Teaching Excellence and Student Outcomes Framework – subject level TEF consultation response

The current Teaching Excellence and Student Outcomes Framework (TEF) assesses ‘provider-level’ undergraduate provision. There is an intention to extend this to a disciplinary (subject) level from 2020.

Stakeholders were offered an opportunity to respond to a consultation on how subject-level assessment should be carried out. Due to the technical nature of the consultation and the short timescale available there was limited time to prepare a response. The attached paper details the response submitted on behalf of City, for information.

Educational Quality Committee is asked to note the consultation response
Introduction

i What is your name?

Name:
Emily Thornton

ii What is your email address?

Email:
Emily.Thornton.2@city.ac.uk

iii I am a:

Publically funded higher education provider

Please state:

iv If applicable, what is your organisation’s name?

Organisation:
City, University of London

v Would you like us to keep your responses confidential?

No

Reason for confidentiality:

Subject classification system

1 To define ‘subjects’ in subject-level TEF, do you:

No - disagree

If you answered No, what other systems could be used and why?:

Yes

If you answered Yes, please explain why:.

A different structure would be preferable. It is key to note that the 35 subject groupings are very broad in scope. CAH2 does not provide sufficient granularity to support meaningful decision making by prospective students. In many cases, students will need to refer to multiple ratings for some degree choices.

Duration of award

2 Do you agree that we should have a longer duration and re-application period in subject-level TEF?

No - disagree

The focus of this question is on whether we should extend the duration. However, please provide as much detail as you can on your preferred length for the duration and/or re-application period.

There is a balance between the data being relevant (timeliness is a key part of this) and the practicalities and burden of data collection. The proposed extension to five or six years between reassessments is simply too great a time lag for the awarded TEF rating to be reliable as it may reflect an assessment made several years previously (taking into account the time between the rating being awarded and publication). There could be little confidence in the data and it would not reflect current performance for prospective students. A longer duration and re-application period could mean in practical terms that there would be no way for potential students to know that the data used for the rating reflected an issue since addressed. This would not reward progress made in improvements to influence student choice. The HE sector is moving away from annual data collection towards in-year. The data collection that will be necessary under subject-level TEF should not act contrary to this development. We suggest keeping the current 3 year cycle (assessing data from previous 3 academic years) or the adoption of a rolling assessment cycle to spread the burden of reporting in future.

Overview of subject-level TEF design
3 Should subject-level TEF retain the existing key elements of the provider-level framework (including the 10 TEF criteria, the same suite of metrics, benchmarking, submissions, an independent panel assessment process and the rating system)?

Yes - agree

If you answered No, please explain why:

4 For the design of subject-level TEF, should the Government adopt:

A ‘by exception’ approach (ie a form of Model A)

Please explain your answer. When answering this question, please consider the underlying principles that define Model A (a ‘by exception’ approach) versus model B (a ‘bottom up’ approach), and which principle you think we should adopt for subject-level TEF. While we are also interested in detailed comments on the specific design of each model, the final design will likely be a refined version of those presented in the consultation document. This question is therefore seeking views about which underlying approach you prefer. In your response, you may wish to consider the evaluation criteria set out in the specification for the first year of pilots (see below):

Overall we consider that Model A (‘by exception’) should be adopted. When taking into account the evaluation criteria, on balance, this would be less administratively burdensome and would deliver better value for money. A loop-back to provider-level is required as subject-level ratings do not inform the provider-level rating and there should be a connection between the two.

We maintain that the CAH2 does not provide sufficient granularity for students to make informed choices. It is also unknown how much emphasis applicants will place on TEF subject outcomes in making their choices.

Model A: Generating exceptions

5 Under Model A, do you agree with the proposed approach for identifying subjects that will be assessed, which would constitute:

Yes - agree

If you answered No, please explain why. You may wish to comment on variations or options that we have not mentioned:

Yes - agree

Please explain your answer. You may wish to comment on options for identifying the number of additional subjects or on any variations or options that we have not mentioned.

Model A: Relationship between provider and subject assessment

6 In Model A, should the subject ratings influence the provider rating?

Yes - agree

Please provide as much detail as you can on why and how this relationship should be brought about.

Model B: Relationship between provider and subject assessment

7 In Model B, do you agree with the method for how the subject ratings inform the provider-level rating?

No - disagree

You may wish to comment on the method for calculating the subject-based initial hypothesis, as well as how this is used in the assessment process. We also welcome alternative approaches that do not use the subject-based initial hypothesis:

We are concerned that the provider-level rating is determined by the number of students taking a subject rather than based on teaching quality of provision.

Metrics

8 Do you agree that grade inflation should only apply in the provider-level metrics?

No - disagree

If you are able, please provide information about how grade boundaries are set within institutions to inform whether our rationale applies consistently across the sector. Comments on the potential impacts of applying grade inflation only at provider-level are also welcome:

Measuring grade inflation does not ‘fit’ with the aims and objectives of TEF. It remains unclear how students will benefit from this information at provider or subject level and may instead cause confusion.

9 What are your views on how we are approaching potential differences in the distribution of subject ratings?

You may wish to comment on our approach to very high and low absolute values, clustered metrics and regulation by Professional, Statutory and Regulatory Bodies (PSRBs):

Inclusion of very high and very low performance indicators is of value but it should be made clear how these will be taken into account by the assessment panel given that these are not linked to the ‘flagging’ system.
10 To address the issue of non-reportable metrics:

Yes - agree

If you answered No, please explain why.: rely on provider metrics alongside any reportable subject-level metrics?

Please explain your answer.: Additional Evidence

11 Do you:

Yes - agree

If you answered No, please explain why.: Yes

Please outline which subjects should have mandatory declaration and why.: We agree with the proposal that this is not compulsory evidence at least for the first few years although for PSRB accreditation, there could be more of an argument for making this mandatory. Subject benchmarks are a reference point, so they would need to be framed differently if they were to become a compulsory part of the TEF evidence. The subject benchmark statements form part of the Quality Code, and as this is under redevelopment, it would be appropriate to wait for the work to be concluded. On PSRB accreditation, where it is a requirement for a student to be able to work or practice in the relevant field, we are of the view that providers should make it clear where there had been issues with accreditation that need addressing (e.g. significant accreditation conditions), otherwise subjects may potentially have a good TEF rating but PSRB accreditation is at risk.

Interdisciplinarity

12 Do you agree with our approach to capturing interdisciplinary provision (in particular, joint and multi-subject combined courses)?

Yes - agree

Please explain your answer. We want to ensure that providers are not discouraged from taking an interdisciplinary approach as an unintended consequence of subject-level TEF. We therefore welcome feedback on how the proposed approach will impact on providers and students.: Yes

Teaching Intensity

13 On balance, are you in favour of introducing a measure of teaching intensity in the TEF, and what might be the positive impacts or unintended consequences of implementing a measure of teaching intensity?

No - strongly disagree

Please explain your answer.: We maintain that this is not an appropriate measure for inclusion; quantity of teaching does not correlate with quality. The formulaic measurement of teaching intensity does not allow for innovative learning approaches outside of the classroom. It is not sufficiently inclusive of modes of study outside of the conventions of the full-time undergraduate delivery model. The measure is self-reported and open to gaming. We would be concerned that many important elements of a students’ learning experience (e.g. co-curricular activities) are not are not captured.

14 What forms of contact and learning (e.g. lectures, seminars, work-based learning) should and should not be included in a measure of teaching intensity?

Question 14: We do not agree with the measure of teaching intensity as proposed.

15 What method(s)/option(s) do you think are best to measure teaching intensity? Please state if there are any options that you strongly oppose, and suggest any alternative options.

Question 15: Other comments

16 Do you have any comments on the design of subject-level TEF that are not captured in your response to the preceding questions in this consultation?
Question 16:
It is unknown how much emphasis applicants will place on TEF subject outcomes in making their choices. The student research undertaken by OfS as part of the pilot this year must be shared transparently with the sector so that HEIs can better understand the impact that subject level TEF may have in students’ decision making behaviours. We are of the view that a greater level of granularity at subject-level would be more meaningful for students. However, this would undoubtedly create additional administrative burden for HEIs (should Model B be adopted, for example) and poor ‘value for money’ when resource implications are taken into account.