could be assessed by evidence such as the involvement of staff who teach in research and the involvement of students in real research projects.

The consultation notes that “the TEF will not be looking for evidence of the fundamental quality expectations and processes that are assessed during the QA process”. However, the criterion to assess the extent to which course design, development, standards and assessment are effective is likely to duplicate the QA assessment process. Given that it is not possible to assess this criterion through the core metrics, such duplication will result in unnecessary burden if providers are required to repeat QA assessment information in their additional evidence submissions. More guidance should be provided to both assessors and providers on what distinguishes this criterion from the TEF’s baseline quality requirements of the QA assessment process. Furthermore, it does not seem logical that beyond Year 2 of the TEF, providers who enter into the full assessment process having met these baseline requirements but do not achieve the minimum award are not classified as meeting expectations. The College has provided further comments in relation to this in response to Question 12.

While the remaining criteria proposed seem broadly reasonable, the College is concerned by some of the associated evidence and has provided specific comments on this in response to Question 8.

Question 2 (Chapter 3)

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

A highly skilled employment metric should be included as a core metric within the Student Outcomes and Learning Gain quality aspect, weighted above the overall employment metric. The College agrees that at present the Office for National Statistics (ONS) Standard Occupational Classification (SOC) groups 1-3 is the best available framework to identify highly skilled employment and supports its use in Year Two of the TEF. In the future it will be important that this metric is aligned with the ongoing development of data on graduate

¹ https://www.gov.uk/government/speeches/the-student-journey-from-teenage-to-middle-age?mc_cid=8755cbb306&mc_eid=1021fc385b

outcomes and destinations which is currently being led by HESA², and the review of the SOC framework by the ONS.

A provider's ability to provide students with the skills and knowledge required to progress to further study should also be considered in this context. Progression to further study, and particularly to higher research degrees should, therefore, be viewed as of equal standing to gaining highly skilled employment and included within this metric as a positive outcome.

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.

Question 3 (Chapter 3)

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

Yes No Not sure

The data and methodology used must be open so that providers can recalculate their benchmarks in order to understand their performance. The benchmarking approach must be sufficiently robust and fair so that it commands the confidence of the sector. The College does not view the current approach for setting benchmarks to be transparent or accessible enough for providers or students to usefully interpret the basis on which assessments have been made.

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.

There is a substantial difference between measuring significance using a 1.96 sigma method compared to a three sigma method. Under a 1.96 sigma method it can be expected that one in 20 differences flagged as significant will be a false positive, as opposed to less than three in 1000 under a three sigma procedure³. Given that the proposals indicate that there will be more than 20 metrics per provider once the split by characteristics is taken into account, this implies that at least one metric per provider could be falsely flagged. The interim report from the ONS on their review of the data sources for the TEF acknowledges that the

² <https://www.hesa.ac.uk/content/view/3797>

³ The College has sought expert statistical advice from its Mathematics department.

“methodology for creating benchmarks, comparing to individual providers’ performance assessing statistical significance is an important element [of the TEF] and is part of a fundamental review of the UKPI’s benchmarking approach”⁴. It would therefore be inappropriate to change the approach to flagging statistical significance to a 1.96 sigma method purely on the basis that this “will provide greater differentiation between providers” since neither HEFCE’s fundamental review of the benchmarking approach has taken place nor has the ONS published its review of the benchmarks, and the likelihood of a false flag is so greatly increased. The College would, therefore, recommend using a three sigma method.

Consideration should be taken when comparing outcomes by different characteristic groups. A provider whose disadvantaged students achieve excellent outcomes should be given credit even if the provider’s non-disadvantaged students achieve slightly better outcomes. It would otherwise presumably be possible for a provider to perform better in the TEF if the outcomes of its non-disadvantaged students dropped to the level of the outcomes of its disadvantaged students, despite in reality this being a drop in performance. Likewise, scores for a provider whose disadvantaged students have outcomes similar to or better than its non-disadvantaged students should not automatically be considered as “positive” if those outcomes are objectively poor.

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.

Overall, the College supports the proposals to average TEF metrics over the most recent three years of available data; however, assessors should be aware that this may result in a delay in the visibility of provider improvements within the three year period. Given that significance flags will be reported for individual years, it would be sensible for the metrics by year to also be made available to assessors for context. It should also be noted that each metric will relate to different cohorts (for example, student satisfaction data will cover final year students in the academic years 2013-14 to 2015-16, while graduate outcomes data will cover final year students in the academic years 2012-13 to 2014-15) and therefore provider improvements may not be reflected in all of the metrics .

Longer term, guidance will need to be provided as to how metrics averaged over three years are treated where there has been a change in methodology to the underlying data. For example due to the upcoming changes to the NSS questions in 2017 it may not be appropriate to average the 2017 results with prior years’ data.

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.

⁴ <https://www.gov.uk/government/publications/teaching-excellence-framework-interim-review-of-data-sources> (page 17)

The number of characteristics proposed is likely to lead to a large number of metrics, some of which will be based on low volumes of numbers, and it is unclear what robust conclusions can be made from presenting the metrics in this way. Data should only be presented where volumes are large enough for calculations of statistically significant differences (based on a three sigma approach) to be robust. In particular, statistically significant differences between the different BME groups should only be presented where the difference between the outcome for a specific group and the overall outcome is also statistically significant. The College would support further research on a national scale to establish whether there are underlying factors influencing differential performance of multiple groups, which would yield better analysis.

In any case, it would not be appropriate to use POLAR, which measures progression into higher education, in this context. The use of POLAR quintiles is particularly ineffective in London, where there are a greater proportion of income-deprived children anywhere else in the country (45%) and yet only 4% of the young population live in wards which are in the lowest participation quintile⁵. The HEFCE evaluation of POLAR3⁶ also notes that although there is known to be a correlation between disadvantage in general and a young person's chance of progressing into higher education the correlation is not always strong. In addition to this POLAR is an area-based measure which is not normally used for individual targeting. As a result, some entrants from POLAR quintiles 1 and 2 will have additional indicators of disadvantage, whereas others will not, meaning that students from quintiles 1 and 2 will in many cases be a heterogeneous mix of individuals with different characteristics. Using POLAR as a measure of disadvantage in this context of measuring teaching quality is, therefore, unlikely to be useful or align with a provider's monitoring processes and interventions.

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.

The Government White Paper acknowledges that “the assessment process will not consider access, as this is not a measure of teaching quality”⁷. It is therefore inconsistent with the White Paper to include the contextual information proposed as this implies that access is being taken into consideration. If a benchmarking approach is to be used in the assessment process which would include the characteristics provided in the contextual data and the effect they may have on student outcomes, it is unclear how the duplication of this information will aid assessors in interpreting the common metrics or add value to the assessment process. In any case, as highlighted in our response to Question 5, it would not be appropriate to provide POLAR data in this context..

If such information is to be provided, it should also give a sense of the overall academic community, such as the number of postgraduate students, staff, and the research environment. Given the criterion to assess effective linkages between teaching and research within the Learning Environment aspect, it would seem reasonable if the contextual

⁵ http://www.hefce.ac.uk/media/hefce/content/pubs/2014/201401/HEFCE2014_01.pdf (page 13)

⁶ http://www.hefce.ac.uk/media/hefce/content/pubs/2014/201401/HEFCE2014_01.pdf (page 11)

⁷ <https://www.gov.uk/government/publications/higher-education-success-as-a-knowledge-economy-white-paper> (page 48)

information included an indication of the quality of the research environment, through the REF quality profiles. The quality of the research to which students are exposed should be of a sufficiently high standard and embedded across the entire institution to be deemed as having an outstanding impact on a student's academic experience.

As with the core metrics, any contextual information (both numerical and the data maps) should be made available to providers to review in advance of the assessment process.

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.

The College is supportive of a page limit for the provider submission as this will help keep responses concise and reduce burden on both providers and TEF assessors. However, TEF assessors and panel members will need to consider the effect of this approach on ensuring a consistent assessment across all providers given that submissions are likely to vary greatly between providers, particularly in relation to how commendations are assessed and awarded. The College would recommend that additional to main evidence submission, providers should nominate themselves for specific commendation areas and provide an additional submission of up to 5 pages per commendation. While this may increase the burden somewhat, it is likely to be the only way of ensuring a fair and credible assessment of the commendations. TEF Assessors would be able to refer to information included in the main provider submission, but would make the majority of the assessment on the commendation submission.

The consultation notes that "copies of, or links to primary evidence [...] should not be included" in the submissions. While the College agrees that this should be the case within the main provider submission, providers should be required as far as possible to reference claims of good practice and provide sources of evidence in the form of a bibliography separate to the main submission. Not only would this reduce the burden on TEF assessors and enable them to easily verify evidence submitted it would reduce the likelihood of submissions containing unsubstantiated claims and prevent the process from becoming a creative writing exercise. Should the TEF assessors have further queries on the evidence submitted, they should raise these directly with the provider as is the case with the REF. As noted in our response to Question 8, it will imperative that evidence is credible, robust and verifiable.

The College agrees that the evidence should demonstrate excellence across the entirety of a provider's provision rather than "highly localised practices that affect a relatively small number of students". However, assessors should acknowledge that there will be examples of excellence that are rightly tailored to a particular department and its students. Providers should, therefore, be able to include examples of more specific practices by department provided they demonstrate how this contributes to the overall teaching and learning strategy. Specific comments relating to appropriate types of evidence are provided in response to Question 8.

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?

While the College agrees that the list of evidence should not be overly exhaustive or prescriptive all evidence should be underpinned by a series of principles, such that it is: (a) genuinely linked to the quality aspect being assessed; (b) credible and robust; and (c) verifiable. As noted in the College's response to Question 7, providers should be required to reference evidence as far as possible in the form of a bibliography. Evidence that does not meet these criteria should not qualify for inclusion within the provider submissions.

Given that the framework is seeking to identify and stimulate "excellence above the baseline", the evidence submission should give greater prominence to positive initiatives and achievements rather than placing a large focus on monitoring and evaluation processes, most of which will have been covered in the QA evaluations. To avoid being prescriptive and allow diversity and innovation to flourish across the sector, the list should avoid single issue examples such as grade inflation, the use of a GPA system, PSRB recognition etc.

The College also has particular reservations regarding the following:

- i. Quantitative information on teaching intensity, such as weighted contact hours: Teaching intensity metrics are often based on time spent studying as measured through the UK Engagement Surveys which often have low response rates and are self-reported by students. Information on time spent studying is not an indicator of teaching excellence alone if there is no context as to how those hours are spent. The notion of "weighted" contact hours is particularly concerning given that there is no agreed sector-wide methodology for calculating such a measure.
- ii. Learning Gain: The consultation notes but does not provide specific examples of learning gain evidence. Crude attempts to measure learning gain, such as claiming that the relationship between entry tariff and degree classification represents "added value", should not be acceptable forms of evidence under this criterion.

The College would recommend that BIS revisit the list of evidence provided in Figure 6 to ensure that it inspires and rewards teaching excellence and innovation. Alternative examples of evidence which the College would suggest include:

- i. Effective use of technology in teaching activities.
- ii. Where relevant to specific subjects, linkages between theoretical, practical and experiential learning.
- iii. Infrastructure to support innovation in learning and teaching.
- iv. Impact and effectiveness of supporting students into postgraduate study/and or research.
- v. Evidence of developing students' experience, skills and capability in undertaking research projects.
- vi. Findings from satisfaction surveys of graduates.
- vii. Evidence of the provision of additional educational activities outside the main curriculum, for example providing students with entrepreneurial opportunities.
- viii. Evidence of embedding internationalisation and cross-cultural collaboration within the student experience.

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.

The College is supportive of the TEF issuing commendations and believes the areas identified are suitable. Specific comments relating to the evidence provided in order to assess commendations are provided in response to Question 7.

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.

While the three stage assessment process seems broadly reasonable, fundamental to the success of the TEF assessments will be complete confidence in the expertise and integrity of the TEF assessors and panel members. It will be important for assessors and panel members to be current and active members of the academic community, who are distinguished and respected peers from institutions which share the values and mission of the institution being judged, and hold relevant expertise in the subject mix and type of provision they are assessing. The confidence which REF outcomes enjoy across the sector derives in large part from trust in the panel members, and similar confidence in TEF outcomes will also require that assessor and panel members are chosen appropriately.

As highlighted in our response to Question 2, employment is not the only positive outcome for a university graduate. Progression to further study, and particularly to higher research degrees, should be viewed as of equal standing to gaining graduate-level employment. From this perspective it would be useful to include academics with research expertise on the assessment panels in order to assess the extent to which a provider effectively produces graduates with the skills and knowledge required to progress to further study and higher research degrees.

Specific comments relating to the assessment of Commendations have been provided in response to Question 7.

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.

The College agrees with this proposal. Specific comments relating to the description of TEF ratings for such providers are provided in response to Question 12.

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.

While the descriptions of the ratings for Excellent and Outstanding seem reasonable, the College does not agree with the rating description of “Meets Expectations”. Assuming that beyond the TEF in Year 2 it will be feasible for a provider to enter into the full assessment process and not be guaranteed the minimum award, it does not seem logical for such a provider, which has met the baseline requirements of the QA assessment, to not be classified as meeting expectations. The College would therefore recommend that there be three ratings (Good, Excellent and Outstanding) linked to the TEF outcomes and the inflationary increases, and a separate Meets Expectations rating reserved for providers who only meet the baseline quality requirements and are not entitled to an inflationary fee increase.

Additionally, a distinction should be made in the description of the ratings between providers who have received an award based on three years of data and those based on fewer years of data. In the long term, as the TEF develops, providers are likely to hold awards based on different criteria and metrics. Therefore the descriptions should also include details of when the award was issued and the version of the TEF it was awarded under, and the period over which it is valid.

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