Engineering Professors COUNCIL
The voice of engineering academics

Meeting of the

EDUCATION EMPLOYABILITY & SKILLS COMMITTEE

will be held at 10.00 on Monday 6th October 2025 via Zoom (see details below)

AGENDA

Item		Lead	Paper ref
1.	Apologies	Chair	
2.	Minutes of last meeting	Chair	EES25/10-01
3.	Matters arising and items not elsewhere on the agenda	Chair	
4.	Toolkits	JR	
5.	Neurodiversity Project	SF	
6.	TEF Consultation	SF	EES25/10-02
7.	Horizon-scanning and scope of work	Chair	
8.	Other business	Chair	
9.	Date of next meeting	Chair	

To join the meeting via Zoom:

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Meeting ID: 833 3407 1262
Passcode: 094813

Next meeting: TBC

Engineering Professors Council
Minutes of the meeting of the
Education, Employability and Skills Committee (EES)
held on 20th May 2025 via Zoom

Present via Zoom
Johnny Rich (JR), Clive Neal-Sturgess (CNS), Georgina Harris (GH), Mike Sutcliffe (MS), Matteo di Benedetti (MB), Alan Brown (AB) and Abel Nyamapfene (AN)

With
Stella Fowler (SF) and Rhian Todd (RT)

Apologies
Faith Nightingale (FN), Kay Bond (KB), Andrew Thorn (AT) and Sravanthi Sashikumar (SS)

		Action ref
1.	***Apologies for absence***	
	Noted as above.	
2.	***Minutes of the meeting held on 3rd February 2025***	
	The minutes of the previous meeting were confirmed. Previous minutes to have draft watermark and highlighting removed and loaded to website as confirmed minutes**. Action: RT**	***2505-01***
3.	***Matters arising not on the agenda***	
	None.	
4.	***Updates***	
	JR reminded the committee that EAN Congress 2025 will take place 9th-11th June in Manchester and encouraged all to attend. JR also told the committee about the Jonathan Seville Roundtable taking place 28th May to discuss the future of professional registration and encouraged attendance. JR said he has been campaigning for the EPC to have observer status with the National Engineering Policy Centre and is now being invited to events.	

	JR told the committee there has been discussion around the idea of engineers taking an oath. There are a number of draft oaths. JR said this feeds into the discussion of ethics. JR asked the committee if they have a view on this and a view on what the EPC should be doing about it. BG said a conversation around it would be fantastic but the idea of landing on an oath seems disproportionate to value. MS said there are different approaches across the sector so is this something where we can provide resources? AN said he thinks chartership should be streamlined and maintained rather than adding something else. MDB said it would be an interesting conversation but we already have ethics in place so is it needed. JR suggested we arrange an online debate with arguments from both sides. The committee agreed. JR asked the committee for suggestions on proposers and seconders and said he would take it forward, probably in the next academic year. **Action: JR** JR shared a link to an article written by Rhys Morgan (RAEng) regarding a project to embed greater levels of Data-Centric Engineering (DCE) in UK engineering degrees. There is a short questionnaire attached to it which JR encouraged committee members to respond to and share. JR said work has begun on the Complex Systems toolkit in partnership with Quanser and the hope is to launch in the Autumn. JR said the Ethics toolkit has had over 8000 views with the case studies being most popular. JR said toolkits are being widely used. JR mentioned a recent addition being the EDAP toolkit and also the Inclusive Employability toolkit. MS said this shows a return on investment for members. JR said he will see if he can pull together data into a blog or report on toolkit views. **Action: JR**	***2505-02*** ***2505-03***
5.	***All in for Engineering***	
	SF referred to paper EES25/05-02. SF said there has been a huge amount of work in this space. The vision is to have a framework behind which there will be various supporting resources. SF is working on a neuro-inclusive assessment workshop with more details to follow. SF said they are still trying to find funding which Amanda Kirby has agreed to match.	
6.	***Neurodiversity Framework***	
	BG referred to paper EES25/05-03. BG said the framework gathered with other materials will form part of an EDI toolkit. BG asked for comments on the paper. AB said whenever any change/mapping like this comes in the objection from academics is that it is more work to do. AB also said reasonable adjustments for students are clear but not for staff and some staff may find some of the tasks difficult. AN said there should at least be a framework for institutions to measure where they are at. MS said 'normalising difference' – does it need to be more stand alone or more inclusive in its approach? MS said he sees it as part of a continuum rather than being distinct. AB said doing this work creates better programmes for all which is the underlying message. BG asked if there is anything distinct about the engineering world, anything you might expect to see? AB said a variety of assessment is really important. BG asked the committee to get in touch with any further thoughts.	
7.	***House of Lords Autism Committee call for evidence***	
	SF referred to the brief paper included which lists background and a suggestion as to how the EPC might respond. SF said she had a discussion with Anne Nortcliffe and Roger Penlington and would now like support from the committee to respond. Sf asked if we should respond, and if so, should we focus in on work we have already done? AN asked if there is available resource to respond. JR asked what distinctive message we could give the enquiry that they won't get from anywhere else? SF said she is inclined to do something brief and focused. BG and AN offered to look at the draft.	

8.	***OfS Strategy Consultation***	
	SF referred to the meeting papers and thanked MS and GH for their contributions. SF said the response is live on the website.	
9.	***Horizon-scanning and scope of work***	
	JR said he was looking at the grant letter that was pubished yesterday and has had a request to comment on it. SF said there is a consultation by Medr around quality and standards in Wales that the EPC may wish to respond to. SF said she will work with GH on the response.	
7.	***Any other business***	
	None.	
8.	***Date of next meeting***	
	6th October 2025 at 10am.	

Action log

Reference	Agreed Action	By
2505-01	Previous minutes to have highlighting and draft watermark removed and loaded to website as confirmed minutes.	**RT**
2505-02	JR to organise an online debate around 'oaths' in the new academic year.	**JR**
2505-03	JR to look into creating a blog/report on toolkit views to publish on the website.	**JR**

6. TEF Consultation

Introduction

The Office for Students (OfS) launched its consultation on the future of the Teaching Excellence Framework (TEF) in September 2025, with a deadline for responses on 12 December 2025. The proposals mark a significant reshaping of TEF, aligning it more closely with OfS's wider regulatory framework and shifting its emphasis from enhancement towards compliance. Key proposals include integrating TEF with OfS quality assessments, embedding equality of opportunity considerations and linking TEF ratings more directly to incentives and regulatory action.

Highlights:

- The OfS proposes an **integrated and re-shaped TEF** that combines its existing assessment activity with TEF; so every registered higher-education provider will be assessed for quality and outcomes.
- It would continue to publish **provider-level** ratings – to give students clearer information and apply stronger incentives for performance.
- **Equality of opportunity** is explicitly embedded to ensure students from all backgrounds can access high-quality education and positive outcomes.
- The revised TEF would be **cyclical**, with assessment frequency tied to rating and an ongoing **risk-monitoring** process. High-performing providers will face less frequent assessment; those at risk face more scrutiny.
- Initial cycle focuses on **undergraduate provision**; postgraduate-taught assessments are planned for later cycles.
- The OfS is also considering streamlining how **student outcomes** are assessed using available data. They have also proposed removing the progression indicator from Condition B3.
- The regulator signals **stronger incentives / consequences**: published ratings will be linked to incentives, and the regulator may intervene where providers fall below minimum quality requirements. (Press coverage also links these reforms to possible financial consequences for poorly performing providers.)
- the new proposals mark a shift of TEF from being about **enhancement** to being more about **regulatory compliance.** The focus for lower-performing providers (Bronze, Requires Improvement) becomes sharper.

Approach

The 2025 TEF consultation provides an opportunity for EPC to reiterate longstanding concerns about the validity, fairness, and impact of TEF and continue to push for much needed discipline-sensitive reform. The regulatory fit is not good for engineering, not least because the TEF doesn't reflect the nature of engineering education and professional accreditation, the complexity of apprenticeships (and HTQs), and the need for alignment with other regulators.

The priority themes for the EPC to highlight in response to the current consultation are as follows (there are operational observations we could make but that may detract from our core message):

1. Protect subject-level integrity and professional accreditation

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.

Engineering programmes are already tightly coupled to internationally recognised professional accreditation, industrial relevance, hands-on learning, laboratories, placement years, and competency frameworks that are not captured by institution-level metrics or generic student surveys. Professional accreditation needs to be properly recognised in the TEF.

The OfS should ensure the revised TEF permits subject-sensitive assessment and narrative evidence that recognises professionally accredited modes of delivery and practice-based outcomes. For example, “exceptional case statements” could allow engineering departments to explain context (e.g., high cost of labs, cohort heterogeneity, long placement leads).

2. Avoid perverse incentives that reduce diversity

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.

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.

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.

Protect reputational safeguards

Add from questions..

OfS should avoid reductive medal ratings that damage UK engineering’s international standing.

3. Separate inclusion of HTQs, apprenticeships and integrated masters.

OfS has already taken decisions to treat HTQs separately. The EPC supports disaggregating HTQ and degree-apprenticeship outcomes from standard degree outcomes.

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.

4. **Metric validity & transparency (don't collapse to blunt indicators)**

A metrics reform is urgently needed. OfS should move away from blunt proxies (satisfaction, continuation, salary); and adopt robust, discipline-relevant indicators and contextual narratives.

TEF risks misrepresenting engineering teaching context. Metrics must accurately represent learning and employability outcomes (and be robust to small cohorts and dilution by vocational HTQs/apprenticeships). The TEF metrics do not fully capture learning quality, skills development, professional readiness, and student experience.

Any outcome indicators used in TEF must control for factors such as student entry qualifications, sociodemographic background, mode, course length and industrial placement years. Entry tariff or prior attainment could be as control variables allowing for the inclusion of "value-added" or progress metrics.

5. **Qualitative evidence concerns**

Qualitative evidence (industry engagement, placement quality, capstone projects, professional skills development) is essential in engineering and will require engineering experts (engineering academics or industry) on TEF panels when assessing engineering programmes.

The TEF should review the quantitative metrics and support these with evidence of authentic student experience: placement quality, employer assessment of graduate competence, and evidence of student development on professional skills.

Allowing for a balanced weight for narrative submissions (case studies, employer validation, student reflections) is necessary in engineering education, where project-based learning, capstone and group work are core.

Risk to small / specialist Engineering providers. Small/specialist engineering departments may lack large central teams to compile submissions.

Engineering often has small cohort subjects [data] where cohorts are small or heterogeneous (e.g., specialist MSc, sandwich cohorts) contextualisation is needed.

Engineering tends to have higher cost teaching elements (labs, workshops, equipment), project work, placements, field trips. These may lead to higher variation, occasional disruptions (equipment failure, lab closure, etc.). Without narrative or qualitative explanation, outcome metrics may penalise such disruption unfairly.

Opportunities:

In addition to drafting a response to the consultation, of note are some clear gaps in the current discourse and opportunities on which the EES committee can support outsized EPC impact:

- **The need for subject nuance or disciplinary benchmarking**: commentary on separate benchmarks / adjustments needed in relation to engineering. JR is currently drafting a position/opinion piece in relation to TEF, which needs reconsideration in light of the new proposals.
- **Case studies from engineering departments**: I can't find any published pieces presenting data / narratives from engineering programmes about how prior TEF (or B3 outcomes) affect them. Internal case studies from member might strengthen the EPC response. Note that Engineering tends to score well in the OfS metrics, so the focus would probably need to be on higher performing Engineering departments in lower performing TEF providers. Some desk research would be needed on available data.
- **Explicit commentary on integrated MEng under TEF 2025**: 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. That is a strategic gap and one will can advocate for in our networks. It would be possible to discuss this in the above opinion piece.
- **Accreditation and employer feedback**: commentary from engineering professional bodies is pretty absent. The EPC should continue to influence the Engineering Council to they respond independently of the EPC including clear PEI expectation that accreditation frameworks are properly accounted for in the TEF. NEPC should also be encouraged to make a response including an engineering employer perspective.

Actions

The committee is asked to:

- Note the provided review of the consultation and initial thoughts on a response.
- Note the consultation deadline of 12 December 2025.
- Review the TEF proposals and agree an approach to developing the outline EPC response below (see Appendix).
- Advise on the need for and format of full consultation with members (see the EPC consultations policy).
- Consider and advise on the wider impact strategies outlined above, particularly the appetite for and value of inviting provider examples.

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Appendix: Outline question responses

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

We support integration of regulatory functions only if this reduces duplication. Previous TEF cycles demonstrated high administrative cost and distraction from teaching, where burden has consistently outweighed benefit. This should include proportionate requirements for small/specialist providers. A "collect once, use many times" principle should apply.

However, 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.

Engineering degrees are commonly accredited by Professional Engineering Institutions (PEIs) under the auspices of the Engineering Council, where "outcomes", or skill levels, are defined externally. Considering this in judging outcomes (e.g. how many graduates are in roles that match engineering competence vs just "employed") is more meaningful than broad outcome measures. There is no recognition in the consultation that TEF, like the B3 conditions, is at not aligned with professional accreditation.

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

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.

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 (can we get information from NMITE, TEDI or Dyson here in what it would mean?).

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." (Again, ask the APs).

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

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 disaggregate 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

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

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 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

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.

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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.

Stella Fowler, Policy and Research Director
2nd October 2025