

# Independent Review of the TEF

## Consultation Response

This is NUS's draft response to the Independent Review of the TEF's [Call for Views](#). The Independent Review of the TEF looks at every aspect of the Teaching Excellence Framework. It is our chance to make a framework that works for students.

### The Independent Review

The Independent Review of the Teaching Excellence Framework was won by students' unions and NUS in 2017 as part of our lobbying on the Higher Education and Research Act.

It looks at every key area of the TEF and has the scope to change it significantly – from the metrics used to the names of the ratings. There is also the chance for students' unions to change the way they engage with the TEF.

The Call for Views consultation closes on **March 1<sup>st</sup>**. This is our draft response to it and should be read alongside the [original document](#). We have released [a key points briefing](#) for students' unions which will help you submit your own response.

### Influencing the Independent Review

As well as submitting a written response, there are two events for students' unions to feed in to the consultation.

NUS is hosting an **APPG on Students** on the TEF Review on the morning of **February 26<sup>th</sup>** in Westminster. Students' unions will be able to hear from the Review Chair and lay out their priorities to her. You should [email us](#) to register.

On **March 8<sup>th</sup>**, we will host a **Listening Session** in Leeds with the Department for Education, which will involve discussion of the key themes of the review. Further details are available through the [registration page](#).

### Key dates

- **March 1<sup>st</sup>**: Written consultation closes
- **March 8<sup>th</sup>**: [Consultation event](#) for students' unions, Leeds
- **March 13<sup>th</sup>**: [Consultation event](#) for students' unions, London

### Answering the Call for Views

#### General Approach

NUS does not believe there is opposition to a national framework which assesses teaching excellence, but there is significant concern with the TEF in its current format.

For NUS and students' unions, this review is a chance to shape a future framework for teaching excellence which moves away from competition and is rather a tool for enhancement and information. It is not about making the current TEF more palatable.

## Consultation Response

Please note: there is a 250 word limit for each answer. Questions 1 – 9 cover your details and the consultation begins on question 10. You can submit your response [online here](#).

### Q10. Do you support the aim of assessing the quality of teaching excellence and student outcomes across providers of higher education?

**Yes**

*Note: This is a simple yes/no question, and so we have included an explanation for this answer in Q16.*

### Q11. The Government has stated that the purpose of the TEF is to:

- better inform students' choices about what and where to study;
- raise esteem for teaching;
- recognise and reward excellent teaching; and
- better meet the needs of employers, business, industry and the professions.

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

**Which of these is the most important (select one option only)?**

- Providing information
- Enhancing provision
- Both are equally important

#### Enhancing Provision

We would want to see a framework which assess teaching excellence move away from a metrics-driven methodology.

It should move towards a framework which showcases best institutional practice, enhances provision and collaboration between institutions, and considers the assessment of excellence in an institutional context.

It is vital that any framework which aims to assess excellent teaching has enhancement at its heart. It should be structured to ensure that

institutions are incentivised to enhance their provision from the ground up, rather than purely enhancing their performance in metrics.

Currently, as it is openly admitted that each metric is a proxy for teaching quality, the student information function of the TEF cannot be fulfilled. Students assume that they are being given information on an institution's teaching quality, when in fact it is more accurate to say they are receiving information on an institution's NSS scores and graduate employment prospects. There are further problems with the latter, given that the LEO dataset has a time lag of up to ten years, and does not account for the self-employed.

The student information function carries a further issue of attempting to provide impartial student information with a highly politicised method. In the current education system, universities compete to perform better in rankings and league tables, and the TEF currently is a key part of this, therefore the information it presents can be skewed by these attempts to 'game' the system.

### 12. Should there be any other purposes for TEF?

The core purposes of a framework which assessed teaching quality should be to enhance provision.

### Q13. Are the criteria used in TEF (see Figure 1 for a list of the criteria) appropriate?

**If not, what criteria would be more appropriate?**

Moving towards a framework which enhances and assess teaching quality would mean changing the metrics that feed into it. To change the metrics, the focus of the criteria will have to shift, and the suggestions here should be the start of developing them in conversation with students' unions and the higher education sector.

#### The current criteria

- Teaching Quality

Assessment of teaching quality, and incentivising enhancement is paramount. A focus on teaching quality should run through the exercise. In principle, this is a suitable criterion, but currently it is only informed by NSS results. This means it is showing students' perceptions of teaching quality, not attempting to measure teaching quality itself. We have suggested some ideas to rectify this in Q14.

- Learning Gain

Within the current framework, one of the most problematic areas is the focus on graduate employment outcomes. This criterion should focus on learning gain and attainment.

This criterion should take a view of learning gain which is not defined purely by salaries and should look at attainment in the round, including distance travelled, however it should not go so far as to confuse a framework for teaching excellence with a measure of the whole higher education experience.

- Learning Environment

Research with students has shown that the learning environment, including resources, excellent teachers and support are all areas which indicate teaching quality.<sup>1</sup> 94% of students asked in a survey run by a consortium of students' unions said that course resources were very important for their student experience.<sup>2</sup>

In the same survey, 90% said that high quality teachers demonstrated that a university had excellent teaching.<sup>3</sup> In early versions of the TEF, it was proposed that the Learning Environment criterion would be fed from a metric around how many teaching staff were on temporary contracts, and the idea of returning

to this should be explored along with other contextual metrics.

## Recommendations

Students' engagement in their teaching and learning enhances their attainment and the educational experience of them and their peers<sup>4</sup>. Students value a personalised and collaborative relationship with their university as a key part of their experience.<sup>5</sup> Teaching and learning is recommended to be delivered and designed with students as co-creators and partners.<sup>6</sup>

With these things in mind, there should be a thread of student engagement throughout the criteria, both using information gathered from engaging with students, but also evaluating how far students are engaged in their learning.

As the framework moves further towards an exercise focused on enhancement and quality assessment in an institutional context, there should be exploration of criteria and metrics which focus on student engagement and co-production. This criterion should have features which evaluate the amount to which students are treated as co-producers in their courses and the structures which allow them to be a meaningful part of the academic community.

**Q14. 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".**  
**a. Are the metrics used in TEF the best proxies for measuring the TEF criteria (see Figure 1 for a list of the criteria and metrics)?**

<sup>1</sup> <https://studentsunionresearch.files.wordpress.com/2017/11/tef-pr-research-report.pdf>, p9

<sup>2</sup> Ibid.

<sup>3</sup> Ibid.

<sup>4</sup> [https://www.heacademy.ac.uk/system/files/what\\_works\\_final\\_report.pdf](https://www.heacademy.ac.uk/system/files/what_works_final_report.pdf) p.32

<sup>5</sup> <https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/what-students-want-from-their-university.aspx> p10

<sup>6</sup> <https://www.qaa.ac.uk/quality-code/advice-and-guidance/student-engagement>

NUS does not believe that the current set of metrics is fit for purpose, and has made some suggestions in the answer to question 13.

We do not believe metrics which take graduate salaries as a proxy for teaching quality are appropriate, particularly when this data is not contextualised. Neither are those which offer institutions a perverse incentive – for example, holding grade inflation as a contextual metric incentivises universities to mark down their students, for fear of being penalised for not tackling grade inflation.

The framework should also not be used as a silver bullet to tackle all policy questions. NUS has consistently raised concerns about the use of the TEF to respond to media outcry over grade inflation by including it in the contextual metrics.

We have similar concerns about the inclusion of contextual metrics on attainment gaps. While action on attainment gaps is to be welcomed, it is also clear that a metric-based framework which will incentivise superficial solutions is not the place to solve complex policy problems, and it is better to take the nuanced and long term action that they require through other structures. In the case of attainment gaps, we believe that this is best tackled through access and participation work.

We believe that student voice should be at the core of a new framework, however the NSS is an imperfect proxy. There have been numerous questions from the Royal Statistical Society over its validity as a metric, both as an “unstable data source” and something susceptible to institutional gaming.<sup>7</sup>

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

A framework which effectively measured teaching excellence and incentivised improvements should have student voice at its

core, both quantitatively and qualitatively (see Q16).

Any metric which captures student voice should carry the same weight as the others. Currently, the NSS carries a weight of 0.5 in comparison to other metrics; this should be rectified if it remains in the framework. As the NSS is an imperfect capture of the student experience, it should be contextualised by the involvement of student representatives and the opportunity to provide an independent written submission. There is more detail on this proposal in Q16.

Ways of capturing learning gain should be developed to capture the impact of higher education and high quality teaching, however they should not be so broad as to confuse this framework with a proxy measurement for the entire higher education experience.

In research from a consortium of students’ unions, students identified areas such as learning resources, facilities and assessment of the knowledge and skills that they had gained as markers of whether a university had excellent teaching.<sup>8</sup> Thought should be given to how far these can be incorporated into a framework which assesses and encourages enhancement of areas which contribute to excellent teaching.

As the framework moves towards an assessment of quality in an institutional context, with a focus on enhancement, there should be thought given to how co-production and treating students as partners can be captured in a national framework while also reflecting a diversity of excellent provision.

**Q15. 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**

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<sup>7</sup> <https://www.theguardian.com/higher-education-network/2018/jun/01/awarding-university-subjects-gold-medals-is-deeply-flawed>

<sup>8</sup> <https://studentsunionresearch.files.wordpress.com/2017/11/tef-pr-research-report.pdf> p9

**student intake (see that 'What is TEF?' section for detail).**

**a. Should the metrics be benchmarked to allow for difference in a provider's student population?**

**b. Does TEF benchmark for the right factors?**

The metrics should continue to be benchmarked, however this benchmarking should not simply be a recognition that education is currently unequal – it should further incentivise institutions to enhance their teaching and provision and develop equity of opportunity. **Q16. 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?**

Currently, the HEI puts in a written submission to contextualise their metrics and highlight any other activity which they believe contributes to teaching excellence. NUS believe that the same opportunity should be afforded to students' unions: to submit a written statement independently of the institution which comments on teaching excellence.

NUS consulted students' unions from across England and Wales, from a range of provider types and union sizes, and found there was consensus that there should be a way for unions to feed back to OfS on their institution's performance, independently of the institutional statement in the TEF.

This statement should be qualitative and should hold an equal weight to the institutional statement. It should stand alone from the institutional submission and not just be instructed to be a commentary on it, to give the opportunity to showcase teaching excellence and the factors that go into it.

It should be delivered at an institutional level, as this would allow the option for commentary on institution-wide trends, and also for unions to consult with their own representative structures to highlight particular areas of

concern or note, as well as focusing on areas of value to them. It should sit alongside and compliment other areas of student submission, for example to access & participation guidance, however it is also critical that, should a students' union choose to constructively disengage from a statement, this is respected by the institution and OfS

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

**Question 10**

As there was no space given to comment, we would like to include our rationale here. We do not believe there to be opposition to the concept of a national framework which comments on teaching quality and has the core aim of enhancement. This does not mean that NUS endorse the Teaching Excellence Framework in its current form, and we have laid out our concerns both in this document and elsewhere.

**The link to fees**

It is understood that the plans to have the TEF linked to tuition fees and allow institutions to raise their fees by varying portions of inflation depending on their results is no longer a proposal, however we would welcome confirmation that this is the case.

**The name: Teaching Excellence and Student Outcomes Framework**

The TEF became known as the Teaching Excellence and Student Outcomes Framework in 2017 to reflect the focus on student outcomes. NUS would like to see the focus of the framework turn away from outcomes and into enhancement and quality, therefore consideration should be given to at minimum removing "Student Outcomes" from the name, if not changing the name entirely.

**Q17. Are the purpose(s) of TEF met by:**

**a. awarding a single rating?**

**b. with three levels of differentiation, plus a fourth rating for those unable to be assessed?**

**Unsure**



There is a concern that there is not enough differentiation within the ratings. When any framework has an arbitrary three categories, there will always be a tendency to grow the middle rating. Whether three ratings are suitable should be re-examined and be led by the design of the new framework, rather than creating a framework to necessarily feed three different ratings.

**c. ratings named Gold, Silver, Bronze and Provisional?**

**No**

**Q18. If you answered no, what alternatives you would suggest: a. For provider-level TEF?  
b. For subject-level TEF?  
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.**

A framework which reflects teaching excellence and encourages enhancement should have names which are not reductive and do not encourage competition. There should be clear descriptors, so that there is a common understanding of what each rating means.

As suggested in Q17, there should be the opportunity, when moving the framework away from competition and towards enhancement, to reconsider the amount of ratings needed. This should be led by the design of the framework, rather than the framework being designed to fit three ratings.

**Q19. Has the introduction of TEF positively changed the educational experience of students (e.g. teaching and learning)?**

Local students' unions are best placed to comment on this in their contexts.

NUS would argue that the TEF has had a predominately negative effect on teaching enhancement (Q20) and has not fulfilled its student information piece, given only 19% of applicants showed an awareness of it according to research conducted by UCAS.<sup>9</sup>

**Q20. Has the introduction of TEF negatively changed the educational experience of students (e.g. teaching and learning)?**

Nationally, we do not believe that the TEF in its current form has had a positive impact on teaching & learning, however for individual case studies we defer to local students' unions.

We have significant concerns about the TEF's place in the current policy landscape as a further policy lever to encourage competition between institutions, rather than collaboration, and believe that the incentives to game metrics are detracting HEIs from improving their teaching, rather focusing on how best to perform in the metrics and are aware of specific instances of this from students' unions.

For example, we have heard from one students' union, involved in their institution's pilot project, of the HEI discussing where best to move lower-rated subjects so as to not feel their impact on the overall TEF rating.

**Q21. Has the introduction of TEF impacted positively on research and/or knowledge transfer?**

NUS is not answering this question.

**Q22. Has the introduction of TEF impacted negatively on research and/or knowledge transfer?**

NUS is not answering this question.

**23. Does TEF help you as a student/student union/provider/employer/other? Please explain the reasons for your answer.**

shows-growing-awareness-tef-among-applicants-higher-education

<sup>9</sup> <https://www.ucas.com/corporate/news-and-key-documents/news/ucas-analysis->

If developed further and implemented correctly, we do believe that an assessment framework for teaching excellence could be a powerful tool for students' unions, particularly when focused on enhancement.

A focus on enhancement will go further to redressing the perceived imbalance between research and teaching across the higher education sector, as well as looking at excellence and enhancement in an institutional context.

If supplemented by a student written submission and built on the premise that the student voice, however critical, should be central to the framework, then this could redress the power imbalance between students' unions and their institutions.

**Q24. Explaining your reasoning, what are the most significant costs of:**

**a. Provider-level TEF?**

**b. Subject-level TEF?**

NUS is not submitting an answer to this question.

**Q25. Explaining your reasoning, what are the most significant benefits of:**

**a. Provider-level TEF?**

**b. Subject-level TEF?**

NUS is not submitting an answer to this question.

**Q26. Are there particular types of students, provision or providers that are disadvantaged by the current design of TEF, in a disproportionate way?**

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

Currently, the TEF disadvantages significant groups of students and providers.

National research from students' unions has shown that there are groups of students who believe that a Gold-rated institution is 'not for

them.' 11% of Black students said that they would have reconsidered applying to their universities if they had been rated Gold, in comparison to 5% of white students.<sup>10</sup>

NUS and students' unions have voiced concerns throughout the development of the TEF that a reliance on LEO data will disadvantage students who come from demographics which are less likely to enter high-paying employment immediately upon graduation due to gendered and racialised pay gaps, as it disincentivises HEIs from recruiting them.

A new framework which measured teaching excellence and incentivised enhancement has to move away from the use of salary data as a proxy for teaching excellence.

Not only does this disadvantage groups of students and providers, but there is also no direct link between teaching quality and salaries, given the varied social factors which effect a student's future earnings. Therefore, even if the use of LEO data did incentivise enhancement over competition and gaming recruitment, it would still not necessarily incentivise improvements to teaching and facilities, but more likely would incentivise careers advice and recruitment information. While information, advice and guidance is vital for students, it is a piece of work for universities which sits apart from teaching and learning.

To rectify this, there should be a greater focus on learning gain and co-production, moving away from the use of graduate outcomes as understood through salary data as a core metric.

**Q27. Are there particular types of students, provision or providers that are advantaged by the current design of TEF, in a disproportionate way?**

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<sup>10</sup>

<https://studentsunionresearch.com/2017/11/09/48/> p4

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

Those providers who have the resource to rearrange their internal processes and quality departments in line with TEF processes will always have the advantage over smaller providers. Smaller providers must then choose between resourcing their provision and resourcing their TEF submission. A focus on enhancement, where providers were rewarded for their own enhancement rather than just chasing results and ratings, would go some way to address this.

### **What next?**

- Prepare a response to the Call for Views using this guide, or work with your institution to feed into theirs, before **March 1<sup>st</sup>**.
- Attend the consultation event on [March 8<sup>th</sup>](#) or on [March 13<sup>th</sup>](#)
- Get in touch with any questions to [hannah.sketchley@nus.org.uk](mailto:hannah.sketchley@nus.org.uk)