

## Annex H: TEF Technical Consultation – Response Form

Name/Organisation:

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

|                                     | Respondent type   |
|-------------------------------------|---|
| <input type="checkbox"/>            | Alternative higher education provider (with designated courses)                                     |
| <input type="checkbox"/>            | Alternative higher education provider (no designated courses)                                       |
| <input type="checkbox"/>            | Awarding organisation   |
| <input type="checkbox"/>            | Business/Employer   |
| <input type="checkbox"/>            | Central government  |
| <input type="checkbox"/>            | Charity or social enterprise  |
| <input type="checkbox"/>            | Further Education College   |
| <input type="checkbox"/>            | Higher Education Institution  |
| <input type="checkbox"/>            | Individual (Please describe any particular relevant interest; parent, student, teaching staff etc.) |
| <input type="checkbox"/>            | Legal representative  |
| <input type="checkbox"/>            | Local Government  |
| <input type="checkbox"/>            | Professional Body   |
| <input checked="" type="checkbox"/> | Representative Body   |
| <input type="checkbox"/>            | Research Council  |
| <input type="checkbox"/>            | Student   |
| <input type="checkbox"/>            | Trade Union or staff association  |
| <input type="checkbox"/>            | Other (please describe)   |

### Question 1 (Chapter 1)

Do you agree with the criteria proposed in Figure 4?

Yes       No       Not sure

Please outline your reasons and suggest any alternatives or additions.

The HEA agrees with the description of the three aspects of teaching excellence, the criteria for each and the comments to be reflected in Panel member guidance. We would propose

- adding a reference to the Higher Education Achievement Report to the 'comments' under Student Outcomes and Learning Gain as we feel it captures the extra- and co-curricular activities undertaken by students (**see also response to Question 8**)
- adding a more explicit reference to staff with accredited higher education teaching qualifications (e.g. HEA Fellowships, PG Certificate in Academic Practice) as these courses explore with staff how students learn and how more effectively to engage them in their learning. Current research work undertaken by HESA, HEFCE and HEA will ensure that the institutional returns to HESA on the teaching qualifications of staff who teach or support learning are more robust in the future. This would be helped by greater emphasis in the TEF.

### Question 2 (Chapter 3)

A) How should we include a highly skilled employment metric as part of the TEF?

There is a danger that this will be another crude proxy of teaching excellence. For example, many areas of employment require apparently low-level work experience before graduates can move into 'highly skilled' employment. The limited availability of highly-skilled jobs in economically depressed areas of the country will have to be borne in mind. We appreciate that statisticians can control for these and other factors affecting access to such employment, but we stress the need for careful design and testing of the Longitudinal Educational Outcomes (LEO) dataset.

B) If included as a core metric, should we adopt employment in Standard Occupational Classification (SOC) groups 1-3 as a measure of graduates entering highly skilled jobs?

Yes       No       Not sure

C) Do you agree with our proposal to include all graduates in the calculation of the employment/destination metrics?

Yes       No       Not sure

Please outline your reasons and suggest any alternatives.

### Question 3 (Chapter 3)

A) Do you agree with the proposed approach for setting benchmarks?

Yes                       No                       Not sure

B) Do you agree with the proposed approach for flagging significant differences between indicator and benchmark (where differences exceed 2 standard deviations and 2 percentage points)?

Yes                       No                       Not sure

Please outline your reasons if you disagree.

### Question 4 (Chapter 3)

Do you agree that TEF metrics should be averaged over the most recent three years of available data?

Yes                       No                       Not sure

Please outline your reasons and suggest alternatives.

We agree with the averaging TEF metrics over three years but assessment panels need to be advised to take note of significant variations, which might be caused by changes in government policies or economic or social factors. Providers should be advised to draw attention to these in their commentary on their metrics.

We remain concerned that the core metrics are inadequate proxies for teaching excellence and vulnerable to gaming, but we understand the need to rely on them in the short term. We strongly advise in these circumstances that assessment panels are encouraged to give equal weight to the provider submission as to the metrics.

### Suggestion:

We suggest that the use of the UK Engagement Survey as a metric for teaching excellence be explored. Though the revised NSS (to be piloted shortly) includes some engagement-type questions, we do not believe that it will be sufficient to meet the requirements of the TEF. Institutions and students will not welcome an additional survey, so we suggest that the UKES (amended if need be) be developed as a replacement for the NSS. **(See also response to Question 8)**

**Question 5 (Chapter 3)**

Do you agree the metrics should be split by the characteristics proposed above?

Yes       No       Not sure

Please outline your reasons and suggest alternatives.

**Question 6 (Chapter 3)**

Do you agree with the contextual information that will be used to support TEF assessments proposed above?

Yes       No       Not sure

Please outline your reasons and suggest any alternatives or additions.

**Question 7 (Chapter 3)**

**A)** Do you agree with the proposed approach for the provider submission?

Yes       No       Not sure

**B)** Do you agree with the proposed 15 page limit?

Yes       No       Not sure

Please explain your reasons and outline any alternative suggestions.

**Question 8 (Chapter 3)**

Without the list becoming exhaustive or prescriptive, we are keen to ensure that the examples of additional evidence included in Figure 6 reflect a diversity of approaches to delivery. Do you agree with the examples?

Yes       No       Not sure

Please outline your reasons and suggest any additions or alternatives?

We largely agree with the examples provided, but please see comments on each aspect of teaching excellence below.

**Aspect: Teaching Quality**

We welcome:

- the inclusion of the UK Engagement Survey (UKES) as we believe that it gets much closer to assessing pedagogic practice than the NSS metric on teaching quality and therefore is a more robust measure of teaching excellence;
- the inclusion of reward and recognition schemes based on teaching quality and on teaching qualifications of staff.

We are uncertain about:

- using feedback from **external examiners** in the future. Whilst the HEA is fully committed to supporting improvement of the training of external examiners, it is concerned that using their feedback as a measure of excellence might add to the pressure on external examiners (derived from existing league tables) to inflate marks and might thereby undermine efforts to ensure the reasonable comparability of academic standards.

We propose:

- the inclusion of a measure on the impact of **continuing professional development** as HEA-accredited CPD schemes ensure that staff are exposed to the theory and practice of how students learn and how to engage them effectively in their learning. Independently verified research undertaken by the HEA has established a clear and statistically significant link between HEA Fellowships (the result of successful completion of accredited training) and strong scores in student engagement reported by UKES.

<https://www.heacademy.ac.uk/about/news/new-research-finds-link-between-high-levels-hea-fellowship-and-strong-ukes-teaching>

### **Aspect: Student Outcomes and Learning Gain**

We welcome:

- the inclusion of **Grade Point Average** as one means of the measuring and recording student progress.

We propose:

- the inclusion of reference to the **Higher Education Achievement Report** (HEAR) as it captures the experience and skills developed as a result of not just the academic but also verified co-, or extra-, curricula activities undertaken by students. Used effectively this serves as an important vehicle for discussions between students and tutors of skills development and skills gaps and promotes student self-efficacy and self-advocacy – both critical to student success in their careers.

The Green Paper noted that ‘the adoption of the Higher Education Achievement Report is an important development and will help provide students and employers with richer information, *but this work needs greater urgency.*’ (emphasis added) Inclusion of a reference to the HEAR would elicit examples of excellent practice in its use and encourage others to adopt it (or an equivalent).

#### Question 9 (Chapter 4)

A) Do you think the TEF should issue commendations?

Yes       No       Not sure

The HEA in its submission to the Green Paper consultation argued for the use of ‘distinctive standing’ as a way of differentiating institutions (and as a way of avoiding 3 or 4 hierarchical excellence ratings) and suggested some of the areas of possible commendation proposed in the Technical Consultation.

However, we feel that

- the use of commendations in addition to the three proposed ratings will unduly complicate *both* the application process (providers might target their submissions on securing a commendation; commendations might be perceived to be a greater value than the rating) *and* the assessment process (areas of potential commendation could themselves be evidence of what distinguishes between institutions which are excellent and outstanding). This is a particular problem given the current lack of definition of the TEF ratings above ‘meets expectations’ (**see response to Question 12**)
- some of the proposed areas of commendations mentioned do not generally relate to *institution-wide* provision (e.g. part-time provision and/or distanced learning)
- commendations might be more appropriately used in the assessments at disciplinary level. Excellent practice, for example, in assessment and feedback or in placement learning might be more clearly identifiable at discipline level than across the whole of a large institution. Commendations for particular aspects of disciplinary practice would be of immediate value to prospective students, who are looking for evidence of subject quality.

B) If so, do you agree with the areas identified above?

Yes       No       Not sure

Please indicate if you have any additional or alternative suggestions for areas that might be covered by commendations.

As noted above, some of the possible commendations might be useful as evidence of institution-wide excellence (e.g. support, reward and recognition for teaching staff), others are not (e.g. evidence of business engagement, distanced learning). It might be advisable therefore to reserve the use of commendations for discipline-level assessment or at least to use only those commendations which apply to institution-wide provision in TEF Two.

**Question 10 (Chapter 4)**

Do you agree with the assessment process proposed?

Yes       No       Not sure

Please outline your reasons and any alternative suggestions. The proposed process is set within a relatively tight timescale, reflected in the key dates included in Annex B. Responses should be framed within this context.

**Question 11 (Chapter 4)**

Do you agree that in the case of providers with less than three years of core metrics, the duration of the award should reflect the number of years of core metrics available?

Yes       No       Not sure

Please outline your reasons.

We do not agree as

- This might mean those providers with one year's of core metrics having to go through the process three years in a row
- The assessment would be more robust (and consistent), if providers were eligible only when they had three years of core metrics

**Question 12 (Chapter 5)**

Do you agree with the descriptions of the different TEF ratings proposed in Figure 9?

Yes       No       Not sure

Please outline your reasons and any alternative suggestions.

**Whilst we agree with the idea of three ratings, we have significant concerns about the terminology and the description of the TEF ratings.**

**1. Terminology**

*Concern:*

- The terms 'excellent' and 'outstanding' are synonyms and the difference may be difficult for the stakeholders and assessment panels to distinguish.

*Proposal:*

- Ratings of 'meets expectations'; 'excellent'; 'exceptional'. This phrasing allows one to distinguish more clearly between the awards.
- However, this and any other terminology will not enable assessment panels to make a judgment and for the sector (and other stakeholders) to understand the judgment without appropriate descriptions of the ratings.

## 2. Rating descriptions

*Concerns*

- The current descriptions provide no explanation of why a provider rated 'outstanding' is different from one rated 'excellent'. This will make it extremely difficult for assessment panels to make a judgment and for the sector (and other stakeholders) to understand the judgment.

*Proposals*

- That the description 'meets expectations' stands as it conveys the current high quality assessment threshold
- That the other two ratings be 'excellent' and 'exceptional' as the terms are more easily distinguishable
- That consideration is given to the following **impact measures** which might be applied in the assessment of each of the three aspects of teaching excellence<sup>1</sup>

### a. Impact measures

- **Reach** of provision – the extent to which the policy or practice or innovation is embedded within a department or faculty/school or across the whole institution/sector/internationally
- **Evaluation** - the extent to which impact of the policy or practice or innovation on student learning outcomes has been evaluated and action taken in response to the evaluation
- **Recognition** – level of recognition of the policy or practice or innovation or of leadership in a particular field (local/ national, international awards/citations)

---

<sup>1</sup> These have not been illustrated with possible examples of additional evidence from those listed in the Technical Consultation, in part because of the danger of producing a checklist and, in part, to encourage the submission of other evidence of excellence by providers.

- **Value** – the contribution of the policy or practice or innovation to improving learning student outcomes (satisfaction/retention/employment or further study based on the current core metrics)

In tabular form, this would look like this:

| <b>Impact measure</b> | <b>Institutions rated 'meets expectations'</b>   | <b>Institutions rated 'excellent'</b>   | <b>Institutions rated 'exceptional'</b>   |
|-----------------------|--|---|---|
| Reach                 | Introduced within faculty/institution  | Implemented within faculty/institution  | Embedded across the whole institution and implemented sector-wide/ internationally                    |
| Evaluation            | Not yet evaluated  | Partially evaluated   | Fully evaluated and changes in policy or practice implemented.  |
| Recognition           | No recognition yet   | Local (within department/institution)   | National/international reference  |
| Value                 | Positive impact on student learning outcomes (on metrics, meets institutional benchmark) | Significant impact on student learning outcomes (on metrics, exceeds institutional benchmark) | Major impact on student learning outcomes (on metrics, significantly exceeds institutional benchmark) |

#### **b. Rating descriptors:**

We have not supplied a rating descriptor for 'meets expectations' as it needs to equate with a successful 'Quality Assessment' which is currently wider than teaching excellence. We would be willing to work with BIS on such descriptor for 'teaching excellence' on request.

Below, we suggest descriptors for the ratings 'excellent' and 'exceptional' on the basis of the three aspects of excellence in the Technical Consultation, deliberately presented here in a way which highlights the difference in level of performance required by each rating. These can easily be re-presented as consolidated descriptors at each level.

**i. Institutions rated 'excellent' on Teaching Quality will have:**

- a leadership , strategy and ethos which promotes and values teaching excellence through continuous professional development
- embedded innovative ways in which teaching stimulates and challenges and encourages students to engage,
- courses in which the curriculum, assessment and standards are academically rigorous and effective in stretching students to develop knowledge, skills and attributes to a high level

**Institutions rated 'exceptional' on Teaching Quality will have:**

- a leadership, strategy and ethos which promotes and values teaching excellence. It will have implemented fully policies which recognise and reward excellent teachers and have demonstrated that staff are fully engaged in their own continuous professional development
- embedded innovative ways in which teaching stimulates and challenges and encourages students to engage. It will have an established culture of partnership between staff and students in learning and teaching
- courses in which the curriculum, assessment, feedback and standards are academically rigorous and effective in stretching students to develop knowledge, skills and attributes to an exceptionally high level

**ii. Institutions rated 'excellent' on Learning Environment will have:**

- learning resources which effectively support students' learning and aid the development of independent study and research skills
- a learning environment in which linkages are identified and utilised between teaching and scholarship, research or professional practice (as appropriate)
- student progression and success is achieved through personalised and individual support throughout the student lifecycle

**Institutions rated 'exceptional' on Learning Environment will have:**

- learning resources which effectively support students' learning and aid the development of independent study and research skills and which have been fully evaluated and disseminated across the institution
- a learning environment in which the exploration of linkages between teaching and scholarship, research or professional practice are embedded in business and professional engagement (as appropriate), student engagement and staff development

- demonstrated an exceptional record of student progression and success as a result of personalised and individual support throughout the student lifecycle

**iii. Institutions rated ‘excellent’ on Student Outcomes and Learning Gain will have:**

- equipped graduates with the knowledge, skills and attributes that have allowed significant numbers to progress successfully to employment or further study
- facilitated the development of students’ personal and transferable skills in the academic or co-curricular activities
- demonstrated a significant record of success in ensuring positive outcomes for students from all backgrounds

**Institutions rated ‘exceptional’ on Student Outcomes and Learning Gain will have:**

- equipped graduates with the knowledge, skills and attributes that have allowed very significant numbers to progress successfully to employment or further study
- fully embedded and evaluated the development of students’ personal and transferable skills in the academic, co-, or extra-curricular activities
- demonstrated an outstanding record of success in ensuring positive outcomes for students from all backgrounds

**The HEA would be happy to work further with BIS on the rating descriptors.**

**Thank you for taking the time to let us have your views.**

We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would you be happy for us to contact you again from time to time either for research or to send through consultation documents?

Yes

No