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12th July, 2016

Adam Gray
Higher Education
Department for Business, Innovation and Skills
Level 5, 1 Victoria Street
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Dear Mr Gray,

Teaching Excellence Framework: year 2 - technical consultation

The Engineering Professors' Council (http://epc.ac.uk) represents the majority of academic engineers in the UK, with 81 university engineering faculty members comprising over 6,500 academic staff. It is a "nominating institution" for the purposes of the Research Excellence Framework (REF) and four panellists from REF2014 sit on its governing Committee, which also numbers a Vice President of the Royal Academy of Engineering, a President of the Institute of Measurement and Control and an immediate past President of the Institution of Civil Engineers, as well as four university's pro Vice-Chancellors.

We enclose our response to the Consultation: Teaching Excellence Framework: year 2 - technical consultation

We would be pleased to elaborate on any on our response if invited to do so.

Yours sincerely

Professor Stephanie Haywood

President

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Department for Business, Innovation & Skills

Teaching Excellence Framework Technical Consultation – Response Form

Name/Organisation: Engineering Professors' Council

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

	Respondent type
☐	Alternative higher education provider (with designated courses)
☐	Alternative higher education provider (no designated courses)
☐	Awarding organisation
☐	Business/Employer
☐	Central government
☐	Charity or social enterprise
☐	Further Education College
☐	Higher Education Institution
☐	Individual (Please describe any particular relevant interest; parent, student, teaching staff etc.)
☐	Legal representative
☐	Local Government
☐	Professional Body
☒	Representative Body
☐	Research Council
☐	Student
☐	Trade Union or staff association
☐	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 criteria proposed in Figure 4 are appropriate but do not always seem well-linked with the proposed comments for panel guidance. For example, it is hard to see that the use of a GPA to record achievement demonstrates that students 'acquire knowledge, skills and attributes that prepare them for their personal and professional lives'. Student satisfaction surveys such as NSS are not an effective measure of whether 'teaching provides effective stimulation and challenge' nor do such surveys show that 'standards and assessment are effective in stretching students to develop knowledge, skills and attributes that reflect their full potential.'

In general, the use of student satisfaction as a hard metric has many risks. It would be possible to improve student satisfaction by reducing the complexity or difficulty of courses, or by giving an undue level of support to students, thereby minimizing independent study (an important skill) and reducing the 'academic challenge'; this could prompt a 'race to the bottom'. Feedback from external examiners and professional accreditation, both of departments and of individual staff, could be useful metrics.

Student progression as a metric also has risks – especially if applied to first year students, given that the largest numbers of failures and withdrawals occur among this group for a variety of both academic and non-academic reasons. This again risks departments simplifying courses or ensuring that assessment patterns guarantee progression for the vast majority of students. Assessment must measure competence and skills developed to avoid this. It would be unfortunate if universities were to be reduced to rote learning and cramming in order to achieve good metrics for retention and high grades that students came to see as a right.

The TEF must also not lose sight of the requirement for students to be seen as active participants. The phrase '... encourages students to engage' does not feel like a strong enough onus on students' roles and responsibilities. Students are paying for an opportunity to study, not the guarantee of a degree.

Peer observation and review of teaching competence as well as a greater onus on documentation of students' views and engagement through class and course representation could be valuable qualitative measures. Course design should recognize the importance of developing basic skills and competencies especially in earlier years, say level 3 through 5 as well as linking teaching with research in later years.

Other quantitative criteria could be added to learning environment such as: amounts of investment in infrastructure and facilities (computing, laboratory equipment, library), student-staff ratio, percentage of staff with teaching qualifications,

percentage of staff with higher academic qualifications, percentage of staff with relevant industrial/business experience.

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.

PhD students should be included as omission could pull down this metric even though they are a premier outcome, which is the case for research intensive disciplines.

If a course is accredited by a professional body, the graduate should be included in any "highly skilled employment" metric. It is virtually impossible to get 100% response to the DHLE survey and this could be a more reliable comparator.

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.

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.

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.

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.

If contextual information is used for scoring this might result in significant subjectivity in the evaluation

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.

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.

Some of these examples are very difficult to measure (e.g. learning gain, effectiveness of external examining or teaching observations schemes), or most likely to be measured twice (e.g. acting on student feedback and NSS).

In addition, some of these examples could bias towards or against different types of institutions - those that focus more on degrees leading to specific professions could have better longer-term employment and highly-skilled employment outcomes. However, this does not necessarily make them better institutions given the need for graduates with a variety of skill sets and backgrounds.

Other examples that could be included, and that are particularly aligned with widening participation, are: Impact of evidence based and evaluated initiatives aimed at closing gaps in - development, attainment and progression for students from different backgrounds, in particular those from disadvantaged backgrounds or those who are at greater risk of not achieving positive outcomes.

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 assessment and recognition of excellence in teaching resource provision can be important to encourage institutions to invest in teaching. It can have potential benefits for UK international recruitment.

Discipline based commendations should be considered to help identify good practice and give evaluation more granularity.

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.

Discipline specific TEF is needed for there to be real value in the process. At institutional level, a broad range of provision is likely to have significant variations within it.

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.

They should not enter the process.

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.

'Excellent' and 'Outstanding' are highly subjective terms that need better definition.

Giving students useful information when applying for a course, beyond that available already, could be a challenge given that the rating will be for an institution as a whole and not addressing specific disciplines.

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