Consultation on the Teaching Excellence Framework (TEF)

About you

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Are you responding as an individual or on behalf of an organisation?
Organisation

What is the name of your organisation? (If not relevant, please answer 'N/A')
Engineering Professors' Council

Which of the following best describes you?
Other (please specify): HE engineering representative body

Questions relating to all proposals

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

It is unclear how the exclusion of HE modules or credit-only courses is commensurate with the current policy thinking around short courses, micro-credentials and the Lifelong Loan Entitlement (LLE). We fear that the overall approach does not adequately accommodate courses which allow students to do anything other than join a course, stay the duration and graduate. Given the Government's intention to expand flexibility throughout the education sector to encourage lifelong learning, modularity and hop-on-hop-off courses, the proposed model of TEF may become obsolete even before it has had a chance to be fully implemented. The changes that LLE is intended to introduce will be a game-changer for the sector and this does not appear to have been given adequate consideration in the proposals.

We are unclear how principles and guidelines that state that the indicators should contribute no more than half the evidence of excellence in each aspect and that the two aspects should be equally weighted when deciding the overall rating will apply in the context of the growing number of specialist Engineering providers, where student outcomes data may not yet be available (or may be suppressed where the proposed statistical uncertainty approach relates to the size of the student population and smaller numbers can lead to greater uncertainty).

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

Spotlighting teaching excellence:

We support the policy intention of spotlighting teaching excellence, however, it is not clear that there is a clear benefit for excellence conferred by TEF that is distinctive from the rewards of excellence of itself. TEF does not significantly impact on student recruitment and for individual academics, existing tools for assessing teaching excellence (eg. HEA fellowship levels, NTFS, NSS, internal processes, etc) are a more significant measure than an institution-wide badge. Indeed, by measuring at an institution-wide level only, pockets of excellence are likely to be overlooked, which may even act to dampen them.

Influencing providers' reputations:

A reputation that accurately reflects reality is a notoriously difficult thing to create and we have concerns that TEF may do so by reducing complexity to a badge. At best, it is optimistic to imagine that a badge contributes significantly to the reputation of an institution. At worst, it is heuristic and over-simplistic. Reputation cannot be reduced to four bands of excellence.

It is more useful to think in terms of establishing a reputation for something. For example, there are Engineering departments around the country with a reputation for excellence in automotive engineering, for industrial collaboration, for innovative pedagogy, for international reach. These reputations depend on far more than can be captured by the new proposals for TEF and none of these reputations is enhanced (or significantly diminished) by an institution-wide badge.

Informing student choice:

It is stated that one of the purposes of the TEF is to inform student choice. Since the TEF's inception, the evidence suggests that few prospective students are aware of the TEF; even fewer profess that it influences their decision-making (see Youth Sight); and it is likely that the number of students for whom it actively drives choice rather than acting as a post hoc rationalisation of choice are vanishingly small.

Part of the problem here is that in order to be specifically informative about choice, the TEF would need to be more granular (ie. at subject level) and less heuristic (ie. information rather than badges), however achieving that would not only be disproportionately more complicated and burdensome to OfS and to HEIs, but it would also make the data less statistically reliable and make the results less heuristically attractive.

That said, many students may take the new 'requires improvement' band as a heuristic indication that the teaching quality is poor, which may or may not be an accurate interpretation of the intended meaning of the band. Those who pay any heed to the TEF will see it as an active disincentive to choosing that institution. There may of course be pockets of excellence within that institution (reflecting the inherent problem above). These parts of the institution will be unfairly and damagingly sullied by such a reputational slur to the whole institution (which is presumably why the OfS has taken steps to protect itself from legal repercussions). We are particularly cautious about the impact of 'marketing' apparently negative metrics on the international market. Higher education in the UK is perceived internationally as one of best provisions in the world.

If it is only this negative band that has any significant impact on informing student choice (and not those which purport to recognise excellence above the baselines), it invites the question whether TEF plays a

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distinct role from OfS's other conditions judgements, especially the B3 baselines. If it does not, it is expensive and burdensome and does not advance the policy intentions. Currently we are unaware of any evidence that TEF in the past has been useful in informing student choice.

Broader points on policy intentions:

This approach is not fit for purpose in the more modular system of higher education presented in current Government thinking for the LLE.

There is an established system of accreditation of Engineering degrees, and degrees accredited by Professional Engineering Institutions licensed by the Engineering Council are recognised internationally through a number of international accords. The accreditation process focuses on assuring that degrees will deliver to at least a threshold standard of learning outcomes specified by the Engineering profession. These learning outcomes are developed and maintained in consultation with employers and all other stakeholders.

Alternatives:

In our response to the Consultation on Regulating Student Outcomes, we have argued that the closest direct measure of teaching quality is to assess learning gain. This can be assessed by assessing students' skills and knowledge on entry to their courses (which also helps to identify learning gaps) and assessing again at the end (as well as interim assessments). This approach takes account of the fact that teaching excellence isn't purely a property of the institution, but of the relationship and engagement between the institution and the students (See G. Gibbs, Dimensions of Quality).

As pilot schemes run by HEFCE showed, assessing learning gain is not as straightforward as we might like, but as the past few years of TEF and the 116 pages of this consultation demonstrate, nor is it straightforward to create a useful TEF. If a job is difficult, it should at least have the benefit of being worthwhile. It would be worthwhile to invest in establishing a Learning Gain Framework that can better serve the policy intentions of TEF and the
Student Outcomes regulation.

The EPC would also welcome an approach which makes better use of existing regulation frameworks (such as Ofsted in relation to degree apprenticeships and accreditation in relation to professional courses), where on the ground evidence of high quality is recognised as a positive indicator without deferring to deficit model proxy measures.
Dismissal of sensible and established regulatory and professional outcomes which already hold providers to account, at subject level, will lead to over-regulation of the highest quality courses in the sector. OfS's approach is a concern in relation to regulation hierarchy; burden on providers to provide such additional information in unstructured context statements, specifically for high-cost subjects; workload and impact on students; and – in engineering especially – the onward impact of international standing.

Questions relating to specific proposals

In EPCs responses to the questions in this consultation, we have specifically considered the potential for any unintended consequences of the proposals engineering providers or students, including the specific characteristics of these cohorts.

Questions relating to specific proposals

Q1. To what extent do you agree with our proposal for provider-level, periodic ratings (proposal 1)? 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 disagree

Comments:
We disagree that an overall rating should be awarded to a provider reflecting the quality of its undergraduate courses as we do not believe that the process measures teaching excellence.

Ultimately, the lack of subject granularity in the TEF renders it meaningless, or worse, actively misleading.

We note that a four-year TEF cycle, coupled with the accreditation timescales in Engineering, is likely to mean that anyone using the rating may be looking at information that is constantly partial, out-of-date and potentially conflicting.

We recognise that a more frequent periodic cycle would be disproportionately burdensome. However, that is not an argument for adopting a periodic cycle that delivers questionably useful results. It is an argument for considering whether the exercise confers sufficient benefits at all. We remain unconvinced and, as stated, believe efforts could be better employed in assessing learning gain.

Q2. To what extent do you agree with our proposal for aspects and features of assessment (proposal 2)? 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

Comments:
While the EPC welcomes the consistency of approach, we are concerned that the limitations and constraints of the two aspects proposed to be assessed and rated – the student experience and student outcomes – and their collection methods compromise the utility of this approach beyond fitness for purpose. The criteria for determining ratings do not necessarily demonstrate very high quality or outstanding teaching.

OfS has not evidenced sufficient grasp of how student factors influence outcomes. Evidence shows that one of the most significant influences is whether students come from an affluent background and that school attainment is a stronger predictor of graduate earnings than subject or university choice. The complexity of student factors is lost in the proposals. EPC research has shown, for example, that BTEC students' social mobility from studying engineering is relatively greater than for their high-achieving A level counterparts.

We regret that the criterion is based on outcomes and not on the value added, which is surely the most direct 'outcome' to which the higher education provided by institutions contributes. The single most important failure of these proposals to properly incorporate a measure of learning gained or value added.

Educational gain is seriously underdeveloped in the proposals, leaving providers to report on the education gain of their students (and, importantly, how this may vary across subjects) with little guidance. While this may be an attempt to keep things simple, the result is to judge providers on one thing by measuring something different. The extensive work completed by HEFCE on 'learning gain' made significant progress and should be revisited as a more promising approach – particularly given that a learning gain-based approach will be more adaptable to short courses, HTQs and stackable courses.

Q3. To what extent do you agree with our proposal for the rating scheme (proposal 3)? 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

Comments:
Reducing a complex and multi-faceted issue like excellence to a three-banded rating – Gold, Silver and Bronze – signifying degrees of excellence above baseline quality requirements is inherently promoting a heuristic approach to student choice. That is to say choice based on supposed signifiers that obstruct informed choice rather than contribute to it. We strongly advise against use of the 'gold', 'silver', 'bronze' grading system from the provider-level TEF as it is inappropriate. Evidence suggests that the main effect of this system is stimulating interest in 'gold' ranked universities (https://www.hotcoursesgroup.com/early-signs-that-tef-rankings-are-impacting-on-international-student-behaviour/). The logical extension of this is that those ranked bronze are tarnished by comparison. Research on students' views on how teaching excellence should be assessed, measured and recognised indicated that half of all students would not have applied, or would have reconsidered applying, to an institution with a Bronze award (https://wonkhe.com/blogs/what-sort-of-tef-do-students-really-want/). The research is based on a survey of 8,994 current students across 123 institutions, weighted for institution and gender, conducted by trendence UK.)

Further research by YouthSight suggests that most applicants had little to no awareness of TEF and that, even among those who were aware of it, did not think it had/would influence their choice of institution. Other research suggests that any influence that TEF may have on choice would only be as a heuristic that supports confirmation bias. For example, an applicant positively considering university X who sees that it is Gold or Silver rated may retrospectively offer that as grounds for their choice, but if the applicant were to see that it is Bronze rated, they would ignore it and perhaps cite some other heuristic such as the employment rate, the league table position or a recommendation from a friend.

In the absence of any evidence that TEF supports and improves informed choice, we must acknowledge the evidence that it may actively harm informed choice by providing a reductive heuristic.

Q4. To what extent do you agree with our proposal for where there is an absence of excellence (proposal 4)? 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

Comments:
This proposal stems from the suggestion in the Pearce Review in response to the unintended consequence of a Bronze rating being taken as negative. The Review proposed a fourth category that indicated that an institution meets requirements. Within the limitations of a heuristic banding system, that seemed a sensible compromise, describing accurately that the provision merely meets requirements but does not excel in any way.

The introduction of a new award category of “requires improvement” where there is an absence of excellence, and no rating is awarded, has a wholly different effect. It can only be extremely damaging unless it is applied very leniently in terms of context. A greater range of outcomes compared with the previous iterations of the TEF will just shortcut some of those institutions previously at the lower end of the Bronze level to ‘really bad’, where this outcome for a provider should be considered as part of general monitoring of quality and standards.

The availability and presentation of the proposed student outcomes data suggests that, in Engineering, the dashboards will provide the confidence students need without the need for TEF. Given that research shows that most students chose subjects, not universities, first (https://www.heacademy.ac.uk/system/files/resources/student_choice.pdf) this is counterintuitive; Engineering at Bronze providers may be world-leading where computer science, say, at a Gold provider may result in poorer student outcomes.

As explained above, even in institutions that ‘require improvement’, there may be pockets of excellence and yet they – and all the staff and students in those excellent departments – will be tarred with the same brush of inadequacy.

The unnecessarily disparaging terminology of ‘requires improvement’ even undermines the Pearce Review’s intention to address the problematic representation of Bronze, because it suggests it is only just above needing improvement, which most people would understand to mean something closer to ‘barely satisfactory’ than to ‘excellent but not as excellent as Silver and Gold’.

Q5. To what extent do you agree with our proposal for provider eligibility (proposal 5)? 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 disagree

Comments:
We note that these proposals may have a specific impact on “non-standard” provision, potentially deterring future partnerships, limiting student choice, and disproportionately impacting upon these smaller, specialist providers.

For example, there are a growing number of specialist Engineering providers, where data for student cohorts of fewer than 23 will be suppressed, particularly at split indicator level.
In addition, as the proposed statistical uncertainty approach in this context typically relates to the size of the student population, smaller numbers lead to greater uncertainty. The EPC would urge OfS to ensure that specialist Engineering providers and providers offering non-traditional models of Engineering HE remain TEF eligible. As discussed elsewhere in these proposals, these not only serve distinct and important societal and economic purposes but are more closely aligned to the Government’s direction of travel regarding stackable, hop-on-hop-off modes of lifelong higher education.

Q6. To what extent do you agree with our proposal for courses in scope (proposal 6)? 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

Comments:
We note that all of a provider’s undergraduate courses, and the students on those courses, should be within the scope of a TEF assessment. However, the partial exclusion of international students from metrics – in particular progression – is likely to lead to an incomplete and potentially inconsistent picture. Approximately one in four students in Engineering is an international student, a higher proportion than in almost any other discipline.

The use of proxies (e.g. outcomes for teaching quality, compound indicators for completion) inevitably leads to gaming. Continuation and completion measures are particularly liable to this given that it is proposed to treat the outcomes of students who have transferred to another course or provider as neutral and also recognise that completion of a lower award than originally intended could still be interpreted as a positive outcome. We welcome that, for Engineering, this does mean that MEng to BEng transfers would be a positive outcome.

At the other end of the study lifecycle, foundation year students will not be separated out from first degree numbers. This will discourage institutions from offering this pathway for access in case students do not progress. This may align with the proposal recommended by the Augar Review that Foundation years should be defunded, but it is at odds with the same review’s call for greater flexibility in the delivery of courses, particularly in the form of hop-on-hop-off models and recognition (through interim qualifications) of each level reached. EPC research suggests that foundation years, particularly if integrated, are an important entry path the Engineering supporting access and diversity. We reject the Augar recommendation and any proposals that may undermine the availability and effectiveness of foundation years.

Q7. To what extent do you agree with our proposal for provider submissions (proposal 7)? 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

Comments:
In the context of “requires improvement” in particular, providers’ evidence of excellence in relation to the experience and outcomes of their students will be essential to identify institutions adding a great deal on the basis of prior attainment (and it will be critical that OfS recognises the importance of such context in its banding decisions). It will also be key for specialist institutions, those delivering local education and regional levelling up.

However, this additional weight to providers’ case for their excellence in their submission will create inequity; smaller universities and specialist providers (those most likely to be RI) will not have the resources for specialist consultants to write these.

We are concerned that, while the use of LEO data has been dropped from the formal metrics, the OfS has shared through consultation events that it expects LEO data to form part of context statements.

Q8. To what extent do you agree with our proposal for student submissions (proposal 8)? 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 disagree

Comments:
While we recognise the value of students’ view of their own experience, most students will lack an objective point of reference for what good teaching at higher education level looks like. Students’ views on the quality of their experience and outcomes are emphatically not equivalent to teaching quality, but rather a reflection of the gap between the student’s expectation and what they perceive to have been delivered.

We recommend that student submissions should be guided in order to deliver objective and comparable insights.

Q9. To what extent do you agree with our proposal for indicators (proposal 9)? 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 disagree

Comments:
We strongly disagree that the OfS should produce numerical indicators based on the National Student Survey (NSS) responses. NSS Students' data is emphatically not equivalent to teaching quality, but rather a reflection of the gap between the student's expectation and what they perceive to have been delivered. This can be seen in the long continual variance in self-reported satisfaction rates in these categories in NSS data between students studying STEM subjects, which tend to be higher than among students studying arts subjects. Most students lack an objective point of reference for what good teaching in higher education level looks like and NSS data is not appropriate for use as a proxy for teaching quality.

There are also other problems with NSS data, including: (a) the likelihood that satisfaction is less dependent on teaching quality than on demographic patterns (gender, age, socioeconomic background, ethnicity, etc) and on students' circumstances (commuter students, part-time study, part-time work, etc); (b) the possibility of gaming; and (c) non-comparability, owing to factors such as student boycotts.

That this data is collected as a snapshot during the final year of the students' study also renders it unrepresentative of the situation as a whole. We suggest, along with many others since the introduction of the TEF, that a more relevant measure is student engagement with their course and institution (https://www.heacademy.ac.uk/system/files/dimensions_of_quality.pdf). This reflects far better the dynamics of the student-educator exchange and explicitly acknowledges the role of students in contributing to their own experience rather than the more passive model of students as recipients of knowledge (or market consumers) that student satisfaction surveys imply.

We are also concerned that NSS is subject to a continuing review and therefore the inherent uncertainty in using it as a basis for a new model of TEF which, we would hope, should be stable for more than a year or two.

We strongly disagree that the OfS should produce numerical indicators based on student outcomes indicators defined consistently with the indicators proposed for the regulation of student outcomes through condition B3.

The use of the Graduate Outcomes dataset supports out-of-date thinking around measuring success through high-achieving entrants going on to financial success. It does not account for students' own views about their post-HE destinations, nor does it capture the distance travelled for students from different backgrounds entering higher education, nor does it adequately account for regional variation in inputs and outcomes. What's more, the below-target response rate to this survey currently has, together with structural response bias, not been helped by changes to the methodology around telephoning students.

We note the limitations of the Graduate Outcomes survey's Standard Occupational Classification (SOC 1-3) approach. Specialist Engineering graduates, in particular, may not progress to conventional graduate work (for example aid work) yet be considered world-leading. The 10-year revision schedule of SOC is particularly limited for the fast-paced technological discipline of Engineering. Its approach to interim study and employment activities also presents as a disadvantage to Engineering graduates, where those going on to professional pathways or taught postgraduate programmes may disproportionately achieve negative interim outcomes.

We tend to agree that, for TEF purposes, the OfS should indicate a provider's performance in relation to its

Q9. To what extent do you agree with our proposal for indicators (proposal 9)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.

benchmark. However, we note that the proposed progression benchmark draws on 'geography of employment and earnings' quintiles but the reality of how higher education institutions help to deliver local skills priorities is much more complex than this. This is really important in engineering.

Q10. To what extent do you agree with our proposal for expert review (proposal 10)? 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 disagree

Comments:
The EPC would welcome an approach which makes better use of existing regulation frameworks (such as Ofsted in relation to degree apprenticeships and accreditation in relation to professional courses), where on the ground evidence of high quality is recognised as a positive indicator without deferring to deficit model proxy measures. Dismissal of sensible and established regulatory and professional outcomes which already hold providers to account, at subject level, will lead to over-regulation of the highest quality courses in the sector. OfS's approach is a concern in relation to regulation hierarchy; burden on specifically in high-cost subjects; workload and impact on students; and – in engineering especially – the onward impact of international standing.

Q11. To what extent do you agree with our proposal for the assessment of evidence (proposal 11)? 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 disagree

Comments:
While the panel interpreting and weighing up the evidence by following a set of principles and guidelines may work in what OfS considers as standard provision, it cannot be fairly and universally applied in Engineering.

We note that there is a growing number of specialist Engineering providers, where data for student cohorts within the student outcomes indicator may be suppressed. Typically, the proposed statistical uncertainty approach in this context relates to the size of the student population, where smaller numbers can lead to greater uncertainty. We therefore note that these proposals may have a specific impact on such "non-standard" provision, limiting student choice, and disproportionately impacting upon these smaller, specialist providers.

We are unclear how principles and guidelines which include that the indicators should contribute no more than half the evidence of excellence in each aspect; and the two aspects should be equally weighted when deciding the overall rating will apply in these circumstances.

Q12. To what extent do you agree with our proposal for published information (proposal 12)? 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 disagree

Comments:
While we agree that the outcomes and the evidence used in such assessment processes per se should be published in an accessible and timely way, we do not agree that inclusion of the information in DiscoverUni and UCAS supports meaningful student decision-making. Potential students are not always rational economic actors, choosing what and where to study based on their own long-term benefit. Instead these decisions are made on a more instinctual basis rather than a divorced rational weighing up of the data and evidence.

What's more, research shows that around 75% of potential students decide on their course of study first and then choose the institution at which they would like to study. Given that the numeric thresholds proposed in the Student Outcomes consultation will permit and even encourage cross-comparison between institutions at subject level. We wonder what – if any – value the TEF will add to student choice?

Ultimately, the lack of subject granularity in the TEF renders it meaningless, or worse, actively misleading. TEF compromises professional accreditation, notwithstanding that a lack of accreditation is not a proxy measure (metric) of poor quality as there are reasons why not all Engineering degrees are accredited at a given time that have no bearing on quality (e.g., new programmes may not have been considered for accreditation yet or an accreditation visit is delayed while a Department undergoes a major building programme). Potential students may, for example, choose inadvertently to study non-accredited Engineering course on the basis of this being offered by a Gold provider, not understanding the critical impact on their eligibility to practise that this may have.

Q13. To what extent do you agree with our proposal for the communication of ratings by providers (proposal 13)? 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 disagree

Comments:
A provider should be able to display and promote its own TEF rating in accordance with a set of guidelines only if such guidelines prohibit the suggestion that the rating is, in any way, subject-related (see our answer to question 12, above).

Q14. To what extent do you agree with our proposal for the name of the scheme (proposal 14)? 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 disagree

Comments:
As the proposed metrics are not a measure of teaching excellence, we do not agree that the scheme should be named the Teaching Excellence Framework. To avoid misrepresentation and encouragement of a heuristic misuse of the data in student choice, Teaching Excellence should not be referenced in the title. We suggest “Outcomes Rating” might be a more apt description.

Q15. To what extent do you agree with our proposal for the timing of the next exercise (proposal 15)? 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 disagree

Comments:
The plan to execute the next exercise during 2022-23 – that is to open the TEF submission window in September 2022 in order to publish outcomes in spring 2023 – will create an unnecessarily high-pressured start to the new academic year. This will put added strain on already-stretched staff who are set to be dealing with the first cohort of undergraduates who have not taken any exams prior to their A level (equivalents). This is particularly pertinent in Engineering; since school curricula deny most students the opportunity to study engineering, the taking of steps to meet the needs of students in the context of the B3 changes with fewer proxies for the suitability of the student to succeed in Engineering will already be an unhealthy pressure and many departments are planning mitigating steps that will be disrupted by unnecessary regulatory burdens.
More generally, if future exercises are to be conducted every four years, it would be appropriate to stagger the TEF changes from the changes to the B3 baseline standards with more regard to staff welfare.