

Response ID ANON-TWMW-TNPZ-U

Submitted to **Independent Review of TEF: Call for views.**

Submitted on **2019-03-01 11:37:48**

Who are you?

1 What is your name?

Name:

Johnny Rich

2 What is your role/position (if relevant)?

What is your role/position (if relevant)? :

Chief Executive

3 What is your email address?

Email:

j.rich@epc.ac.uk

4 In what capacity are you responding to this consultation?

Representative organisation, business, or trade body

If other, please specify below:

5 Are you responding on behalf of an organisation (eg. higher education provider, student union or representative group)?

Yes

a. If yes, what is the name of your organisation?:

Engineering Professors' Council

Yes

6 Have you been involved preparing for or writing a TEF or subject TEF submission?

No

7 Have you been involved as a TEF assessor or panel member (for provider TEF or in the subject pilots)?

No

8 Would you like us to keep your responses confidential?

No

If yes, what is the reason for confidentiality?:

9 Please indicate which UK country/other country you are responding from.

Please indicate which UK country/other country you are responding for. :

UK-wide

If you are responding from a country outside of the UK, please write this in below.:

E

Why have TEF?

10 Do you support the aim of assessing the quality of teaching excellence and student outcomes across providers of higher education?

Don't know

Please explain why:

In principle, the EPC supports the provision of timely and relevant information to help inform potential students' decisions. However, this must start with the recognition that teaching excellence does not reside within the institution, teacher or department in isolation; rather it is the property of the relationship between them and the student. It is dependent on different students' needs. Different HEIs may be better at meeting the requirements of different students. However, the current approach actually undermines the efforts of students to ask if a university is the right place for them, based on their individual needs. What one student

finds inspiring for their independent learning, another may find frustratingly unsupportive.

Recognising student diversity requires a best-match approach, not a one-dimensional hierarchy. As one of our members put it: “the best teacher is not the one with the best students but the one whose students learn the most and so progress properly”. Any fair exercise in assessing teaching quality would need to come up with a way of assessing the learning journey of each individual student.

The TEF also aims to enhance teaching quality, which we support because we recognise the need to rebalance the teaching and research functions of higher education. However, the focus on outcomes that have little to do with teaching quality means that any enhancement effect is negligible compared to what our members report as a significant administrative burden and a distraction from the task of supporting students’ learning.

We note that section 25 of the Higher Education and Research Act 2017 permits the OfS to operate a scheme that gives ratings to English higher education providers according to the quality and standards of the higher education they provide. However, better student outcomes are not equivalent to better teaching quality. For this reason, we welcome the shift of the TEF nomenclature from ‘teaching excellence’ to the inclusion of ‘student outcomes’. However, it is our view that any reference to teaching excellence – including the TEF acronym – is misleading. The shift is presumably at least in part due to the fact that any absolute measurement of teaching quality has proved at best problematic and at worst, conceptually impossible, but the ‘TEF’ terminology is now at odds with the exercise.

Moreover, the idea of ‘better’ student outcomes are more complex than the TEF reflects. For example, the outcomes of higher education are a function of how education is more widely valued by society, rather than specific to its quality. Also a graduate may feel personally fulfilled and may contribute greatly to society in ways that are not reflected by their salary.

Why have TEF?

11 These purposes fall into two main areas: providing information, and enhancing the provision of higher education.

Both are equally important

b. Please outline below the reasons for your answers :

Firstly, we disagree that TEF is currently providing useful information to better inform students’ choices about what and where to study. In 2018, Youth Sight’s undergraduate tracker revealed that over two-thirds of applicants hadn’t even heard of TEF (<https://www.youthsight.com/higher-expectations>).

In addition, the research available clearly shows that this type of information does not directly support choice nor make it meaningful

(<http://38r8om2xjhh125mw24492dir.wpengine.netdna-cdn.com/wp-content/uploads/2016/08/Moments-of-Choice-report.pdf>). Instead this information tends to be used heuristically. That is to say it is used over-simplistically as a shortcut to ‘good’, ‘okay’ and ‘bad.’ Heuristic information discourages students from further consideration of their choice and encourages sub-optimal choices.

Research also shows that around 75% of potential student decide on their course of study first and then choose the institution at which they would like to study (https://www.heacademy.ac.uk/system/files/resources/student_choice.pdf), rendering anything less than subject level TEF impotent. Even at the subject level that TEF is currently examining, the scope for misleading aggregation is far too great. The engineering subject level, in particular, groups together many disparate and diverse disciplines. For student choice to be informed in any kind of meaningful way, we believe the underpinning principle of any system must be for the greatest degree of granularity that is reasonably possible without losing comparative impact in order to consciously avoid the trap of heuristic choice.

Secondly, while TEF may be supporting the enhancement of provision, the risk of institutional ‘gaming’ of metrics is an inevitable consequence of poor proxies (see below).

Most of our members feel that TEF serves neither of these purposes well and any benefit that there might be is far outweighed by the cost in terms of time and money. It has been proposed that it would be both more effective, cheaper and less prone to gaming simply to publish the proportion of staff who are qualified to teach (which is slightly different from having a teaching qualification), for example those holding FHEA or higher. Even this, however, would need to be contextualised as there are circumstances, such as Visiting Professors from industry, where individuals have attributes that more than compensate for a lack of teaching credentials.

12 Should there be any other purposes for TEF?

Should there be any other purposes for TEF? :

The EPC membership does not believe that the TEF is suitable for the purpose of meeting the needs of employers, business, industry due to the heuristic use of the proxy metrics employed. The way it operates currently is too problematic for its reach to be extended.

We note that the subject-level TEF does not purport to, and is not capable of, comparing subjects with each other. But it is highly unlikely that potential students and the wider public will realise that subject-level TEF is intended to be used to inform a student choosing between an engineering course at provider A or provider B, rather than a student choosing between an engineering course or an architecture course at provider A.

It is important that the TEF does not compromise the value of professional accreditation, e.g. if accredited programmes sit within bronze-rated subject groupings or if gold groupings include non-accredited programmes. Equally, it is important that lack of accreditation is not treated as a proxy measure (metric) of poor quality in the subject-level TEF 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 whilst a Department undergoes a major building programme). We would strongly urge against any income setting (including T grants) based on quality measures.

What is TEF?

How does TEF work?

13 Are the criteria used in TEF (see Figure 1 for a list of the criteria) appropriate?

Yes

If not, what criteria would be more appropriate? :

We consider most of the criteria to be valid (with the possible exception of valuing teaching, which some members feel is too nebulous a concept to be quantified fairly), although we do have concerns regarding the metrics which are included in our answer to q. 14. We would also like to see some additional criteria included:

1. Student support resources / offer. Student support is a crucial part of learning environment, particularly in relation to inclusivity and mental health.

2. Professionalism of teaching. We would suggest a metric around the proportion of teaching staff who are qualified to teach. This is a broader definition than simply those who have a teaching qualification, as we fully recognise the value of those in industry being able to lecture on an occasional or regular basis and an unsophisticated approach to credentialism might merely encourage gaming.

Currently providers do not collect this information as systematically as they should. However, if teaching professionalism were to be included as a metric, collection of the data would be incentivised. That said, the correlation between proportion of HEA Fellows and TEF ranking (<https://www.timeshighereducation.com/news/no-link-between-class-size-and-englands-tef-outcomes>) is not strong. This suggests that either HEA Fellowship adds little to teaching or that the TEF ranking does not reflect teaching excellence adequately. We strongly support the latter suggestion because, as explained elsewhere, the metrics of TEF have little to do with teaching quality.

3. Continuing professional development. HEA Fellowship is often a precursor to maintaining a professional standing as a teacher, but it is not a proxy for it. Furthermore, in a fast-moving discipline like Engineering, it is important to maintain professional standing as an engineer. Like FHEA, professional recognition such as CEng is indicative, but not an adequate proxy. That said, the fact that maintaining professionalism as an engineer (or a medic, computer scientist or architect, say) is important should not disadvantage the discipline in any TEF exercise relative to other disciplines.

4. Student engagement. This is not currently sufficiently reflected – there is already a framework for engagement: the UKES, which could be utilised here (see our response to q.14).

Many EPC members would like to see a measure of added value for diverse students with diverse needs. We acknowledge, however, that this would require a challenging root-and-branch reinvention of TEF.

14 There is no direct measurement of teaching quality currently available. As a result, the TEF uses existing data as indirect measures of teaching quality. These measures are known as “proxies”.

No

b. If you answered no, what metrics would be more suitable proxies? :

There are broadly acknowledged issues with many of the key elements of the provider level TEF framework. Of particular concern to the EPC are: Teaching quality

1. Student Survey (NSS) data are relied on to assess teaching quality (both on the course in general and assessment and feedback) as well as for assessing academic support within the learning environment. Yet student self-reported satisfaction is emphatically not equivalent to teaching quality, but rather a reflection of the gap between the student's expectation and what they perceived 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 at higher education level looks like and while student satisfaction is an important measure, it is not appropriate to use it as a proxy for teaching quality.

There are 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.

We suggest that a more relevant measure than satisfaction is students' engagement with their course and institution. 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. The significance of student engagement as an indicator of learning gain had already been acknowledged and accepted by HEFCE. Questions relating to student engagement were added to the NSS last year. However, these are still subjective indicators and limited in their value. There already exists a more thorough student engagement survey, the UK Engagement Survey (UKES) run by the Higher Education Academy (now AdvanceHE), which has been adopted by many HE providers. Wider use of sophisticated measures of engagement, such as UKES, would provide a better proxy for teaching quality than NSS. However, while preferable to satisfaction, engagement is no a perfect solution: the reflection of teaching quality is still only partial and it is still dependent on different modes of engagement in different institutions and variability in how these can be robustly measured.

In addition, the use of learning analytics is becoming increasingly widespread and can capture a range of potentially useful data on student presence and activity within the university (for example, library usage, computer logins, completion of assignments). Data like this could be used to develop a traffic light system to identify students at potential risk of, for example, dropping out or wellbeing issues and this more imaginative approach could then be used in evidence as part of student engagement. However it adds little for such activity to be captured within TEF, either in terms of improving TEF or as an incentive for the activity.

Learning environment

2. Continuation is essentially about student non-progression (drop-out) rates. There is only scant research demonstrating a link between student drop-out rates and teaching quality. There is however a body of evidence showing that students' personal circumstances and their levels of engagement are contributory factors (See, inter alia, Yorke, M. *Tertiary Education & Management* (1998) 4: 59. <https://doi.org/10.1007/BF02679397>). Drop-out rates are of course important and relevant to student outcomes but must not be misrepresented as indicative of teaching quality and their inclusion in TEF as a performance metric serves only to discourage institutions from recruiting students who may, statistically, be more prone to drop out rather than encouraging them to provide better support.

Student outcomes and learning gains

3. These measures rely on the Destinations of Leavers from Higher Education survey (DLHE) declared activity six months after qualification. DLHE measures tend to reflect well on engineering graduates who tend to be in demand from employers and thus find employment more quickly than graduates in many other disciplines. However, this measure is related to outcomes and is not related to teaching and so does not belong in a framework that makes any claim to be about teaching quality.

'Learning gain' is not measured or evidenced in any way in the 'Student outcomes and learning gains' criteria, which makes its inclusion misleading.

LEO data: While this does represent progress as an employment outcome metric over DLHE, which relied on self-reporting, there are still many issues with the LEO data. Firstly, given the longitudinal nature of LEO data (and the proposed five- or six-year gap between TEF gradings), possible prospective students will be looking at data that often relates to a course that was taught more than a decade previously. This is inherently problematic, but for an industry as fast-paced as engineering, both driving and driven by technological developments, a decade is likely to involve a complete change in industry and the labour market as well as the degree programme.

The data, as regards engineering students, is also likely to have significant gaps. As this is tax data, UK graduates who secure work abroad will not be included, which is likely to have a pronounced impact on engineering which has a particularly mobile workforce. This is true in both industry and academia and across all skill levels. Engineering companies tend to recruit from a global talent pool; UK engineers are in high demand internationally and can readily secure employment in other countries. Equally, UK engineering courses have particularly high rates of international students and their exclusion from LEO also means significant gaps in the data.

Measuring income is an inherently crude, one-dimensional measure, valuing city traders above nurses and within engineering, industrialists over academics and (early stage) entrepreneurs. Clearly the economy and wider society needs and wants people to go into nursing, teaching and a whole host of other occupations with relatively lower salaries as the recent industrial strategy recognises. A richer, more nuanced approach to student outcomes is needed if it is to reflect the true value of a plethora of different career paths.

Good employment outcomes and high productivity rely on graduates (and others) having flexibility, soft skills and character attributes (as well as crucially social capital) in addition to harder skills and specific competencies. There is an important distinction between employment and employability (Rich, J. *Employability: Degrees of Value* (2015), Higher Education Policy Institute. <http://bit.ly/HEPI-Employability>), which is not merely overlooked by TEF, but implicitly repudiated without reason: an individual being employable is not the same as actual employment and a true measure of learning gain should go across all of these areas. LEO seeks only to measure UK-based employment and only then according to earnings.

15 The TEF metrics are benchmarked to account for factors such as the subject of study, prior attainment, ethnicity and educational disadvantage of the provider's student intake (see that 'What is TEF?' section for detail).

Yes

b. Does TEF benchmark for the right factors?:

While we agree benchmarking can be a valuable tool to allow a more meaningful interpretation of a provider's metrics, the use of benchmarks in relation to provider-level TEF has serious limitations, such as the reliance on POLAR data as a proxy, because it is itself already a much-debated proxy and using a proxy as a proxy is irresponsible.

Importantly, TEF benchmarking does not fully take into account geographical patterns of economic deprivation and social disadvantage. Student employment outcomes are largely related to students' choice of course, their level of prior attainment (and subject-level TEF should do nothing to discourage those providers that are excellent in ensuring access and support to those with lower levels of prior attainment), social capital and – critically – region. Providers in low employment regions (such as the South West) are always going to score lower on a variety of metrics than regions such as London, regardless of teacher quality or student experience. These outcomes are also vulnerable to wider economic changes (which itself also weakens the proposition that subject-level TEF ratings be five or six years old).

In engineering, gender also skews the outcomes. The male-dominated composition of HE engineering courses (only 16% of first-degree undergraduates in engineering and technology subjects were female in 2015 (EngineeringUK State of the Nation 2017 report)) effectively means those providers that do succeed in attracting more women in to study engineering will not be made sufficiently visible and will be disproportionately disadvantaged under LEO data (owing to differences in average male and female earnings). Placing an emphasis on earnings as an outcome measure, creates an incentive for institutions to favour the admission of men over women as well as discouraging the admission of other groups with lower than average earnings (including BAME students and student with disabilities).

While some of these issues can be addressed through benchmarking, there would still be unintended and undesirable consequences unless any benchmarking covers all the right groups accurately and takes into account desired outcomes (i.e., positive benchmarking in favour of those with more female students rather than only according to adjustments to remove expected differences).

This point will impact metrics based on DLHE and LEO data. The latter as a longitudinal measure will be further impacted by the (a) the greater propensity of women (particularly those under 35) to take career breaks, (b) the slower career progression of women owing to gender discrimination, and (c) the lower proportion of female engineering graduates who enter and remain in engineering roles.

We are unclear on how institutional offer is currently benchmarked. It is also not clear to us where higher apprenticeships (that range from level 4 to level 8) and degree apprenticeships (available at levels 6 -8) are accommodated in the TEF as their inclusion could have a significant impact on the data and the split between full-time and part-time courses.

16 The TEF process uses both quantitative evidence (for example, the core metrics) and qualitative evidence (for example, the written submission).

a. What are your views about the balance of quantitative and qualitative evidence considered in arriving at ratings?:

There is a general problem with aggregation of ordinal scales, disparate metrics and data types. This is not good data processing.

There is evidence that the qualitative narrative made significant difference (<https://www.hepi.ac.uk/2017/10/19/going-gold-lessons-tef-provider-submissions/>).

While this may reflect better contextualisation of the data, it may just as easily reflect greater effort, resource and skill invested in the preparation of the qualitative submission. It is important to the integrity of the process that the discretion in determining the difference is improved. This also means the process needs to be clear and simple about how qualitative evidence will be used and what factors will be taken into consideration.

b. Are there any other aspects of the process that you wish to comment on?:

The broader point here is that the TEF model (at both subject-level and at provider level) should not seek to impose a single rigid model of what good looks like. Rather one of the recognised strengths of the UK HE sector is its diversity and ability to innovate and this must be encouraged rather than stifled. The rigidity of the TEF seeks to use a single framework to compare the proverbial chalk and cheese. That encourages cheese to become more chalky and chalk to become more cheesy which is detrimental to both.

Providers have very different missions and approaches (for example, they may choose to focus and excel on access issues, PhDs, regional or industrial engagement). They should be measured against that in a way that requires continuous improvement and genuinely stretching targets. We would rather see a framework in which providers are required to set their own goals in terms of teaching metrics and outcomes, based on their own ambitious aims, and then to rate them according to whether they succeed in meeting those goals.

To prevent an excessively cherry-picking approach, these alternative dimensions could form part of a more inclusive framework that would explicitly acknowledge the different focuses and strengths of higher education providers rather than trying to force them all into the same rigid model (the TEF).

Allowing providers to state what is most important to their mission from a dashboard of potential data might also help to counteract gaming which our members feel is an insidious component of TEF, which is facilitated by the overuse of proxy metrics.

To state the obvious, any attempt to compare outcomes from HE providers is fraught with the inherent issue that (a) the inputs (i.e., students) are diverse (for example, academic attainment is correlated with socio-economic advantage (Crenna-Jennings, W. *Key drivers of the disadvantage gap: Literature Review, Education in England: Annual Report 2018* (2018), Education Policy Institute.

<https://epi.org.uk/wp-content/uploads/2018/07/EPI-Annual-Report-2018-Lit-review.pdf>), which is a predictor of ability or potential) and (b) the environment into which graduates enter is so varied.

Are the ratings right?

17 Are the purpose(s) of TEF met by:

No

Please explain your answer:

Reducing a complex and multi-faceted issue like excellence to a three-banded rating 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.

The current system is not capable of providing accurate ratings of teaching excellence. Claiming that it does is unprofessional. Unless and until a better, more multi-dimensional system is implemented – one that does not rely on inappropriate proxy metrics and aggregation – then results should not be presented in the form of ratings.

No

Please explain your answer :

The ratings are NOT right, they are just a league table by another name. As above, reducing a complex and multi-faceted issue like excellence to a three-banded rating 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.

It is worth including a note here on accreditation, which is, of course, an entirely separate exercise to TEF, but which it would be worth the Review Panel considering. 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 other stakeholders. There may be synergies between subject-level TEF and accreditation, although these have distinct and different purposes. Careful communication is needed to ensure that subject-level TEF does not undermine the value of accreditation nor create unintended confusion in the minds of students, parents/advisors or employers. At the moment, the two exercises – although they are designed for fundamentally different purposes and should never be conflated – create obfuscation rather than clarity. Of the two, accreditation serves its purpose more effectively.

No

Please explain your answer :

We strongly advise against use of the 'gold', 'silver', 'bronze' grading system from the provider-level TEF as it is inappropriate. The early evidence suggests that, insofar as any effect is reliably measurable, interest has been stimulated in 'gold' ranked universities mostly among international students (<https://wonkhe.com/blogs/going-global-internationalisation-and-the-tef/>). The logical extension of this is that those ranked bronze are substandard by comparison as there is no lower grading outcome than a bronze. The largest research project to date 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. There is a clear international risk here: EPC members have reported that in Kuwait (and possibly other countries) students are eligible for state funding only at 'top ten' universities in those countries where there is a government-backed league table.

There is a deeper point about the meaning of these rankings. The initial messaging at provider level (when it was optional rather than compulsory) was that a 'bronze' ranking amounts to a good institution, silver meant better and gold represented the best of all. Extending this logic to subject-level TEF effectively means there are no bad subjects as all registered courses cannot receive a lower ranking than a bronze. This is regardless of the Quality Assurance Agency baseline for quality in courses and the fact that some bronze courses may be accredited under the Engineering Council while some courses deemed 'gold' may not be. In effect, this three-tiered approach creates cliff edges that strip out context and nuance to become heuristic by design. Subjects will be perceived as 'good', 'fine' or 'bad' without further investigation into the actual relevance or real meaning of these labels. Far from informing students better, this prompts them to make choices based on badges rather than a rounded picture of suitability.

18 If you answered no, what alternatives you would suggest.

a. For provider-level TEF?:

More thought should be given to the representation of findings in TEF. We welcome the Office for Students' intent to use behavioural science and encourage experimentation to find what works most effectively in encouraging prospective students to engage constructively with the decision-making process as an exercise in developing their understanding of their educational needs.

To this end, an official government ranking is counterproductive. Instead of measuring all providers against the same standard, providers could instead choose their own areas of focus or mission and be judged against their own goals (at least in part).

We would urge the OfS to look at what KEF is proposing in terms of multi-dimensional representation. U-Multirank (<https://www.umultirank.org/>) and uMap (<https://umap.openstreetmap.fr/en/>) are also good examples of multi-dimensional data visualisation.

Any changes to UniStats should be made in consideration of this consultation.

b. For subject-level TEF?:

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Any changes to UniStats should be made in consideration of this consultation.

c. If your previous response(s) reflected on the impact of the TEF on the international reputation of institutions and/or the UK as a whole, we would welcome any evidence or information you can provide that might support your view or help inform the independent review.:

HotCourses measured a deterrent effect among international students against Bronze institutions (see <https://www.theguardian.com/higher-education-network/2017/oct/16/is-the-teaching-excellence-framework-shaping-international-student-choice>).

Has TEF changed anything?

19 Has the introduction of TEF positively changed the educational experience of students (e.g. teaching and learning)?

No

If yes, how?:

The pursuit of the principle has had the effect of raising the conversation around teaching excellence levelling the playing field unfairly skewed by the REF. The policy approach that teaching is valued has led to the transfer of some resource into student focus.

However, in practice, the burden owing to the increased use of metrics – which are often inappropriate or blunt proxies – has resulted in a distraction for those who should more properly be engaged in supporting learning. It has created opportunities for gaming, misleading marketing and dubious employment practice during staff appraisals.

20 Has the introduction of TEF negatively changed the educational experience of students (e.g. teaching and learning)?

Yes

If yes, how?:

The evidence in the sector that an institution can swing between categories in a year (either way, although a university whose data suggests a move from Silver to Bronze is unlikely to re-apply) suggests that the measure is far from robust.

There are some empirical reports that bronze status might be detrimental to students in terms of employer perception of the quality of their course. We note that an Engineering course at a Bronze institution may be 'better' than an arts course at a Gold institution.

The culture of renewed emphasis on teaching excellence has permeated as new pressure on universities, with an additional burden of data collection (for statements and metrics) and an interest in 'gaming'.

Arguably, TEF acts directly or indirectly as a driver for grade inflation, which is detrimental to students, institutions, employers and the higher education sector as a whole.

21 Has the introduction of TEF impacted positively on research and/or knowledge transfer?

Don't know

If yes, how?:

22 Has the introduction of TEF impacted negatively on research and/or knowledge transfer?

Yes

If yes, how? :

The introduction of TEF, REF and KEF has created a culture of metrics which demands a huge amount of leadership and staff resource towards understanding metrics processes (gaming) without addressing goals. We strongly suggest there are more direct ways of promoting purposes than these highly problematic and involved processes.

In many ways it is individual staff who are most negatively affected by the REF, TEF and KEF as it now has become more difficult for each HEI to have its niche strength. With providers seeking to excel, or at least beat their chosen benchmark competition, in all metrics the demands upon individual staff increase. Perhaps staff satisfaction has a place in the metrics as staff who are more satisfied are likely to be more engaging for students and better able to achieve goals in research and knowledge exchange?

Is TEF worth it?

23 Does TEF help you as a student/provider/employer?

Don't know

Please explain the reasons for your answer.:

As an ersatz ranking, TEF is deeply unhelpful to students and providers. However, as a mechanism that aims to raise the recognition of teaching standards in higher education and encourage their enhancement (albeit in a flawed way), it is useful.

24 Explaining your reasoning, what are the most significant costs of:

a. Provider-level TEF?:

b. Subject-level TEF?:

25 Explaining your reasoning, what are the most significant benefits of:

a. Provider-level TEF?:

b. Subject-level TEF?:

Is TEF fair?

26 Are there particular types of students, provision or providers that are disadvantaged by the current design of TEF, in a disproportionate way?

Yes

If so, what changes could be made to address this?:

Engineering, as a discipline and an HE course of study, has several features that are distinct to or more pronounced than in other disciplines. For example, the rapid pace of change in the field driven by technological progress as well as interactions and engagement with industry means its market currency is subject to rapid change. In addition, engineering is increasingly required to engage with people in general, whether they are the users of engineered products or interacting with engineering systems as they go about their daily lives.

Within engineering there is a compelling need to expand provision of part-time and workplace learning yet an HEI seeking the highest rankings is likely to avoid what are seen as risky or more resource-intensive activities.

In consultation with our members, various alternative approaches to TEF were proposed, including the recommendations outlined in response to Q16 above and forms of enhanced quality assurance (such as the former regulation of polytechnic courses by the CNAAB, where the process of enabling an Institution to provide a particular programme of study was subject to an external visit before any student could start the programme).

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 other stakeholders. There may be synergies between subject-level TEF and accreditation, although these have distinct and different purposes. Careful communication is needed to ensure that subject level TEF does not undermine the value of accreditation or create unintended confusion in the minds of students, parents/advisors or employers.

It is also worth noting the impact of the TEF on higher education in Wales where issues such as those raised in relation to benchmarking of data on employment or socio-economic background (see above) are seen as particularly disadvantageous to Welsh providers and students.

27 Are there particular types of students, provision or providers that are advantaged by the current design of TEF, in a disproportionate way?

Yes

If so, what changes could be made to address this?:

Student employment outcomes are largely related to students' choice of course, their level of prior attainment (and subject-level TEF should do nothing to discourage those providers that are excellent in ensuring access and support to those with lower levels of prior attainment), social capital and region. Providers in low employment regions (such as the South West) are always going to score behind regions such as London regardless of teacher quality or student experience.