Aunt Sally TEF response v.1 for EES committee 09/10/25

**Q1a. What are your views on the proposed approach to making the system more integrated?**

We support reduced duplication and burden but attempts to simplify the process extinguishes necessary nuance and disserves the contextual spectrum at play both within and between providers.

By reframing TEF as a public announcement of the regulator’s B condition performance, the OfS is presenting an entirely different proposition to the existing framework. TEF becomes more conceptually confused, where it both conflates student outcomes with teaching quality and teaching excellence with regulatory compliance. It is difficult to see where teaching excellence is fostered in the proposed exercise.

The Teaching Excellence Framework should be developed as an enhancement-oriented exercise, grounded in evidence of learning gain and authentic teaching quality, not proxy metrics. A B3 conditions heuristic should not be confused with a TEF, by name or implementation.

The extension of the TEF to all providers will spell greater pressure to streamline the process — that might disadvantage nuanced programmes. It is critical to Engineering that programmes are diverse in mission, size, length, etc, and our work for The Royal Academy of Engineering’s Engineers 2030 shows great innovation in engineering. Under the proposed regime, the metrics do not only penalise providers who admit diverse cohorts providers, even the well-established may be less able to experiment, take pedagogic risk, or invest in innovation if penalties loom. With European engineering education already perceived to be ahead, this is threat to engineering education.

Foreseeable unintended consequences of the proposed approach include:

* Misguided applicant / student perceptions of individual course quality, especially internationally.
* The incentivisation of selectivity of inputs and applicant “creaming”.
* Cliff edge funding boundaries in a spectrum context.
* Hidden and at-risk pockets of excellence.
* Provider-driven reductions in courses where the cost to outcomes ratio is not favourable. This could include strategically important subjects such as engineering.
* A drive for homogeneity which stifles innovation.
* An English approach misaligned with UK and international standards of excellence.

We caution that integration must not “flatten out” disciplinary nuance: the engineering domain involves professional accreditation, lab-based activity, placement years, and cohort heterogeneity, and these must not be obscured by a generic overlay. We urge the OfS to embed subject-sensitive flexibilities and ensure that integration does not translate into a one-size-fits-all approach.

There is room in the proposals for more complexity. A subject level exercise, for example, may be more complex, but would better meet the aims of the TEF. There is no point in simplicity if it serves no-one.

**Q1b. Do you have views on opportunities to reduce duplication of effort between the future TEF and Access and Participation Plans (APPs)?**

We caution against incentives that drive providers to reduce high-cost, high-impact teaching (e.g., labs, placements) or marginalise widening-participation activity that has long-run societal benefits. The OfS must also ensure that metrics do not penalise providers who admit diverse cohorts, or women into engineering, for example.

A reduced burden is helpful, but conflating the two purposes is not. We recommend that the OfS publish a **mapping of overlapping indicators** and a “transfer matrix” showing where APP and TEF *data* can be used.

**Q2a. What are your views on the proposal to assess *all registered providers*?**

In principle, assessing all registered providers underscores fairness, transparency, and accountability. However, TEF has, until now, been voluntary and we are concerned that increasing regulatory and compliance demands may erode institutional autonomy, reduce space for flexibility, and push more of the system into formulaic, “templated” responses.

The extension of the TEF to all providers will spell greater pressure to streamline the process — that might disadvantage nuanced programmes. It is critical to Engineering that programmes are diverse in mission, size, length, etc, and our work for The Royal Academy of Engineering’s Engineers 2030 shows great innovation in engineering. Under the proposed regime, the metrics do not only penalise providers who admit diverse cohorts providers, even the well-established may be less able to experiment, take pedagogic risk, or invest in innovation if penalties loom. With European engineering education already perceived to be ahead, this is threat to engineering education.

Engineering programmes often rely on local decisions (e.g. lab scheduling, project assignment, industry integration). Over-templated regulatory systems may constrain that local flexibility, which is a risk for innovation or responsiveness to industry change.

We are also concerned about disproportionate burden on smaller, newer, or specialist providers, particularly those without mature data infrastructure or internal capacity to prepare submissions. Some may lack established TEF experience or may only offer niche programmes.

We also note that because many engineering providers already engage with accreditation and quality assurance processes, the incremental burden may be manageable if well aligned; but care must be taken not to duplicate (or undermine) effort.

**Q2b. Do you have any suggestions on how we could help enable smaller providers, including those that haven’t taken part in the TEF before, to participate effectively?**

We suggest proportionate, light-touch submissions, phased roll-out, and reduced duplication. Integration must mean “collect once, use many times.”

**Q3a. What comments on what provision should be in scope for the first cycle? (e.g. inclusion of apprenticeships, partnership provision)**

We believe that limiting the first cycle to undergraduate degree programmes (with optional inclusion of apprenticeships under safeguards) is prudent to reduce complexity while the system stabilises.

Many engineering providers deliver diverse L4/L5 provision and degree apprenticeships whose outcomes differ from full-time degrees so we should expect that, at minimum, OfS apply separate indicators so engineering providers are not penalised for delivering important technical routes.

TEF should treat integrated master’s structures (which blur UG/PGT boundaries) separately as an international reputation safeguard.

**Q3b. Comments on proposed approach to expanding assessments to PGT in future cycles**

There seems to be no discussion in the proposals or sector on how 4- or 5-year integrated programmes should be treated under the 2025 design.

Engineering has distinctive structures: most UK institutions offer integrated MEng programmes, which blur undergraduate/postgraduate boundaries. Current proposals do not account for this. Without recognition of integrated MEng/PGT fluidity, metrics may be mis-timed, misclassified, or misinterpreted.

TEF must assess the impact of disaggregation (or not) of outcomes for integrated MEng cohorts to distinguish UG/PGT parts of integrated degrees, as well as apprenticeships, and PGT, or allow narrative explanation. Accreditation evidence should be given weight.

**Q4a. What are your views on the proposal to assess and rate student experience and student outcomes?**

There is a risk of perverse incentives or gaming: e.g. easier modules, avoiding riskier practical work, lowering cohort diversity/profile if this hurts metrics – and mission drift. The EPC has previously argued strongly against over-reliance on NSS data a proxy for quality because they reflect student demographics/circumstances more than teaching quality.

In engineering, any credible experience dimension must allow recognition of intensive lab work, project-based group work, industrial site visits, and professional skills development.

**Q4b. Comments on proposed approach to generating ‘overall’ provider ratings based on the two aspect ratings**

At the very least, ratings for each aspect are needed. Outcomes need to be given more context to avoid a narrowing of access.

The EPC has consistently called for more subject sensitivity in the TEF, not broad provider-level banding. Provider-level metrics risk masking excellent subject pockets that are crucial to professional engineering supply. Even within engineering, disparate sub-disciplines are aggregated.

Narrative evidence should command equal weight. The use of multi-dimensional evidence including employer validation, professional body input, placement quality, and student engagement (UKES, learning analytics) should be embraced.

**Q5a. Views on the proposed scope of the student experience aspect, and how it aligns with relevant condition B of registration**

Engineering programmes often have non-standard delivery modalities (e.g. project weeks, lab rotations, fieldwork) that may not map cleanly to generic criteria. Some nuance or subcriteria should allow for that difference.

We suggest the criteria incorporate discipline-specific indicators (e.g. lab resource satisfaction, project supervision quality, access to specialist kit).

**Q5b. Views on the initial draft criteria for the student experience rating (Annex H)**

We believe the phrasing should explicitly accommodate discipline variation.

**Q5c. Views on evidence to inform judgments about student experience**

The EPC supports more nuanced measures of student engagement (e.g. UK Engagement Survey, learning analytics) rather than satisfaction surveys. NSS surveys are insufficient as coverage does not vary. Student voice must be balanced with richer engagement evidence. Discipline-adjusted survey items are suggested.

**Q6. Comments on proposed approach to revising condition B3 and integrating minimum required student outcomes into future TEF**

By reframing TEF as a public announcement of the regulator’s B condition performance, the OfS is presenting an entirely different proposition to the existing framework. TEF becomes more conceptually confused, where it both conflates student outcomes with teaching quality and teaching excellence with regulatory compliance. It is difficult to see where teaching excellence is fostered in the proposed exercise.

The Teaching Excellence Framework should be developed as an enhancement-oriented exercise, grounded in evidence of learning gain and authentic teaching quality, not proxy metrics.

Minimum outcome expectations must be aligned with accreditation outcomes in Engineering. We caution that progression metrics (which track a student’s movement) may be overly simplistic, particularly in engineering with sandwich years and integrated masters.

Contextual factors (student prior attainment, entry route, demographic disadvantage, subject differences) must be built into all stages of outcome assessment — otherwise providers serving widening participation cohorts or complex disciplines will be penalised.

**Q7a. Views on proposed approach & initial ratings criteria for student outcomes**

Outcome metrics punish providers who admit more disadvantaged students or recruit more women into engineering (since average salaries differ). At the very least, the TEF needs careful discipline and regional, as well as demographic, benchmarking that does not introduce perverse incentives.

The lack of benchmarking in the metric data will be a disincentive to recruit women, students from disadvantaged backgrounds, those with lower prior attainment, black students, students with disabilities, care-experienced, etc. It will also be damaging to universities outside cosmopolitan centres where wages are higher and jobs are easier to find.

Value added would be a better metric overall.

**Q7b. Comments on the proposed employment / further study indicators, and suggestions of others**

We recommend inclusion of employer validation metrics, professional body recognition, or alignment of graduate roles with engineering discipline.

Be cautious of overreliance on salary outcomes (which can be skewed by location, economic cycles), particularly disadvantaging engineering where salaries differ by gender and global mobility.

**Q7c. Views on proposal to consider limited contextual factors when reaching judgments**

We strongly endorse the inclusion of contextual factors (entry qualifications, demographic background, part-time status, placement years) to adjust expectations and fair comparisons.

There is a need for discipline-sensitive benchmarks.

**Q8a. Views on who should carry out assessments (and enabling more assessors)**

Assessors and assessment panels must include discipline experts, specifically engineering academics or industry practitioners (engineers assessing engineering) so that technical nuance is properly understood.

**Q8b. Views on only permitting representations on provisional rating decisions of Bronze or “Requires improvement”**

Comment on heuristics here.

**Q9a. Views on alternative means of gathering student views where NSS data are insufficient**

Student surveys (NSS) are always insufficient; richer engagement measures (UKES, placement feedback) are more valuable.

There is little recognition of discipline nuance in student voice data. We recommend weighting qualitative evidence equally with metrics; ensuring representation from industry and accrediting bodies on TEF panels.

**Q9b. Views on not rating student outcomes where indicator data are insufficient**

Narrative evidence and alternative, discipline-level indicators should still be considered.

**Q10a. Views on including direct student input for student experience assessments**

**Q10b. How to enable more student assessors from small, specialist and college-based providers**

**Q11a. Views on proposed scheduling of providers for first assessments**

Many providers are undergoing major restructuring, including merger discussions owing to the financial collapse of the sector. Unless the under-resourcing of high-cost courses is resolved, perverse incentive to chase whatever courses perform best in the metrics or search for the best trade-off between metric outcomes and low cost. The scheduling with disadvantage some providers in any event.

Use modular assessments rather than monolithic cycles (e.g. providers submit different evidence modules in different years). (Not really an engineering point.)

**Q11b. Views on scheduling subsequent assessments**

Many providers are undergoing major restructuring, including merger discussions owing to the financial collapse of the sector. Unless the under-resourcing of high-cost courses is resolved, perverse incentive to chase whatever courses perform best in the metrics or search for the best trade-off between metric outcomes and low cost. The scheduling with disadvantage some providers in any event.

Use modular assessments rather than monolithic cycles (e.g. providers submit different evidence modules in different years). (Not really an engineering point.)

**Q12. Comments or evidence about risk factors to quality in draft risk monitoring tool (Annex I)**

This is an opportunity to evidence the financial precarity of the sector. Staffing and financial stress indicators, infrastructure risks (lab maintenance, equipment renewal, software licensing, health & safety issues) and industry links / placement pipeline stability are all possible indicators.

**Q13. Comments on proposed incentives and interventions associated with TEF ratings**

We should caution against incentives that drive providers to reduce high-cost, high-impact teaching (e.g., labs, placements) or marginalise widening-participation activity that has long-run societal benefits.

If provider ratings become the primary lever for funding/fees, institutions will game for metrics at the expense of strategically important provision (e.g., high-cost lab work, outreach, widening participation). The OfS must ensure that metrics do not penalise providers who admit diverse cohorts or women into engineering.

If TEF ratings are tied strongly to financial levers, engineering departments will feel high stakes. Engineering HE is systematically underfunded, and departments are commonly transitional state to manage; thus may feel more regulatory pressure rather than encouragement. The more providers, the greater pressure to streamline — that might disadvantage nuanced programmes. It is critical to Engineering that programmes are diverse in mission, size, length, etc, and our work for The Royal Academy of Engineering’s Engineers 2030 shows great innovation in engineering. Under the proposed regime, the metrics do not only penalise providers who admit diverse cohorts providers, even the well established may be less able to experiment, take pedagogic risk, or invest in innovation if penalties loom. With European education already perceived to be ahead, this can’t be allowed to happen.

Unless the under-resourcing of high-cost courses is resolved, perverse incentive to chase whatever courses perform best in the metrics or search for the best trade-off between metric outcomes and low cost. We caution that linking TEF rating to expansion or resource allocation may exacerbate inequalities between large, well-resourced providers and smaller/specialist ones.

Incentives should include positive carrots (e.g. additional funding for improvement, innovation grants, recognition, support) not just penalties.

**Q14a. Views on the range of quality assessment outputs and outcomes to publish**

Simplistic ratings as misleading and damaging internationally. A provider “requires improvement” rating would be more so. Accredited and excellent Engineering would be seen as “substandard” abroad. Engineering has a heavily international student base (could add data here including the financial precarity.

Publish subject-level indicators / banding (not just provider level). The lack of a subject-level TEF means that universities with excellence in engineering will be tarred by the brush of other subjects (or, if engineering isn't excellent, they may be able to pass it off as such thanks to other high-performing subjects).

Include narrative highlights / exemplar practice sections for providers to show what lies behind metrics, not just raw scores.

**Q14b. How to improve usefulness of published information for providers and students**

We strongly oppose reductive TEF labels. International students and employers will apply the provider-level broad brush to engineering, risking reputational damage to engineering provision. The proposals do not go far enough to replace medal ratings with rich, contextualised dashboards.

Publish subject-level indicators / banding (not just provider level) .

We suggest publishing sensitivity / fragility analyses (e.g. how small shifts in student outcomes might move rating).

**Q15. Comments on the proposed implementation timeline**

**Q16. Comments on the two options for publication of TEF ratings during transitional period (or alternative suggestions)**

**Q17. Comments on approach to ongoing development and plans to include PGT in future cycles**

Many engineering programmes have integrated postgraduate levels built in (e.g. MEng). This means that student outcomes (graduation rates, employment, further study etc.) and experience may span longer times, more complex progression, and different cohorts (some in years that are postgraduate in level).

The integrated pipeline means that student experience in later years is qualitatively different (more research, more depth, more independence). But if TEF treats all years in one undifferentiated way, the later years may be judged by the same metrics as earlier ones, losing nuance.

For MEng programmes, the postgraduate years often embed more advanced, specialist, or research components tied to professional standards. If TEF metrics don’t recognize that extra work (or weight it properly), programmes might be penalised.

**Q18. Aspects of proposals found unclear**

By reframing TEF as a public announcement of the regulator’s B condition performance, the OfS is presenting an entirely different proposition to the existing framework. It is difficult to see where teaching excellence is fostered in the proposed exercise.

TEF remains conceptually confused: “better student outcomes” are not the same as “better teaching quality”. Conflating student outcomes with teaching quality. TEF should be developed as an enhancement-oriented exercise, grounded in evidence of learning gain and authentic teaching quality, not proxy metrics.

That accreditation already assures quality in engineering remains unaddressed.

The interaction between TEF, APP, and other regulatory regimes could use more mapping and worked examples.

**Q19. Additional suggestions for delivering objectives more efficiently or effectively**

A better way to reward unis is to make TEF more meaningful to prospective students and staff, so it does become the driver of choice that it was conceived as.