



**Commissioned by  
the Department for  
Education on behalf  
of the TEF  
Independent Review**

**Analysis of  
Responses to the  
call for views for the  
Independent Review  
of the Teaching  
Excellence and  
Student Outcomes  
Framework (TEF)**

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## 1 EXECUTIVE SUMMARY

### Introduction

1. The Teaching Excellence and Student Outcomes Framework (TEF) was introduced by the Government<sup>1</sup> as a way of:
  - Better informing students' choices about what and where to study.
  - Raising esteem for teaching.
  - Recognising and rewarding excellent teaching.
  - Better meeting the needs of employers, business, industry and the professions.
2. The aim of this project completed by York Consulting was to undertake an independent analysis and reporting of responses from the TEF Independent Review consultation: *Independent Review of the Teaching Excellence and Student Outcomes Framework (TEF): Call for views*<sup>2</sup>.

### Analysis Approach

3. Analysis of the call for views responses included the following:
  - Data checking, review and preparation.
  - Manual coding of text responses and development of a coding framework (there were 25 open questions across six sections).
  - Responses submitted by email were coded in line with the six sections of the call for views.
  - An analysis of both qualitative and quantitative data (there were 22 closed questions across six sections) was undertaken.

### Results

4. Responses to the call for views were received from 326 online and 14 email respondents. The online respondent group included publicly funded higher education providers (38%), academics (26%), students/student bodies (9%), representative organisations (6%), further education colleges (5%) and others (15%).
5. More than half (56%) of the responses submitted were on behalf of an organisation and more than half (53%) of respondents had been involved in preparing for or writing a TEF or subject-level TEF submission. A majority of responses (84%) were from England, and most (87%) had not been a TEF assessor or panel member.
6. Responses received to the call for views were the preceptions of organisations or individuals.

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<sup>1</sup> DfE (October 2017) Teaching Excellence and Student Outcomes Framework Specification: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/658490/Teaching Excellence and Student Outcomes Framework Specification.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/658490/Teaching_Excellence_and_Student_Outcomes_Framework_Specification.pdf)

<sup>2</sup> For more information see: <https://www.gov.uk/government/consultations/independent-review-of-tef-call-for-views>

### **Why have TEF?**

7. Seventy five percent of respondents supported the aim of assessing the quality of teaching excellence and student outcomes across providers of higher education. Highest levels of support were among further education colleges (100% were in support).
8. There were high levels of support for assessing the quality of teaching excellence and student outcomes with many sharing a view that it would help to re-balance research and teaching activities in higher education, and provide a specific focus on enhancement and engagement within both teaching and learning. Although support for assessing the quality of teaching excellence was high, there was less support for TEF as the means to achieve this.
9. With regards to the purposes of TEF, 'enhancing provision' was regarded as more important than 'providing information'. The role of TEF in driving improvement across the sector was a key theme, although there was some polarisation of views in relation to this. On the one hand, respondents confirmed that enhancing provision was important, but that this would not be achieved through TEF, and on the other respondents stated that this would be a key outcome of the TEF.
10. While provision of information to promote student choice was supported, many felt that this was not achieved through the TEF. This was primarily due to a view that TEF information was not understood or was frequently misinterpreted, particularly within the context of many other sources of HE information being available.

### **How well does TEF work?**

11. More than half (57%) of respondents felt that the criteria used in TEF were not appropriate. While a majority (82%) did not consider the metrics used in TEF to be the best proxies for measuring the TEF criteria, most (83%) agreed that they should be benchmarked to allow for difference in a provider's student population.
12. There was a mixed response to the appropriateness of the current TEF criteria. The majority of criticism related to Student Outcomes and Learning Gain criteria, particularly the use of employment and earning outcomes as a measure of teaching excellence. Factors outside of quality of teaching (e.g. social, cultural and geographical factors) were felt to have a greater influence over employment and earnings outcomes.
13. One of the most commonly mentioned problems with the current proxies was that they were not felt to be actually measuring teaching quality – instead they were considered to be a more accurate measure of student outcomes (e.g. employment destinations). There were also many criticisms made in relation to the data sets used as current proxies – particularly the use of LEO and the NSS results.
14. Respondents had a clear view that that there was a need for both quantitative and qualitative information within the TEF assessment process. There was support for a more equal weighting in favour of the qualitative evidence. Some expressed the view

that the qualitative data should be considered alongside the quantitative data during the initial

**Are the ratings right?**

15. A majority (64%) of respondents disagreed that the purpose of TEF was met by awarding a single rating, or by having three levels of differentiation, plus a fourth rating for those unable to be assessed. Further education colleges were more likely to agree with these statements compared to other groups. More than two thirds (70%) of those responding did not agree that the purpose of TEF was met by having ratings named gold, silver, bronze and provisional.
16. Key concerns were that having a single rating would not capture the complexity or diversity of the sector, and that it would have the potential to mislead. While there was some support for the simplicity that a single rating provided, others felt that the bronze award could be mis-interpreted (as a rating associated with negative or poorer performance) and alternative approaches were proposed.
17. Having three ratings, and a provisional award, was seen to not meet the purposes of TEF primarily because these provided insufficient detail for students, employers or others. Those in support of the current approach contended that they conveyed a straightforward and non-confusing message.

**Has TEF changed anything?**

18. The introduction of TEF was seen to have positively changed the educational experience of students and to have impacted positively on research and/or knowledge transfer by only a minority of respondents (30% and 9% respectively).
19. In contrast to this, equal numbers (32%) responded 'yes' and 'no' to the question 'Has the introduction of TEF impacted negatively on research and/or knowledge transfer?' (36% did not know).
20. Two main positives were noted, in relation to greater focus on improving teaching quality and increasing opportunities for students to be more engaged in making decisions about their teaching and learning.
21. In contrast, respondents though were clearer around the negatives, including time and resources being diverted to meeting the requirements of TEF at the expense of teaching. It was also felt that there was the potential for TEF to cause a reduction in innovation and academic quality within the curriculum.
22. Some respondents felt that it was too early to discern whether an impact (either positive or negative) on the educational experience of students or on research and/or knowledge transfer had occurred as a result of the introduction of TEF. Other respondents felt that TEF was unlikely to have any impact on these areas, as HEIs were already focussed on teaching quality. There was also felt to be very little impact to date on research and/or knowledge transfer.

### Is TEF worth it?

23. Half (50%) of those responding felt that TEF did not help them as a student/student union/provider/employer/other, whilst 34% indicated that TEF had helped. The further education colleges and publicly funded higher education providers were more likely to state that TEF did help when compared to other groups (53% and 50% respectively).
24. Those with a negative view on 'Is TEF worth it?' cited resource demands, concerns about the greater 'marketisation' of the sector, and the validity of the metrics used. Others emphasised the role of the TEF in demonstrating their commitment to excellence and teaching quality, its contribution to improving performance, and the potential reputational benefits for HEIs.
25. The costs associated with subject-level TEF were viewed to be much greater than for provider-level TEF, with specific concerns as to the impact on smaller providers and on providers offering many subjects. The administrative burden and the impact on staff time were considered to be major costs. Although some respondents were unable to identify significant benefits arising from TEF, others highlighted the positives associated with the greater focus on teaching and enhancement, the improved balance between research and teaching, and opportunities for comparisons between providers.

### Is TEF Fair?

26. More than three quarters (76%) of those responding indicated that there were particular types of student, provision, or provider that were disadvantaged by the current design of TEF in a disproportionate way. One fifth (20%) did not know.
27. More than half (58%) of respondents indicated that particular types of students, provision or providers were advantaged by the current design of TEF in a disproportionate way. One third (33%) did not know.
28. Respondents who felt that the current design of TEF did disproportionately disadvantage particular types of students, provision or providers cited examples including providers with a diverse intake of students, particularly those from widening participation groups; providers who delivered courses in subjects that, whilst socially valuable, do not lead to high-earning jobs; and those in geographical areas with weaker employment markets and lower wages in particular. These disadvantages were felt to be strongly linked to the use of employment and earnings data, as well as the NSS results, within the core metrics.
29. A further perceived disadvantage noted by respondents was the size of the provider, and/or the amount of resource they had to dedicate to their HE provision. Two specific perceived disadvantages were raised in relation to providers which had fewer members of staff and less funding to dedicate to TEF, including the writing of the submission. Having less data due to having smaller cohorts of students was also felt to disadvantage smaller providers, due to issues around the ability of the TEF process to generate statistically significant conclusions from the data, and due to some of the core metrics being unreportable.

### **Conclusions**

- There was a high level of support for assessing the quality of teaching excellence and student outcomes, but lower support for the role TEF in achieving this.
- Many respondents were concerned about the suitability of the TEF criteria and the metrics for measuring teaching excellence.
- Respondents felt that the complexity of HE teaching excellence was not captured in a single rating, or by the proxies used.
- Perceived positive impacts of TEF were reported to be the increased focus on improvement and enhancement, the opportunity for higher student engagement, and a rebalancing of focus between teaching and research.
- Respondents believed that there would be negative impacts due to the significant cost implications of TEF, particularly of subject-level TEF.
- It was felt that the current design of TEF disproportionately impacted on smaller providers, subjects that did not generate high paid employment and HEIs that had diverse student intakes.

## ABBREVIATIONS AND ACRONYMS

Acronym or abbreviation	Definition
BAME	Black, Asian and Minority Ethnic
CPD	Continuing Professional Development
DfE	Department for Education
DLHE	Destination of Leavers from Higher Education
ELIR	Enhancement Led Institutional Review
FE	Further Education
GSBP	Gold, silver, bronze and provisional ratings
HE	Higher Education
HEI	Higher Education Institution
HERA	The Higher Education and Research Act 2017
IMD	Index of Multiple Deprivation
KEF	Knowledge Exchange Framework
LE	Learning Environment
LEO	Longitudinal Education Outcomes
NSS	The National Student Survey
NUS	National Union of Students
OFS	Office for Students
POLAR	Participation of Local Areas Classification Groups
QAA	Quality Assurance Agency
QEF	Quality Enhancement Framework
REF	Research Excellence Framework
SO	Student Outcomes and Learning Gain
SOC codes	Standard Occupational Classification Codes
STEM	Science, Technology, Engineering and Mathematics
TEF	The Teaching Excellence and Students Outcomes Framework
TQ	Teaching Quality
UCAS	The Universities and Colleges Admissions Service
UUK	Universities UK

## DEFINITION OF KEY TERMS

Key term	Definition
Benchmarking	The benchmark is a weighted sector average where weightings are based on the characteristics of the student at the provider. The benchmarking factors currently accounted for in TEF are subject of study, entry qualifications, age, ethnicity, sex, disability, educational disadvantage, qualification level and the year of data used.
Enhancement	Providers striving to improve the quality of the learning opportunities for their students. It is about a provider having policies, structures and processes in place to improve the quality of their learning opportunities.
Gaming	A process by which providers attempt to improve their TEF rating by making changes to improve their performance in the core metrics. This improvement does not always result in actual enhancement.
Grade inflation	A real or perceived upward trend in the average grades awarded to students.
Granularity	The scale and/or level of detail within a data set.
Independent panel	TEF awards are judged by an independent panel of assessors, including students, academics and experts in employment and widening participation.
Initial hypothesis	Quantitative evidence (the core metrics) is considered by assessors to form an initial hypothesis of the rating of gold, silver or bronze.
Metrics	These are measures deriving from national surveys and data returns, which are a key part of the evidence used in TEF assessments.
Split metrics	Each metric is split into sub categories to show how a provider performs with respect to different student groups e.g. age, ethnicity in different years.
Very high and low absolute values	Absolute performance is marked in the metrics based on the top and bottom 10 per cent of providers for that metric.
Written submission	The submission is a document written by the provider that includes additional evidence (qualitative and/or quantitative) against the criteria.
Provider-level	TEF provides information about teaching at higher education providers to help prospective students choose where to study. Provider-level TEF gives a rating at the provider level only.
Subject-level	Subject-level TEF is designed to produce TEF ratings at subject, as well as college or university level.
UNISTATS	A web-based resource that compares UK higher education data <sup>3</sup> .

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<sup>3</sup> <https://unistats.ac.uk/>

## 2 INTRODUCTION

### Background and Context

- 2.1 The Teaching Excellence and Students Outcomes Framework (TEF) was introduced to assess the quality of undergraduate teaching in higher education institutions in England. The devolved administrations in the UK can choose to opt-in.
- 2.2 TEF measures teaching excellence in three key areas:
- **Teaching quality** – the extent to which teaching stimulates and challenges students and maximises engagement with their studies.
  - **Learning environment** – the effectiveness of resources and activities (e.g. libraries, laboratories and work experience) that support university learning and promote retention, progression and attainment.
  - **Student outcomes and learning gain** – the extent to which all students achieve educational and professional goals (particularly those from disadvantaged backgrounds).
- 2.3 The TEF was introduced by the Government<sup>4</sup> as a way of:
- Better informing students' choices about what and where to study.
  - Raising esteem for teaching.
  - Recognising and rewarding excellent teaching.
  - Better meeting the needs of employers, business, industry and the professions.
- 2.4 Depending on core metrics (the National Student Survey (NSS), student retention rates, the proportion of graduates in employment or further studies) and additional submitted evidence, Higher Education Institutions can achieve gold, silver, bronze or provisional awards, which are valid for three years. Based on evidence available to the assessment panel HEIs are awarded one of these ratings:
- A gold rating means that provision is consistently outstanding and of the highest quality found in the UK Higher Education sector.
  - A silver rating indicates that provision is of high quality and consistently exceeds the rigorous national quality requirements for all UK Higher Education.
  - A bronze rating indicates that provision meets the rigorous national quality requirements for UK higher education.
  - A provisional rating indicates that a provider meets rigorous national quality requirements for UK higher education but is unable to be assessed for a TEF rating of gold, silver or bronze.
- 2.5 In 2017, 295 institutions were assessed, with 59 achieving gold, 116 silver, 56 bronze and 64 provisional.

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<sup>4</sup> DfE (October 2017) Teaching Excellence and Student Outcomes Framework Specification: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/658490/Teaching\\_Excellence\\_and\\_Student\\_Outcomes\\_Framework\\_Specification.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/658490/Teaching_Excellence_and_Student_Outcomes_Framework_Specification.pdf)

- 2.6 After the first (trial) year of the TEF<sup>5</sup> the government undertook a ‘lessons learned’ exercise. Based on feedback key conclusions and actions were as follows:
- The structure and methodology for TEF was working well and the assessment process was retained.
  - To reflect the broad-based assessment of teaching outcomes the name Teaching Excellence and Student Outcomes Framework (TEF) was adopted.
  - Refinements of the assessment process included: weighting for NSS metrics, additional assessment information from part-time student providers, adjustments to very high and low absolute values for each metric, and benchmarking factors to reflect all types of disadvantage.
  - Changes were made to strengthen accountability from providers.
- 2.7 TEF ratings are currently provided at the ‘provider-level’ (for the university or college). To explore the scope for information to be provided at the subject-level, the DfE has been piloting ‘subject-level’ TEF (to be trialled alongside TEF Year 3 from 2017-2018). This will provide ratings at the subject-level and will be subject to evaluation<sup>6</sup>.

### **Independent Review of Teaching Excellence and Student Outcome Framework: Call for views**

- 2.8 Section 26 of the Higher Education and Research Act 2017 (HERA) requires that the Secretary of State for Education appoints an independent person to report on the operation of TEF in 2019. Dame Shirley Pearce was appointed to undertake this review. HERA stated that the review should report on the following:
- The process by which ratings are determined under the scheme and the sources of statistical information used in that process.
  - Whether that process, and those sources of statistical information, are fit for use for the purposes of determining ratings under the scheme.
  - The names of the rating under the scheme and whether those names are appropriate.
  - The impact of the scheme on the ability of higher education providers to which the scheme applies to carry out their functions (including in particular their functions relating to teaching and research).
  - An assessment of whether the scheme is in the public interest.
  - Any other matter that Dame Shirley considers relevant.

### **Aims of the project**

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<sup>5</sup> DfE (October 2017) Teaching Excellence and Student Outcomes Framework: lessons learned from Year Two: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/651157/DfE\\_TEF\\_Year\\_2\\_Lessons\\_Learned-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/651157/DfE_TEF_Year_2_Lessons_Learned-report.pdf)

<sup>6</sup> DfE (July, 2017) Teaching Excellence Framework: Subject-level pilot specification: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/629976/Teaching\\_Excellence\\_Framework\\_Subject-level\\_pilot\\_specification.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/629976/Teaching_Excellence_Framework_Subject-level_pilot_specification.pdf)

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2.9 The aim of this project undertaken by York Consulting was to undertake an independent analysis and reporting of responses from the TEF Independent Review consultation: *Independent Review of the Teaching Excellence and Student Outcomes Framework (TEF): Call for views*<sup>7</sup>.

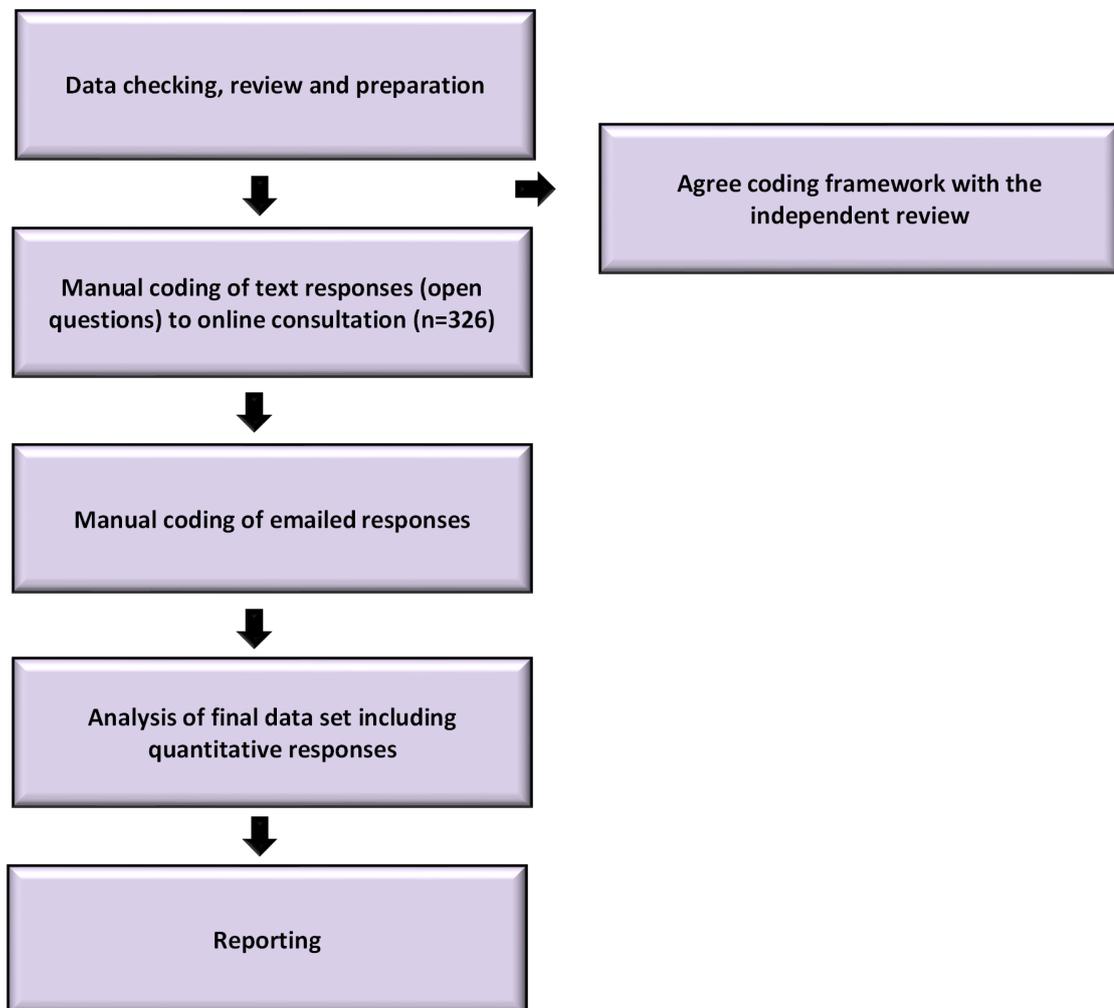
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<sup>7</sup> For more information see: <https://www.gov.uk/government/consultations/independent-review-of-tef-call-for-views>

### 3 METHODOLOGY

3.1 The methodological approach for analysis of the call for views is shown in Figure 2.1 below:

**Figure 3.1: Call for views Methodology**



#### **Data review checking, review and preparation**

- 3.2 Preparation of a draft coding framework for each of the 25 open questions was undertaken. Coding themes were identified using an initial set of 50 respondents from the early responses to the online consultation (76 responses had been received at 1 February 2019). This approach was based on selecting up to 10 key themes per question.
- 3.3 Further review and revisions of the coding framework were undertaken once the final set of online responses was made available (1 March 2019). The initial draft was then updated and circulated to the independent review for review and feedback.
- 3.4 Confirmation was sought from the independent review that the draft coding framework met expectations regarding the scope of anticipated responses. Feedback on themes was incorporated into the coding process where relevant.

- 3.5 Data sets were uploaded to NVivo 12 Plus<sup>8</sup> qualitative data analysis software. This involved the following:
- Responses were converted into a Word format and imported to NVivo on a question by question basis.
  - The themes from the coding framework were set up as thematic ‘Nodes’ in NVivo.
  - All respondent data (online consultations) were coded under the thematic nodes (this included ‘other’ coding).
  - Where the number of references for each code exceeded 80, further sub coding was undertaken in NVivo.
  - Review of each code by reference rates was used to determine the final coding framework (see Appendix 2). In cases where the number of references was very low (under 10) consideration was given to merging these into other codes.
- 3.6 All coded data was retained in NVivo and results from the all the sample coding recorded (see Appendix 2) including:
- The number of codes for each question and a brief description for each (an additional ‘other issues’ code was created for each question to capture any additional themes).
  - The number of references for each code (node).

### **Analysis of email responses**

- 3.7 Responses to the TEF independent consultation that were submitted by email were collated. The process for this included:
- Emailed responses were reviewed with reference to the format and scope of the information included. As a majority of the emailed submissions did not conform to the order and/or questions included in the online consultation a separate coding and analytical process was undertaken.
  - Emailed submissions were coded under the six headings of the call for views: Why have TEF? How well does TEF work? Are the ratings right? Has TEF changed anything? Is TEF worth it? And Is TEF fair?
  - The results from the analysis of coded data were reviewed in line with the online consultation responses. Particular consideration was given to areas of consensus and to expressed views that differed to the submitted to the online consultation. Illustrative quotes were also identified.

### **Analysis of the final data sets**

- 3.8 The attributes of the respondent group were identified in relation to the questions asked in Section One of the online consultation “Who are you?”. This does not include questions 1-4 and 5a in order to protect the confidentiality of respondents.

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<sup>8</sup> <https://www.qsrinternational.com/nvivo/what-is-nvivo>

3.9 The respondent groups for the analysis of closed questions were determined by grouping of responses to question four. This is shown in tables 2.1:

**Table 3.1: In what capacity are you responding to this consultation? (Question 4)**

<b>Respondent groups included (from question four)</b>	<b>Groups for analysis</b>	<b>No. of respondents in group (n=326)</b>
Publicly funded higher education provider (n=124)	Publicly funded higher education (HE) providers	124
Academic (n=86)	Academics	86
Body representing students in higher education (n=18)	Students/student bodies	29
Student in higher education (n=10)	Students/student bodies	
Prospective student (n=1)	Students/student bodies	
Further education college (n=17)	Further education (FE) colleges	17
Representative organisation, business, or trade body (n=20)	Representative organisations	21
Trade union or staff association (n=1)	Representative organisations	
Other (please state) (n=19)	Other	49
Individual (non-student) (n=16)	Other	
Alternative higher education provider (with designated courses) (n=1)	Other	
Charity or social enterprise (n=4)	Other	
Alternative higher education provider (no designated courses) (n=7)	Other	
Central/local government, agency or body (n=1)	Other	
Employer (n=1)	Other	

3.10 Questions analysed by Groups (1 to 6) as outlined above were the closed (quantitative questions) included in the call for views (please see Appendix 3 for a list of all questions).

### **Analysis of consultation data: challenges**

3.11 A range of challenges and barriers were identified during the analytical process. These specifically related to the qualitative responses provided by those participating in the consultation. The key barriers and challenges identified were:

- Some of the respondents provided complex and very detailed information in their answers to individual questions. Wide ranging and detailed responses were frequently provided to the earlier sections of the consultation, and in many instances the respondents addressed subsequent questions as part of their initial answers. With this in mind the analysis of initial questions has been focused on describing the range of issues raised by respondents in order to avoid repetition across the reporting.

- Respondents in some instances included references to web-based material to support their arguments or to signpost to sources of evidence. Any web addresses included in a response have not been incorporated into the coding process.
- Some very lengthy responses were provided to questions particularly in the first two sections – Q14: 52,961 words and Q11b: 37,767 words. The total word count for text responses was 429,606 and the approximate number of words in all the responses to the 25 open questions (listed in Appendix 3) ranged from 4,095 to 52,961 words per question. The average was 17,184 words. Approximate word counts for each question have been included in Appendix 1.
- This report conveys the key messages arising from the analysis of the consultation responses and, where appropriate, highlights these with word-for-word quotations. It intentionally does not provide challenge or critique on either the key messages or the quotations, e.g. by highlighting where respondent views may not be factually accurate.
- Participation in the consultation was on a self-selecting basis. The findings in the report therefore carry the unavoidable risk of self-selection bias, i.e. they may not be representative of the views of all students, HE providers or others.
- Some respondents re-iterated their views across the questions, occasionally using the same wording. This resulted in a level of repetition across the text responses and different questions and sections. The analysis has aimed to capture the range of responses provided to each question and to reflect all views. As such, key issues are repeated.
- Many responses were also inconsistent with the question being asked, or in addition to providing a level of response to the question asked, then strayed into another subject area. Again, this made the task of coding more complex and introduced greater subjectivity to the analysis.

#### **Data interpretation – some considerations**

- 3.12 Respondents were invited to provide their views in relation to the 27 questions in the call for views online consultation. As such all data analysed for this report is based solely on the **perceptions of this group of respondents**.
- 3.13 The call for views consultation invited responses from both individuals and organisations. It is likely that organisational responses reflect the perceptions of a **large body of individuals** and may therefore be considered **more representative** than those from a **single individual**.

#### **Report Structure**

- 3.14 The remainder of this report is structured as follows:
- **Chapter Three: Characteristics of the respondents:** this chapter provides a profile of the online and email/written responses sourced from Section One: Who are you? Of the call for views.

- **Chapter Four: Results from call for views:** this chapter provides key findings from each of the call for views sections reported under each of the questions included in the section:
  - Section Two: Why have TEF?
  - Section Three: How well does TEF work?
  - Section Four: Are the ratings right?
  - Section Five: Has TEF changed anything?
  - Section Six: Is TEF worth it?
  - Section Seven: Is TEF fair?
  
- **Chapter Five** provides conclusions.

### **Additional analysis of call for views consultation responses**

3.15 The Independent Review team requested additional analysis of consultation responses. This was further to discussion and insights arising from an initial review and presentation of the analysis. The supplementary analysis has been included in three appendices (appendix 4-6) as follows:

- **Appendix Four:** Additional quantitative analysis. Further analysis was conducted for 15 closed (quantitative) questions by sub-groups to compare FE college responses with the FE mission group responses, and whether or not responses had been approved by the institution's governing body.
- **Appendix Five:** Suggestions for alternatives to TEF. Additional analysis of all suggestions from respondents for alternatives to TEF or to TEF ratings.
- **Appendix Six:** Pre and Post 1992 comparisons. This additional analysis explored responses between two sub-groups of the 'publicly funded higher education providers' – pre-1992 and post-1992.

## 4 CHARACTERISTICS OF THE RESPONDENTS

### Online responses

- 4.1 This section presents the characteristics of the 326 respondents who completed the online call for views, reflecting responses received to Section One ('Who are you?')<sup>9</sup> of the call for views. The table below shows that over a third (38%) of all responses were from publicly funded HE providers and just over a quarter (26%) were from academics. Much smaller proportions were received from the remaining four respondent groups (less than 10% in each case). The 'student/student bodies' group included **11** (38%) students (including a prospective student) and **18** student bodies (62%).

**Table 4.1: In what capacity are you responding to this consultation? (Question 4)**

	Number	Percent
Publicly funded HE providers	124	38%
Academic	86	26%
Student/student bodies	29	9%
Representative Organisations	21	6%
FE college	17	5%
Other	49	15%
<b>Total</b>	<b>326</b>	<b>100%</b>

- 4.2 Just over half (56%) of responses received to the call for views were submitted on behalf of an organisation – Table 4.2.

**Table 4.2: Are you responding on behalf of an organisation? (Question 5)**

	Number	Percent
Yes	182	56%
No	142	44%
Not answered	2	1%
<b>Total</b>	<b>326</b>	<b>100%</b>

- 4.3 Table 4.3 below shows that just over half (53%) of respondents had been involved in preparing for or writing a TEF or subject TEF submission, whilst 45% had not. The vast majority (87%) of respondents have not been a TEF assessor or panel member (Table 4.4).

**Table 4.3: Have you been involved in preparing for or writing a TEF or subject TEF submission? (Question 6)**

	Number	Percent
Yes	174	53%
No	146	45%
Not answered	2	1%
Don't know	4	1%
<b>Total</b>	<b>326</b>	<b>100%</b>

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<sup>9</sup> Note questions that would have enabled respondents to be identified have not been analysed.

**Table 4.4: Have you been a TEF assessor or panel member? (Question 7)**

	Number	Percent
No	285	87%
Yes	38	12%
Not answered	1	<1%
Don't know	2	1%
<b>Total</b>	<b>326</b>	<b>100%</b>

- 4.4 Table 4.5 below shows that the majority of responses (84%) were received from those in England. All of the other options are represented by less than 10% of the respondent sample.

**Table 4.5: Please indicate which UK country/other country you are responding from. (Question 9)**

	Number	Percent
England	274	84%
UK-wide	25	8%
Wales	13	4%
Scotland	8	2%
Other non-UK <sup>10</sup>	3	1%
Northern Ireland	2	1%
<b>Total</b>	<b>326</b>	<b>100%</b>

- 4.5 Of the 128 responses to the call for views provided on behalf of a named UK Higher Education provider, 46 (36%) received a gold award, 53 (41%) a silver award, 17 (13%) a bronze award, and 1 (1%) a provisional award. Eleven (9%) did not participate in TEF. This represents 64% of all UK providers with a gold award, 39% of those with a silver award, 27% of providers with a bronze award, and 3% of those with a provisional award.

### Email responses

- 4.6 Fourteen email responses were submitted to DfE in relation to the call for views. The majority of responses were received from representative bodies, though a small number of providers and individuals gave their views via email. Information, however, on the characteristics of those responding via email was not received.

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<sup>10</sup> These three respondents indicated that they were from USA, Taiwan and Nigeria.

## 5 RESULTS FROM THE CALL FOR VIEWS

### Section Two: Why have TEF?

- 5.1 This section of the call for views sought views on the aim and purposes of TEF. The Government has stated that the purpose of the TEF is to: better inform student 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.

#### Question 10

- 5.2 Question 10 asked respondents about their level of support for the aim of assessing the quality of teaching excellence and student outcomes across providers of higher education. Table 5.1 below shows the responses to this question by each of the groupings.

**Table 5.1: Do you support the aim of assessing the quality of teaching excellence and student outcomes across providers of higher education? (Question 10)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Publicly funded HE providers (n=124)	112	90%	9	7%	3	2%
Academic (n=85)	36	42%	36	42%	13	15%
Student/student bodies (n=29)	23	79%	2	7%	4	14%
FE college (n=17)	17	100%	-	-	-	-
Representative Organisations (n=19)	16	84%	1	5%	2	11%
Other (n=48)	36	75%	5	10%	7	15%
<b>Total (n=322)</b>	<b>240</b>	<b>75%</b>	<b>53</b>	<b>16%</b>	<b>29</b>	<b>9%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

- 5.3 Three quarters of all respondents (75%) supported the aim of assessing the quality of teaching excellence and student outcomes across providers of higher education. Groups most strongly supporting this were FE colleges (100%), publicly funded HE providers (90%), and representative organisations (84%). Least likely to support this aim were academics (42% stated 'no'), and others (10% stated 'no').

- 5.4 Respondents expressed views (as open or text responses)<sup>11</sup> regarding the value and benefits of assessing teaching quality in the HE sector. Some outlined reasons for their opposition to assessment or to TEF, while others discussed the positive impacts of assessing teaching excellence and student outcomes. Although some respondents indicated that they supported the principle of teaching assessment, they also outlined why they were not supportive of the TEF. Other answers related to student choices and information, the TEF metrics, issues of complexity, alternatives to TEF and suggestions for improvement. These areas are discussed in the following paragraphs. A total of 178 responses (55% of all respondents) were received for this question.
- 5.5 The largest volumes of feedback were in relation to:
- The value and benefits of assessing the quality of teaching excellence (77 references).
  - Discussion around the TEF metrics (71 references).
  - Support for the principle of assessment but not for the TEF (44 references).
- 5.6 As responses given to question 10 addressed most of the areas covered in subsequent questions, a summary of recurring themes under each of the codes has been provided. Each of the themes emerging from coded responses has been included below.

The value and benefits of assessing teaching quality (77 references)

- Assessment of the quality of teaching excellence has the potential to redress the imbalance between teaching and research across HE.
- Assessment of the quality of teaching excellence and student outcomes will ensure that this is an area of focus for HEIs and that it is taken seriously and valued.
- A focus on assessment of teaching is important as HE income is largely based on the delivery of teaching excellence and student outcomes.
- Assessment will contribute to raising the engagement and enhancement of teaching and learning as well as providing an opportunity to demonstrate an improvement in performance.
- Assessment of the quality of teaching excellence and student outcomes can contribute to the reputation of HE in the UK (i.e. enhancing the reputation of institutions across the sector as a whole).
- Excellent teaching quality is a key student expectation and an important mission for universities.

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<sup>11</sup> A majority of the questions in the call for views initially asked for levels of agreement (e.g. yes/no/don't know) followed by a request for an explanation or reason for their response (an open or text response). For the initial closed question a response was required but for the open questions responses were optional (as such response rates differ). The number of references for each code has been recorded, but one lengthy response can generate multiple references across a number of different codes.

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- Assessment of excellence has the potential to provide information to both prospective and current students to inform their choices and decision-making.
- It is important in order to address the rising expectations of students.
- Although assessment is valuable and potentially beneficial, the mechanism for assessment requires careful consideration.
- It is important for both corporate and academic ambitions.
- It is important in driving up standards and to ensure that students have the best possible experience.
- It will ensure that the HE sector is more transparent and accountable to the public.

*“We support the genuine assessment of teaching excellence as it helps to raise the esteem of teaching, often overshadowed by the esteem given to research.” Other*

#### TEF Metrics (71 references)

- The metrics used do not account for the different characteristics of student groups e.g. mature students.
- Concerns raised about the measure of income and the use of employment data as part of the assessment.
- The focus on ‘historic’ metrics.
- The meaning of metrics and data when sample sizes are small.
- Other aspects of ‘teaching excellence’ and student outcomes are not captured by the metrics e.g. social benefits and HEI ethos.
- The ‘cliff edge’<sup>12</sup> nature of the single ratings gold, silver or bronze, fails to capture the more graduated aspects of performance and concerns about how these ratings are interpreted.
- The indicators used in TEF are proxies for teaching excellence.
- Support for the use of split-metrics in the TEF and of benchmarked data.
- Concerns about the validity and reliability of the data.
- Concerns about the potential for ‘gaming’ around the metrics and data.
- The potential for unintended consequences arising from the use of the metrics.

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<sup>12</sup> ‘Cliff edge’ refers to the cases of borderline assessments for ratings that result in a very small difference between ratings.

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*“Employability data, especially LEO, are too blunt a tool to properly evaluate how the provider meets external stakeholder needs, which stretch far beyond the supply of graduates and their median earnings. Arguably, the use of LEO data risks the unintended consequence of institutions urging graduates to work in London and the South East where salaries are higher in order to gamify their median salary data – setting the scene for an exodus from the North where salaries are depressed.”*  
Publicly funded higher education provider

Support for the principle of assessment but not for TEF (44 references)

- A view that the TEF is not actually assessing the quality of teaching.
- TEF favours traditional and large-scale degrees (e.g. Science, Technology, Engineering and Maths (STEM)).
- A view that the quality of teaching should not be confused with student outcomes. For example, that student outcomes depend on a range of different factors (e.g. socio-economic status of students) and not just on the teaching provided by a higher education institution (HEI).
- The view that the TEF does not support comparability across HEIs and could potentially reinforce existing differences between different providers.
- The assessment of teaching quality through metrics and student outcomes does not reflect teaching excellence. For example, student employment outcomes are determined by a range of wider social and cultural factors which impact on earning levels.
- TEF is inappropriate or inadequate for the assessment of teaching excellence in higher education due to: a narrow provider focus, the metrics used, the resource burden for HEIs, the focus only on outcomes, and time lags in the data e.g. Longitudinal Education Outcomes (LEO).
- The combination of assessment of teaching excellence with student outcomes.
- No clear definition of ‘teaching excellence’ has been set out.
- A view that TEF is a ‘political tool’.
- Concerns about the ‘marketisation’ of higher education and increasing competitiveness.

*“Quality should not be confused with student outcomes, which is known to depend on a variety of other factors than the teaching provided, notably the circumstances prevailing in the job market at particular times and the socio-economic background of students.”* Other

*“[Name] Students’ Union supports the aim of assessing the quality of teaching excellence, but not for the purpose of driving increased competition between providers and the marketisation of higher education.”* Students/student bodies

Positive impacts of the TEF (43 references)

- TEF supports diversity in the sector because it will ensure that the rating of quality will be equal across all providers.
- TEF has increased engagement with the enhancement of teaching and learning, raising esteem for teaching, and promoting parity between teaching and research.
- TEF has contributed to the reputation of HE in the UK alongside enhancing confidence in the sector (both nationally and internationally).
- TEF has elevated the importance and profile of excellent teaching.
- TEF has had a role in driving providers to improve continuously and to focus on enhancing the student experience.
- TEF has positively changed the way in which teaching, and learning are valued in HE.
- TEF has ensured that students are better informed to make judgements when selecting a provider.
- The introduction of TEF has helped to create a more equal status between research and teaching.

*“The TEF has the potential to both recognise and reward excellence in teaching, and to raise the esteem for teaching across the sector as a result.”* Publicly funded higher education provider

*“TEF provides an opportunity to ensure students are better informed of the kind of teaching experience they can expect when selecting a provider. More importantly, the exercise helps drive best practice across the sector with regards to academic quality and student experience.”* Publicly funded higher education provider

Student choices and information (40 references)

- To meet the purpose of being informative for students, employers, HE providers and the public, TEF information should be reliable, valid, and comprehensive.
- The information is important because some students attend university to improve their job prospects.
- A view that information is important for student choices but that TEF does not deliver in relation to this.
- Risk of duplicating existing information already available to prospective student through TEF. This could compromise the utility and understanding of TEF information.
- Low awareness of TEF among students means that they are not using the information.

*“[student body] research found that employment outcomes ranked 7<sup>th</sup> among factors students regard as indicative of excellent teaching. Non-continuation was also ranked low. This challenges the current choice and balance of metrics in TEF. We are aware of no evidence that TEF meets employer needs.”* Publicly funded higher education institution

*“...considering the amount of information already available to prospective students, particularly within league tables, there is a risk of unnecessarily duplicating information that is already available.”* Publicly funded higher education provider

#### Suggestions for improvement (34 references)

- Different and/or a wider range of ratings.
- The use of a different set of metrics.
- A lower cost and less resource intensive approach.
- The separation of ‘teaching excellence’ and ‘student outcomes’.
- Educational enhancement as the single and main purpose of the TEF.
- Greater incorporation of the student voice and involvement of student bodies.

*“We do believe that whatever shape this framework should take, that student involvement in the creation and operation of it are fundamental. Students should continue to be at the heart of the creation process, determining what data and metrics make up a rating and how the assessment process should work.”* Students/student bodies

#### Opposition to assessment and/or the TEF (11 references)

- Concerns that the TEF (as it has been set up) may not be able to meet the aims of assessing the quality of teaching excellence.
- Concerns that measurement and assessment across the sector as a whole is very challenging, primarily due to the complexity of teaching excellence and of student outcomes.
- A view that there is the potential for information that is generated by the TEF to mislead and be based on flawed or misused evidence.
- For subject-level TEF, difficulties associated with accommodating multi-subject programmes in both a meaningful and fair way were outlined.

*“No. This is not because student outcomes and the quality of teaching are unimportant: they are very important. It is not because nothing useful about them can be measured: if we are to learn anything about how they vary and how to improve them we must attempt to measure them. It is because central measurement and public assessment are hopeless, self-defeating instruments for understanding and improving activities in a complex and hugely diverse context.”* Other

*“The variables contributing to “teaching excellence” are so numerous and complex, and the potential abuses and unintended consequences so corrosive, that any such exercise is worse than useless.” Academic*

Alternatives to TEF (8 references)

- The monitoring system used by the Quality Assurance Agency (QAA).
- The Quality Enhancement Framework (QEF) as used in Scotland.
- The Enhancement Led Institutional Review (ELIR) (Scotland).
- Office for Students (OfS) registration and the QAA should be sufficient.

Other comments

5.7 Other views (40 references) that were included in responses to this question have been listed below.

- A small group of respondents outlined a view that TEF does not reflect the complexity of teaching excellence and student outcomes. This related to the sector as a whole, which encompasses a diverse range of subjects (and elements within subjects) and to students, who come from a wide range of backgrounds and circumstances. As such, it was argued, making comparisons across the sector as a whole would be challenging.
- A few respondents proposed alternative approaches to the TEF including; monitoring similar to that undertaken through the QAA and OfS registration processes; and the approach used in Scotland QEF and the ELIR.
- Further discussion of the relationship between the metrics used and teaching excellence.
- For the HE sector, the TEF will help to ensure that there is a strategic focus on teaching as well as research.
- Amongst employers awareness of TEF is low.
- Discussion of the role of TEF in putting learning, teaching and student experience higher on the agenda of universities.
- Support and endorsement of a national framework that is focused on teaching quality and improved outcomes.

**Question 11**

5.8 Question 11 explored the purposes of TEF with regards to the importance of providing information and enhancing the provision of higher education. The results for this question have been included below for each of the respondent groups in Table 5.2.

**Table 5.2: These purposes fall into two main areas: providing information and enhancing the provision of higher education. Which of these is the most important? (Question 11a)\***

Respondent group	Providing information		Enhancing provision		Both are equally important		Neither are important	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Publicly funded HE providers (n=122)	4	3%	69	57%	42	34%	7	6%
Academic (n=85)	7	8%	37	44%	23	27%	18	21%
Student/student bodies (n=28)	3	11%	18	64%	7	25%	-	-
FE college (n=17)	2	12%	7	41%	8	47%	-	-
Representative Organisations (n=17)	1	6%	11	65%	5	29%	-	-
Other (n=48)	6	13%	19	40%	23	48%	-	-
<b>Total (n=317)</b>	<b>23</b>	<b>7%</b>	<b>161</b>	<b>51%</b>	<b>108</b>	<b>34%</b>	<b>25</b>	<b>8%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

5.9 Overall ‘enhancing provision’ was regarded to be the most important purpose with over one half (51%) choosing this answer. Just over one third (34%) considered both ‘enhancing provision’ and the ‘provision of information’ to be of equal importance. Academics were the most likely to state that neither of these are important purposes. Across all the groups the FE colleges and ‘other’ were slightly more likely to consider that the ‘provision of information’ was the most important purpose of TEF.

### **Question 11b**

5.10 Consultation respondents were asked to provide reasons for the purposes of TEF they considered to be the most important (text responses). A total of 290 responded to this question (89% of all respondents).

5.11 Responses covered a wide range of areas including discussion of the impact of the TEF, its role in contributing to student choices, the relevance of TEF information, comments about teaching in HE, and resource issues. The emerging themes have been outlined in this section.

#### Impact of TEF on HEIs or academia

5.12 Responses included reference to the positive impact that the TEF has had on HEIs. This includes its role in driving HEIs to focus on the student experience and to consider improvements and enhancements of teaching quality. Many discussed the REF and the importance of the TEF in supporting a balance between research and teaching activities.

5.13 The role of TEF in ensuring a greater emphasis on and a commitment to the enhancement of provision in HEIs was a key reason why this was the most important purpose. A smaller group discussed the value of TEF information in informing providers, employers and students or stated that the information generated by TEF was not meaningful. Key areas covered in the responses have been listed below.

- Greater commercialisation of HEIs was a concern.
- The role that the TEF has had in ensuring that HEIs reflect on their provision and its role in supporting comparisons between institutions.
- Concerns that as a result of the TEF, HEIs choose to invest in employment focused activities at the expense of academic rigour:

*“The problem with ‘recognising and rewarding’ and ‘meeting employer needs’ is that it can produce some perverse incentives in the system. I do not want a system in which universities get rewarded for reducing academic rigour and increasing content-free ‘employer friendly’ activities that employers would be better off investing in themselves to greater effect.”* Students/student bodies

- The split-metrics have helped HEIs to consider the needs of different student groups and to ensure equity in teaching excellence.
- TEF has value as an enhancement tool because it supports reflection and efforts to improve the quality of the student experience.
- Students and their learning experience now have a much stronger focus from HEIs as a result of TEF:

*“There is little doubt that the TEF is motivating HEIs to give teaching and the student experience far greater focus, and this is to be welcomed. It helps to address a long-standing imbalance between research and teaching and if there is a REF, there should be a TEF.”* Other

#### Informed student choices

5.14 A large proportion of the responses to this question outlined views on the extent to which they considered that TEF had or will help to inform student choice. This related to views on the utility or accuracy of the information generated by TEF and how it might be understood by students. Many felt that students being informed (by the TEF) about study options was important.

5.15 Some respondents outlined the view that a range of other factors also impacted on student choices (with TEF having little or no impact). As such, responses included those who felt that TEF did not influence student choice.

5.16 Below, the themes relating to the importance of students being informed have been provided.

- Many of those responding stated that particularly within the context of the substantial investment (e.g. via fees) being made in their higher education, students should receive comprehensive information that can inform their provider choice. However, of this group of respondents many considered that TEF was not delivering in relation to this. TEF it was argued had low levels of awareness among students and as a result was not directly impacting on their choices:

*“Research at our own institution and with parents of Year 13 students has shown that both students and parents are unaware of the TEF.”* Further education college

- The TEF was seen by some as an important publicly available source of impartial guidance.
- The TEF was regarded by some respondents to be making an important contribution to add to other information already available to students.
- Because the information students need is important, it was crucial that it is both accurate and reliable:

*“It is essential the prospective students are provided with accurate and up-to-date information to inform their choices and decision-making.”*  
Publicly funded higher education provider

5.17 Some respondents stated that sufficient information was already available without the TEF:

- As there was already a lot of information available to students TEF had the potential to cause confusion.
- TEF information was not seen to be adding anything to the sources of student information already in place (to assist provider choices).
- Students are more likely to use other sources of information e.g. UNISTATS
- Other sources of information are more accessible.
- Views that the TEF information is not accurate and therefore will not provide useful information for student choices.

5.18 The view that the TEF is not well understood was outlined:

- The view that students engage with TEF at only a superficial level.
- Students are confused or misled about the TEF or aspects of it e.g. the benchmarking is not widely understood.
- Evidence cited by respondents which indicates that the TEF was not widely understood by students (e.g. research conducted by the OfS).
- The TEF single rating provides little information e.g. the gold or bronze awards could potentially mislead:

*“However, the current TEF classification system and the basis for the reported institutional outcomes are not well understood by students, staff, or the public. For many reasons the current summary judgements (gold, silver, bronze) are simplistic and should be regarded tentatively by students and others.”* Publicly funded higher education provider

- Misinterpretation of TEF information by students e.g. that it was generated by an Ofsted inspection, it provided insufficient detail or that it was limited and did not provide information on the strengths and weakness of a provider:

*“Students will not readily understand the basis for either the overall judgements or the underpinning metrics; there is currently a perception that TEF classifications are informed by Ofsted-style teaching observations.”* Publicly funded higher education provider

- Respondents outlined the view that student choices were influenced by a wide range of factors and that these would be prioritised in different ways. Factors that were considered included; location, reputation, caring responsibilities, course content, UNISTATS, and league tables. As such, TEF information may not always have been a consideration.

*“There are a wealth of data sources available for students that are much more accessible and allowing students to fully review the student outcomes for courses rather than the wider TEF subject areas (e.g. UNISTATS).”* Publicly funded higher education provider

#### The relevance of TEF information

5.19 When considering the relative importance of information and enhancing the provision of higher education, a large proportion of respondents outlined reasons for enhancement being the more important purpose:

- Some suggested that the enhancement of teaching and learning should be the sole purpose and/or main focus of the TEF.
- The ‘enhancement of provision’ purpose of TEF was widely seen to be more effective than the ‘providing information’ purpose.
- Respondents stated that without enhancement, student information to support HEI choices would have little value.
- Enhancement of provision was more important because the TEF information is poorly understood and there is already a substantial amount of information available to students.

*“The exercise should explicitly focus on enhancing teaching and learning and other measures should be separated out.”* Publicly funded higher education provider

*“We note the recent research undertaken for [National Union of Students] NUS, which found that students do not understand the detailed workings behind TEF ratings.”* Publicly funded higher education provider

- The view that the TEF information was less important as it made only a small contribution to the large volume of information that was already available.
- Without drawing on wider sources of information (outside of TEF) some respondents felt that there was a risk of unintended consequences e.g. where teaching quality was not accurately assessed by the metrics:  
*“It provides a small subset of the information in which applicants may be interested, and provides the information with limited context, and outside of an institution’s vision and culture. We also note that similar information to that provided by TEF, is available on UNISTATS and this site is known to be little used by prospective students.”* Publicly funded higher education provider

#### The TEF and teaching quality

- 5.20 Many respondents commented on the assessment of teaching quality. There was some polarisation of views. While some stated that the TEF core metrics do not effectively assess the quality of teaching and education, others considered that the TEF data did provide a fair and rigorous assessment:  
*“TEF is a far more rigorous and fair assessment of teaching and student outcomes, with a significant peer review element, when compared to the very simplistic treatment of metrics – and consequent rankings – in newspaper league tables. Its treatment of some metrics, in theory, are therefore a more reasonable basis for strategic enhancement.”* Publicly funded higher education provider
- 5.21 Enhancement was regarded as an important purpose of the TEF because improvements in the quality of teaching and education were widely supported and seen as both valuable and beneficial. Some respondents outlined that TEF had a role in promoting innovation, enhancement and a process of continual improvement.
- 5.22 In contrast to this, some respondents considered that it had not impacted on the enhancement of provision, primarily due to TEF’s impact on limited HEI resources or that processes to enhancing provision were already in place. The TEF it was argued, failed to raise the esteem for teaching, or to reward or promote teaching in the sector.
- 5.23 Other respondents considered that while the need to enhance provision of teaching and learning was the most important purpose and should be the main focus for this exercise, currently this was not being achieved through the TEF. The inappropriateness of the metrics, or the standardised approach to measuring teaching quality were given as key reasons for this.
- 5.24 It was noted that smaller providers with low student numbers would not be able to demonstrate enhancement of their provision due to small changes not impacting on the data (and the subsequent rating).

### TEF Metrics

- 5.25 There was some discussion of the TEF metrics specifically in relation to the extent to which they measure teaching excellence. While the utility of the metrics as a source of information for students was recognised, there was seen to be reliance on historic data and some felt that this same information was available elsewhere. However, the benchmarked metrics were seen to offer opportunities for HEIs to target their enhancement work.

### Other issues

- 5.26 A range of other issues were raised as follows:
- The importance of two main areas (providing information and enhancing provision) of TEF may change when subject-level TEF is introduced.
  - Discussion of the focus of HEs on research at the expense of teaching.
  - The role that the provision of information has in ensuring the transparency and accountability of HEIs.
  - The resource implications of the TEF. This included the high costs associated with the subject-level TEF, that the benefits of TEF are outweighed by its costs, and statements regarding the importance of keeping TEF costs down.
  - Discussion around the general purpose of higher education. This included the view that it is not just about meeting employer needs but should recognise the wider social contribution that students and HEIs make.
  - That the TEF should assess both past achievements and future enhancement (e.g. improvement and investment in the student experience).
  - Concerns about TEF being used for other purposes e.g. access to funding
  - Concerns that there could be a narrowing of academic endeavours and academic freedoms to promote innovation, creativity, and new thinking due to the focus of the TEF on employability.

### **Question 12**

- 5.27 Question 12 asked if there should be any other purposes for TEF. A total of 273 respondents answered this question (84%). The largest proportion of responses to the question proposed a view that there should be no other purposes for TEF. There was discussion of teaching standards and excellence and of HEI organisation, governance and policies. A sub-group of respondents outlined their opposition to TEF. The codes and emerging themes have been discussed below.

### No other purpose for the TEF

- 5.28 Many respondents answered simply to confirm that there should be no other purpose for TEF. The need for clear limits and boundaries around the TEF was highlighted, it was felt that this was important in order to ensure that the focus remained on enhancement. The importance of its purpose to enhance provision was re-iterated by many following their response to question 11b.

5.29 Reference was made to the potential for even greater confusion should the TEF be used for other purposes. This was stated specifically in relation to the introduction of subject-level TEF, and it was felt sufficient time should be allowed for it to become a more established framework.

5.30 Some respondents specifically stated purposes that they considered the TEF should not be used for including: league tables, to determine fees, to address government concerns, or for the awarding of grants:

*“There are many purposes to which TEF could be put, but on balance we believe that it should focus on doing one thing well rather than trying to serve many different purposes (and risk being sub-optimally designed for any one of those).”* Publicly funded higher education provider

#### Teaching standards and excellence

5.31 Some respondents discussed the potential for other purposes that relate to teaching standards and excellence. It was suggested that there is scope for the TEF to further reflect the impacts of teaching excellence and student outcomes. For example, this could be through us of a ‘value added’ metric, rewards for excellence, or to promote greater equity.

5.32 There was some support for the wider development of teaching, and of the HEI and employer relationship, as well as for raising the profile of HE teaching more generally.

5.33 There was discussion of TEF being used to help to support improvements in teaching performance, to promote discussion of teaching practice, and to share good practice between institutions.

#### Opposition to TEF

5.34 This question prompted some respondents to outline reasons for their opposition to the TEF, with this group stating that they could not see a purpose or place for the TEF. The main reasons for opposition were as follows:

- Concerns about the ‘marketisation’ of higher education.
- An adequate system for assessing quality is already in place e.g. the QAF in Wales.
- The perception that a single rating for HEIs is meaningless:  
*“If, as currently, TEF is used to place providers in a simplistic 3-tiered system, we would argue that this does not add anything useful to the information that is already available to students to inform their choices.”*  
Students/student bodies
- The TEF is not seen to be meeting its original aims.
- The high costs and resource requirements associated with the TEF.

### The organisation and structure of HEIs

- 5.35 In discussing other purposes for TEF some respondents stated that it provided opportunities to impact on the organisation and structures of HEIs. This related specifically to the status and role of teaching within the higher education sector. Additional purposes that were suggested included:
- The introduction of opportunities for HE staff to gain career progression or enhancement through TEF.
  - Consideration of how the TEF can be used to reward high performing institutions.
  - It provided an opportunity for HEIs to place a greater emphasis on rewarding quality teaching and to also achieve a better balance of reward between teaching and research.
  - The TEF provided a vehicle for celebration of the teaching and learning activities of HEIs.
  - The TEF can be used to encourage innovative approaches to improving teaching in the sector.

### The boundaries and limitations of TEF

- 5.36 In relation to the boundaries and limitations of TEF a few respondents considered that the original aims of TEF had changed. It was argued that ‘teaching excellence’ and ‘teaching quality’ are very different and should not be merged. Others stated that it would be a mistake for the TEF to drift into other areas and it was important that it retained the core aim of ‘enhancement of provision’.
- 5.37 Some respondents referenced the proposal of linking TEF to fees, stating strong opposition to this idea:

*“Original proposals to use increased fee-caps as an incentive for excellent teaching would load students up with further debt, act as an increased disincentive for the poorest students, and financially penalise those universities most in need of investment.”* Students/student bodies

### Other suggestions

- 5.38 Other suggestions for the purposes of TEF and proposed by a small proportion of the respondents related to the following themes:
- The TEF provided a source of data for HEIs that could be used to improve the student experience, share best practice and support internal quality assurance approaches.
  - A key other purpose was the marketing and communication of HE provision in the UK.
  - The TEF was also seen to provide opportunities for more meaningful engagement with students and to improved diversity in the sector.

## Email Responses

5.39 Fourteen responses were received by DfE outside the online consultation. Summary of this feedback has been provided below:

### The purposes of TEF

Feedback via email concurred with many of the views expressed via the online consultation. Areas of additional information from emailed responses have been included below:

- With specific reference to further education colleges, a view that the purpose of enhancement was more important than provision of information for those colleges that choose to participate in the TEF, was expressed. Furthermore, due to the administrative burden of TEF, it was considered that while many further education colleges will elect not to take part, they nonetheless will still choose to focus on enhancement.
- As further education colleges offer many part-time courses and serve local communities the TEF may have less relevance for students' decision-making. As single colleges collaborate with different HEIs, the TEF ratings will in many instances be variable (across FE colleges and their partners).
- There was some discussion regarding the TEF not being mandatory. It was stated that this was frequently overlooked, and it was noted that smaller providers are not required to take part (but can choose to opt-in). In relation to this it was emphasised that there should not be any "negative connotations" for those providers who choose not to participate.
- Success for TEF could be judged in relation to the number of gold rated institutions, however as improvements are made against the benchmark by all providers, relative positions (and thereby ratings) will remain stable:

*"A key indicator of success for the TEF would be that all providers could reasonably aspire to improve their provision and in due course achieve a gold rating. However, the process of benchmarking militates against this because as the metrics for all providers improve, the relative position of an institution is likely to remain unchanged. Therefore, although the quality of the provision had improved the TEF rating would not reflect that improvement."*

- One representative organisation proposed that provider-level TEF requires further development and that this should be a collaborative exercise to ensure buy-in from English providers, academics and with other UK countries. The need for a strategy to mitigate risks relating to the international reputation of UK providers was also proposed.
- With regards to recognition of the importance of teaching and the collaborative approaches necessary for improving teaching quality, it was argued career progression is harder for teaching staff (the link with an individual being less apparent) when compared to researchers:

*“However, improvements in education and student experience are often collaborative efforts, and it is harder to establish a link to individuals than for academics and research outputs. To this end it is still much easier, or at least perceived to be much easier, for an academic to establish career progression from research.”*

- With reference to the aim of TEF to ‘better meet the needs of employers, businesses, industry and professions’ the historic nature of LEO was seen as problematic, due to the difficulties around engaging academic staff with retrospective information. Furthermore, there was seen to be insufficient information around whether employer needs are actually being met by graduates. It was also noted with reference to the employability information generated by TEF, that prospective students often do not consider or research this area when choosing a provider (although with hindsight many would have).
- With reference to the low visibility of the TEF one respondent recommended that the OfS should do more to promote and market the TEF.

#### Other purposes for TEF

Email responses included some discussion of other purposes for TEF. Additional suggestions and proposals have been included below:

- To move the purpose of TEF away from the provision of information to instead provide support for enhancement activities in HEIs.
- The provision of support for students to make better use of information already available to them as an alternative to the production of additional information (via TEF).

*“Evidence suggests that rather than producing more information for prospective applicants, it would be better to support them to make more effective use of existing information... Early evaluations of the UNISTATS website by HEFCE found a number of participants expressed concerns about being overwhelmed by data.”*

- Similarly, a new information interface was suggested that is more ‘user friendly’, collates and synthesises information, supports searching by students and that offers guidance on use of the information.

#### Problems with TEF

Emailed responses discussed some of the perceived problems with TEF. In general, these concurred with the views expressed through the online consultation specifically in relation to concerns about: the measurement of teaching excellence in a complex and very diverse sector; that it is misunderstood by many students; that TEF was seen as a significant resource burden particularly for smaller providers; and concerns about the underpinning statistics.

One additional comment outlined a need for cost-benefit analyses to be undertaken particularly for subject-level TEF. It was stated that this would be needed in order to gauge whether the costs outweigh the benefits:

*“...it is important to evaluate TEF for the cost and burden for institutions versus the benefits this exercise will present to the students. This is particularly relevant for small institutions that do not have the resource or capacity to work on TEF submissions which can only become more demanding as part of subject TEF.”*

### Section Three: How Well Does TEF Work?

5.40 This section asked for views on the process by which ratings are determined under TEF and the sources of statistical information used within that process. It also asked respondents to comment on whether the processes and information used was fit-for-purpose and the most appropriate way of measuring teaching excellence.

#### Question 13

5.41 Currently TEF focusses on three aspects of quality – Teaching Quality, Learning Environment and Student Outcomes and Learning Gain (SO) – and there are 11 criteria mapped to these three aspects. Respondents were asked whether they think that the current criteria were appropriate and if not, what criteria would be more appropriate.

5.42 The responses given to the question “Are the criteria used in TEF appropriate?” are shown by each respondent group in Table 5.3 below:

**Table 5.3: Are the criteria used in TEF appropriate? (Question 13)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Publicly funded HE providers (n=121)	64	53%	52	43%	5	4%
Academic (n=86)	11	13%	70	81%	5	6%
Student/student bodies (n=28)	7	25%	20	71%	1	4%
FE college (n=17)	9	53%	8	47%	-	-
Representative Organisations (n=19)	5	26%	10	53%	4	21%
Other (n=46)	17	37%	21	46%	8	17%
<b>Total (n=317)</b>	<b>113</b>	<b>36%</b>	<b>181</b>	<b>57%</b>	<b>23</b>	<b>7%</b>

*\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.*

5.43 Just over half (57%) of all respondents indicated that they did not consider the current criteria to be appropriate. This was the majority view for all groups with the exception of publicly funded HE providers (over half (53%) felt that the current criteria were appropriate) and FE colleges (53% felt that current criteria were appropriate). There was strong feeling amongst academics that the current criteria were not appropriate – 81% said that the current criteria were not appropriate.

### Question 13b

5.44 A total of 251 responses were received to this question – 77% of all consultation respondents. Question 13b invited suggestions for what criteria would be more appropriate. Although a large number of references (183) were made that represented suggestions for appropriate criteria, the majority of the respondents focussed on the challenges of the current criteria (an overview of which is provided below).

#### Challenges in relation to Student Outcomes and Learning Gain (SO) criteria

5.45 The majority of criticism and challenge of the current criteria centred around the SO aspect – particularly in relation to the use of employment and earnings outcomes as a measure of teaching excellence. A large number of respondents felt that the criteria with SO should be reconsidered. It is important to note that many of the respondents who stated that the criteria were appropriate, caveated that by saying that they did not feel that the employment and earnings outcomes were appropriate. The main reasons for this included:

- **Not measuring teaching quality:** the majority of respondents felt that graduate employment destinations and earnings were not linked to the quality of HE teaching and therefore no link should be made between these two factors.
- **Influence of other factors:** respondents noted that employment and earnings were more closely linked to social, cultural and geographical factors – factors which were predominately not within the provider’s control. Particularly important factors noted as affecting employment destination and earnings were geographical location (of the provider and student home) and the socioeconomic background of the student.
- **Problems with available metrics:** the majority of respondents felt that there were issues with the current core metrics to measure the SO criteria, with particular criticism about the use of LEO. It was felt that LEO was too narrow a measure of employment and earnings, for example it does not reflect the social impact of some types of employment or those who are self-employed. Problems with LEO are discussed in more detail in question 14b below.

*“SO2 [employment and further study] is inappropriate as it penalises any vocational, less paid jobs such as farming, conservation or healthcare even though the work and skill level that students have to achieve is incredibly high which reflects with the teaching.”* Student/student body

*“There is insufficient evidence that employment outcomes are a measure of teaching excellence, as they are so heavily influenced by the individual student and industry context.”* Other

Challenges in relation to Teaching Quality (TQ) criteria

5.46 There were also criticisms in relation to the criteria used to measure the TQ aspect of quality. This was predominately related to the metrics used to measure the criteria, specifically the use of the NSS results. Many respondents felt that the NSS was not a suitable proxy for teaching quality and more accurate criteria were needed. Key challenges with the NSS included (these are covered in more detail in question 14):

- Respondents noted that students were not best placed to accurately assess teaching quality and do not know what constitutes best practice – the TQ criteria therefore only measures satisfaction and student perception on teaching quality.
- Low response rates and boycotting of the survey had impacted on the reliability of the data.
- Respondents highlighted research to suggest that student surveys were inherently biased towards certain groups of teaching staff, particularly around gender and ethnicity.

*“Student satisfaction is also not an appropriate measure of teaching quality, since there is little to no correlation between a student's reported satisfaction levels six months before the quality of the teaching received.”*  
Academic

*“The National Student Survey is a measure of satisfaction, rather than of quality.”* Other

Challenges in relation to the Learning Environment (LE) criteria

5.47 Only a small number of criticisms were raised in relation to the criteria for LE. Two key areas of criticism were raised in relation to these criteria:

- Respondents raised questions around the how continuation data was calculated and its use in measuring the criteria within LE.
- LE1 (resources) was felt to favour those providers with more resources and therefore not be comparable across different types of provider (e.g. HEIs and FE colleges).

*“Categories like resources and employment only reward institutions with existing social and economic capital. The TEF will contribute to widening inequalities.”* Academic

Other criticisms in relation to the criteria

5.48 Other, more general, criticisms of the criteria included:

- **Criteria were too subjective:** respondents noted that the criteria leave too great a need for the independent panel to make judgements about the teaching excellence at institutions. It was felt that there was too much room for different interpretations of the criteria.

- **TEF assessment process:** some respondents questioned the appropriateness of the assessment process and felt that the criteria could have been more appropriately measured via peer review and observations of teaching. Although noting the expense and logistical issues associated with this, it was felt that this would have given a more accurate reflection of teaching quality.
- **Teaching excellence cannot be measured:** some respondents noted that teaching excellence cannot be accurately measured and there were no suitable criteria for measuring it. It was therefore suggested that no attempt at doing so should be made.

*“A peer implemented approach freed from the distortions of offering reward for excellence and market driven approaches might enable a classroom observation approach which could powerfully identify and spread best practices.”* Other

*“We do not believe that there are any metrics available currently which demonstrate teaching excellence.”* Other

5.49 A number of respondents made reference directly to the metrics, rather than the criteria used within TEF – views on the metrics are discussed in greater detail in question 14. A small number of comments were made in relation to the link between the criteria and metrics. These included:

- The metrics were not felt to be aligned well with the criteria, which makes it difficult for the criteria to be effectively measured.
- There were suggestions that the metrics did not use relevant data to accurately measure the criteria.
- Concerns were raised around the balance between the different metrics, leading to the greater weighting of certain criteria – it was felt that greater weighting is given to the SO criteria.
- There was also a desire for greater clarity and transparency around the criteria and metrics – how they link together, the weighting of each and how they result in the ratings.

*“The criteria are reasonable, however there is not always a clear mapping from the criteria to the metrics.”* Publicly funded higher education provider

#### Suggestions for more appropriate criteria

5.50 Suggestions for more appropriate criteria to be included within TEF related to the following themes (which are discussed in more detail below):

- Learning gain.
- Teaching staff conditions.
- Wider student experience.
- Student impacts on society.
- Methods of teaching.

- Student views.

5.51 It is of note that many of the respondents felt that the above criteria should be used *instead of* and not *in addition* to current criteria.

5.52 The most commonly mentioned suggestion for additional criteria was the need for **'learning gain'** to be included. Respondents noted the importance of measuring value added and the distance travelled of students. It was felt that this would enable a greater understanding of the impact of a provider's teaching on students. Many of the respondents noted the potential challenges in defining and measuring learning gain, but felt it was an important consideration.

*"In these cases, the focus is more on the difference that excellent teaching has made to student engagement with their learning; here, 'value-added' measures linked to learning gain and 'distance travelled' for student learning are key."* Publicly funded higher education provider

*"We would like to see the outcomes criterion defined robustly in terms of learning gain, thereby recognising the transformative effect of higher education on the lives of individuals, especially those from disadvantaged backgrounds."* Publicly funded higher education provider

5.53 Suggestions were also made in relation to the need for factors relating to **staff conditions** to be included – it was felt that the morale and treatment of staff can greatly impact on teaching quality and the student experience. Suggestions of criteria to be measured included:

- Employee retention.
- Pay and pensions.
- Staff contracts (e.g. fixed term or permanent).
- Qualifications of staff members.
- Access to training and opportunities for continuing professional development (CPD).
- Staff morale.

*"The criteria should recognise those institutions which have invested in appropriate training and qualifications for their academic teaching staff."* Publicly funded higher education provider

*"In terms of specific suggestions in relation to the learning environment, we believe that there should be greater focus on staff working conditions, notably contractual status, as one of the main indicators."* Representative organisation

5.54 Some respondents noted the need for the criteria to encompass a greater focus on the **wider student experience**, for example to include welfare and support available, extra-curricular activities and student groups or bodies available, and the mental health and wellbeing of students. Respondents noted that the criteria focused on a very narrow definition of teaching quality and learning environment and failed to take into account other important factors that could have a strong influence on personal development and future outcomes.

*“A wider view of student experience would capture the types of activities outside the core programme which allow students to grow as rounded and self-motivated individuals. Students can develop and demonstrate inter-personal and leadership skills which are demanded by postgraduate courses and graduate employers alike.”* Publicly funded higher education provider

5.55 The criteria being too narrow a measure was also reported in relation to SO – particularly employment – where it was felt that the broader range of **benefits that graduates bring to society** (e.g. social and cultural) should be measured.

5.56 Some respondents noted the importance of criteria that looks at **methods of teaching** used by providers, for example independent learning and co-production of the curriculum. It was felt that this could potentially counter any disincentive TEF may have on providers to develop innovative ways of teaching and any potential incentives to ‘spoon-feed’ students to improve TEF rating.

*“There needs to be something on valuing independent learning ideally - there is a risk at present of TEF encouraging spoon-feeding.”*  
Student/student body

5.57 As noted above, there was strong opposition to the use of the NSS in capturing **student views**. However, many respondents noted the importance of maintaining the student voice within the TEF criteria.

#### **Question 14**

5.58 As at this time there was no direct measurement of teaching quality, meaning TEF was using existing data as an indirect or proxy measure of teaching quality. TEF was using 10 core metrics (produced by the OfS) as proxies to assess the criteria. Questions 14 asked respondents for their view on whether the metrics used were the best proxies for measuring the TEF criteria (question 14a) and if not, what metrics would be more suitable (question 14b).

#### **Question 14a**

5.59 Responses to the question “Are the metrics used in TEF the best proxies for measuring the TEF criteria?” are shown below in Table 5.4.

**Table 5.4: Are the metrics used in TEF the best proxies for measuring the TEF criteria? (Question 14a)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Publicly funded HE providers (n=121)	13	11%	102	84%	6	5%
Academic (n=86)	5	6%	77	90%	4	5%
Student/student bodies (n=28)	5	18%	20	71%	3	11%
FE college (n=17)	5	29%	12	71%	-	-
Representative Organisations (n=18)	1	6%	15	83%	2	11%
Other (n=47)	6	13%	33	70%	8	17%
<b>Total (n=317)</b>	<b>35</b>	<b>11%</b>	<b>259</b>	<b>82%</b>	<b>23</b>	<b>7%</b>

*\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.*

5.60 Over three quarters (82%) of all respondents felt that the metrics used within TEF were not the best proxies for measuring the TEF criteria. This was a feeling held by all respondent groups – with over two-thirds of all respondent groups taking a negative view on the current proxies.

#### **Question 14b**

5.61 A total of 284 responses were received to this question – 87% of all consultation respondents. A small number of respondents felt that the current metrics were the best proxies available for measuring the TEF criteria without the need for additional sector-wide data collection. However, the majority of respondents to this question focussed on why they felt that current metrics were not the best proxies for measuring the TEF criteria.

5.62 Although this question asked “What metrics would be more suitable proxies?”, the majority of respondents reflected suggestions for *criteria* that should be measured rather than providing detail on what metrics would be more suitable proxies.

#### Not measuring teaching excellence

5.63 One of the most commonly mentioned problems with the current proxies was that they were felt to not actually measure teaching excellence. Respondents noted that the proxies used within TEF are a more accurate measure of student outcomes (e.g. employment destinations), rather than measuring the actual quality of the teaching received. Comments were particularly raised in relation to the absence of a measure of learning gain.

#### Criticisms of the proxies for measuring Teaching Quality (TQ)

5.64 While many respondents noted the importance of gathering the student voice within the TEF assessment process, concerns were raised in relation to the use of the NSS as a proxy. This was the most commonly mentioned problem in relation to current proxies. Concerns included:

- It was frequently noted that the NSS is a measure of student satisfaction and experience, rather than a direct measure of teaching quality.
- Respondents noted that students are not qualified or experienced to assess teaching quality, due to lack of other experiences and knowledge of what constitutes 'good practice'.
- It was noted that the NSS only gathers the views on final year students and so feedback is not received across all years of provision.
- Research evidence was highlighted to suggest that responses to student satisfaction surveys are inherently biased. Biases identified included:
  - A view that certain teaching professionals, related to gender (female), age (younger), ethnicity (BAME) and socioeconomic background (e.g. those from a lower socioeconomic background).
  - More intellectually challenging courses/modules or those typically considered less interesting e.g. research methods.
- Responses to the NSS were noted as being very individual and specific to providers, meaning results are not comparable across the sector.
- Poor completion rates and boycotting of the NSS also meant that the results for some institutions were very small.
- The perceived link between NSS results and tuition fee rises had also led to some students giving negative feedback within the survey.

*"The use of the NSS is especially flawed. NSS scores are not designed to provide, and methodologically are incapable of allowing comparison across institutions. There is no way of knowing how students use criteria concerning level of assessment and feedback in the NSS."* Other

*"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."* Representative organisation

#### Criticisms of proxies for measuring Learning Environment (LE)

5.65 In addition to the comments noted above in relation to the NSS, respondents focussed on perceived problems with using continuation rates as a core metric. Key issues reported included the view that:

- Continuation rates were not felt to be directly linked to the learning environment or teaching excellence. Factors of greater significance were felt to be:
  - The availability and quality of a provider's pastoral support.
  - A student's personal and financial circumstances.
- Inclusion of continuation rates could incentivise providers to retain students when it is not in their best interest. There is also the possibility that providers could look to lower the criteria needed for students to progress to future years.

*“The continuation metric also does not necessarily reflect the learning environment at any given provider and does not take into account the complex issues which often determine a student’s decision not to continue their studies.”* Student/student body

Criticisms of proxies for measuring Student Outcomes and Learning Gain (SO)

5.66 There was strong opposition within the responses to the use of employment and earnings as proxy measures of SO. It was felt that employment and earnings are influenced by many other factors to a greater extent than the quality of teaching – it was frequently suggested there is no direct relationship between teaching quality and employment/earnings. The proxies, it was noted, place too much weight on student outcomes, which cannot be directly linked to teaching quality.

*“They [the current proxies] measure neither teaching quality nor teaching excellence. As proxy measures they ignore other factors other than teaching that may affect a students’ outcomes. For example, an individual student’s continuation may be affected by a multiplicity of factors (health, finance, caring responsibilities, employment and more) and is never solely influenced by teaching quality.”* Publicly funded higher education provider

5.67 There was also strong opposition to the use of LEO as a proxy, with the majority of respondents suggesting it should be removed from the core metrics. Key issues raised in relation to LEO included:

- Its lack of benchmarking for the full range of factors that influence employment and earnings. These include:
  - Geographical location and strength of the local labour market.
  - Socioeconomic background of the student.
- It does not take into account the motivations students have in studying higher education, for example some graduates do not strive to work in a high-earning role.
- Linked to this, LEO does not account for the social value of some sectors of employment, meaning providers are disadvantaged within LEO data by having socially valuable, but low earning graduates.
- The historic nature of the data when it is used within the TEF assessment process.
- Data for international students is not included within LEO.

5.68 Criticisms were also made in relation to the use of the Destination of Leavers from Higher Education (DLHE) as a proxy measure of the TEF criteria, including:

- The current Standard Occupational Classification (SOC) codes used within the DLHE were felt to be problematic, as these were not felt to reflect the structure of the current labour market, take account of the personal circumstances of graduates or reflect the social value of some sectors of employment.

- There were also felt to be problems around defining ‘highly skilled employment’.
- Analysis of the data did not include contextual information – for example, many graduates go on to work in fields completely unlinked to their degree subject.
- The inclusion of the DLHE as two of the core metrics was felt to give it too great a weighting.

*“Inclusion of two metrics based on DLHE provides too great an emphasis on this survey...” Other*

*“The SOC codes used in the DLHE metrics militate against forms of employment that are socially useful but not classified as highly skilled and the time frame is too short for graduates in areas with restricted employment opportunities who need to remain close to home because of family ties and/or caring responsibilities to acquire highly skilled jobs.”  
Student/student body*

Other problems with the current proxies

5.69 Some respondents focussed on problems with the **collection and analysis of the data gathered by the core metrics**. These issues were felt to reduce the reliability of the data, including:

- Issues were raised in relation to the time lag of some of the data used. This was particularly raised in relation to the LEO data.
- Issues using established national data sets that were not intended for the purposes of TEF could create misleading results.
- Questions were also raised in relation to the statistical analysis, including the use of z-scores and the techniques that lead to the creation of flags.

*“With the exception of the NSS data, there is a considerable time-lag in terms of the data that is used. This is particularly true of the employment data and the increasing emphasis on LEO, since the data do not reflect the current state of the provider but rather what was going on several years ago.” Publicly funded higher education provider*

5.70 Concerns were also raised in relation to the **weighting and balance** between the different metrics. For example, it was noted that the employment/earnings outcomes and NSS results account for nearly all of the core metrics.

5.71 Comments were made in relation to use of **grade inflation data**, including:

- It not being a good proxy for teaching excellence, as it could be influenced by a wide range of factors and cannot be linked to the quality of teaching.
- Using grade inflation data could potentially disincentivise providers to award higher grades, even where this is justified.
- Labelling improvements in grades as ‘inflation’ has the potential to mask any actual improvements, which could be linked to improvements in the quality of the teaching.

*“We disagree strongly with the use of grade inflation in TEF in any way. Grade inflation as a metric should only be used by the regulator to protect against the potential motivation for providers to inflate grades to meet regulatory requirements. It should not be used as a proxy for or against excellence.”* Other

*“Suggesting that grade improvement has simply been due to grade inflation does not encourage or recognise the great learning progress that our students make or the concerted effort by institutions to invest in teaching and learning activities.”* Publicly funded higher education provider

#### Valid proxies do not exist

- 5.72 Some respondents stated that there were no valid proxies for measuring teaching excellence. Typically, these respondents noted the difficulties in defining teaching excellence and problems accounting for the diversity of providers, students and experiences.

*“No metrics can provide an accurate picture here, except in the broadest terms.”* Academic

*“Metrics simply do not work for evaluating teaching sensibly and should not be used.”* Academic

- 5.73 A small number of respondents also felt that as there were no valid proxies, the measurement of teaching excellence should not take place and TEF is therefore unnecessary.

#### Suggestions for alternative measures of teaching excellence

- 5.74 Although this question asked “What metrics would be more suitable proxies?”, the majority of respondents made suggestions for criteria that should be measured (question 14 above), rather than providing detail on how these factors could actually be measured. As with question 14 above, the most common suggestion for additional criteria was a metric to measure learning gain and value added – though in the main respondents did not provide any detail on how this could be measured or what would be appropriate metrics.

- 5.75 The following suggestions were made in relation to improvements to the use of proxies and metrics to measure teaching excellence:

- It was felt that taking a more nuanced approach to the analysis of the current metrics, including viewing the data within a greater context and more benchmarking of the data, would be beneficial.
- There was felt to be a need to revise the questions asked within the NSS and look at ways to increase its relevance to the TEF criteria. Suggestions were also made to re-run the survey around 5-10 years after graduation to get a longer-term view of student perceptions on teaching quality.
- The need to move away from a metrics-based assessment towards greater use of qualitative measures of teaching quality. Some respondents felt that this should be in the form of teaching observations.

- Other respondents noted the need to assess teaching quality through the use of external examiners and the moderation of student work.
- The need to develop specific measures to assess teaching excellence, rather than using proxies, although noted that this would not be straightforward process.

*“There should be a direct way of measuring teaching quality that includes what happens in the lessons, for example lesson observation data either from within the University or via external, unannounced observations carried out by a TEF observation team.”* Further education college

*“Asking graduates for their opinion of teaching and indeed their universities five years after graduation, when they are in a better position to judge the efficacy of the teaching. Rewriting the NSS to ask better questions.”* Academic

### Question 15

- 5.76 Current TEF metrics are benchmarked to account for factors such as the subject of study, prior attainment, ethnicity and education disadvantage of the provider’s student intake. Question 15 asked respondents whether they agreed with the need for benchmarking to take place (question 15a), and if the current benchmarking process accounted for the right factors (question 15b).

### Question 15a

- 5.77 Responses to the question “Should the metrics be benchmarked to allow for difference in a provider’s student population?” are shown below in Table 5.5.

**Table 5.5: Should the metrics be benchmarked to allow for difference in a provider’s student population? (Question 15a)\***

Respondent group	Yes		No		Don’t know	
	Number	Percent	Number	Percent	Number	Percent
Publicly funded HE providers (n=120)	106	88%	10	8%	4	3%
Academic (n=84)	56	67%	14	17%	14	17%
Student/student bodies (n=28)	26	93%	1	4%	1	4%
FE college (n=16)	16	100%	-	-	-	-
Representative Organisations (n=18)	16	89%	2	11%	-	-
Other (n=46)	38	83%	3	7%	5	11%
<b>Total (n=312)</b>	<b>258</b>	<b>83%</b>	<b>30</b>	<b>10%</b>	<b>24</b>	<b>8%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

- 5.78 The majority (83%) of respondents felt that the metrics should be benchmarked to allow for difference in a provider’s student population – this was the case across all respondent groups.

### Question 15b

5.79 Many respondents to question 15b<sup>13</sup> reiterated the view that benchmarking should be used and is an important part of the TEF assessment process. Reasons for this included:

- Importance of benchmarking in supporting the widening participation agenda and ensuring TEF does not disincentivise providers to recruit students from these groups.
- It ensures a wide range of factors that affect student outcomes are taken into account, rather than solely focussing on teaching quality.
- It enables comparisons across providers and helps providers gauge their position in relation to others in the sector.

*“Provider-level benchmarking is an important component of TEF as it has been proven that the background characteristics of the student population influence educational outcomes.”* Publicly funded higher education provider

5.80 A small number of respondents felt that benchmarking should not be used. The main reason for respondents taking this view was either that they considered there to be insurmountable problems with the process of benchmarking, or they reiterated their view that metrics should not be used at all in the measurement of teaching excellence.

5.81 Question 15b asked respondents whether TEF currently benchmarks for the right factors. More respondents (241 references) noted that the TEF does not benchmark for the right factors than felt that it does (90 references). Reasons for this are discussed below.

#### Issues with the current benchmarking process

5.82 One of the main issues noted with the benchmarking was the lack of transparency with the process and the subsequent lack of understanding about the process and its results. Key points raised included:

- Absence of information about which providers were being benchmarked against each other.
- Lack of clarity around the formula and statistical approach taken within the benchmarking process.
- Concerns were also raised around the robustness of using the participation of local areas classification groups (POLAR)<sup>14</sup> and Index of Multiple Deprivation (IMD) as a measure of socioeconomic disadvantage.
- Inconsistency in the approach to benchmarking, for example not all benchmarking criteria are applied to all of the metrics.

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<sup>13</sup> 262 responses were received to this question - 80% of all consultation respondents.

<sup>14</sup> For more information see: <https://www.officeforstudents.org.uk/data-and-analysis/polar-participation-of-local-areas/>

5.83 It was felt that these issues caused confusion and misunderstanding, and respondents questioned whether the results of the benchmarking were useful for students and providers. Respondents noted that they would welcome clearer guidance to help providers and students understand the process and how to interpret the results.

*“On benchmarking, the process seems to be opaque, and many of the academics at my institution have been confused by it. There is no good explanation for how benchmarks are derived - the one that is cross-referenced in the TEF guidance does not apply to TEF.”* Other

*“We are concerned that benchmarking obscures the data from a student perspective, and consequently undermines the objective to provide reliable and useful information to students.”* Publicly funded higher education provider

5.84 A number of respondents also made comments in relation to the statistical methods used within the benchmarking process. As an independent expert view of the statistical information used within TEF has been commissioned separately, this section contains only an overview of the comments provided:

- There was a recommendation that the absolute values should be removed, as they have the potential to mislead students and providers and do not add anything to the benchmarking process.
- The process of assigning ‘flag’s for demographic groups was also felt to need some consideration. It was noted that the statistical method used for awarding a flag means that, the smaller the student population, the harder it is to achieve a flag.

*“We believe that the absolute values should be removed from the TEF process. They add little to the benchmarked metrics and add an unnecessary complexity.”* Publicly funded higher education provider

#### Need to greater range of factors within the benchmarking process

5.85 A large number of respondents noted the need for TEF to incorporate a greater range of factors within its benchmarking process. The most commonly mentioned addition was the need for benchmarking by geographical location. This (as detailed above) was particularly felt to be important in relation to the employment and earnings metrics, as local labour market conditions can have a significant impact on the results.

*“Location of the institution and where students move to post graduation. Non-London-based institutions are disadvantaged when it comes to LEO salary data.”* Academic

*“The LEO metric on salary does not benchmark for region of employment, which - due to regional salary differentials - is a significant disadvantage to all institutions outside London (as our students naturally go into jobs based in the North, where salaries are considerably lower).”* Other

5.86 Suggestions for other factors to be benchmarked included:

- The delivery model of the course (e.g. part-time course, distance learning and foundation degrees).
- The provider type (e.g. FE college or HEI).
- Staff to student ratio and contact time per week.
- Widening participation factors e.g. disability, sexual orientation, age, A-level tariff and socioeconomic status<sup>15</sup>.
- Employment data was felt to be needed to be benchmarked by a greater number of factors, including societal value of job and socioeconomic background of the student.

### **Question 16**

#### **Question 16a**

5.87 The current TEF process uses both quantitative evidence (e.g. the core metrics) and qualitative evidence (e.g. the written submission). Question 16a asked respondents for their views on the current balance of quantitative and qualitative evidence in arriving at the ratings.

5.88 Headline findings from the coding of the qualitative responses to this question are:

- 293 of 326 (90%) of respondents provided an answer to this question.
- More respondents (110 compared with 69) felt that the balance between quantitative and qualitative evidence in arriving at the TEF ratings was incorrect.
- Respondents were most likely to say that they welcomed the TEF assessment process incorporating both qualitative and quantitative data and there was a need for incorporation of both to remain.
- There appears to be strong support for an equal weighting of qualitative and quantitative evidence, with many respondents suggesting the balance is currently weighted in favour of the quantitative evidence.
- A small number of respondents noted issues with both types of evidence and advocated abandoning TEF.

5.89 Reasons for respondents stating that the current balance between quantitative and qualitative data is incorrect included:

- Linked to the positive role of the written submission (see 'Importance of qualitative evidence' below), the qualitative evidence, it was felt, should be given greater weight and not be considered as an added extra.

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<sup>15</sup> The Independent Review thought readers may find it helpful if the report included a footnote here to clarify that some of these factors are partly captured by the current TEF process. Age is already included in the TEF benchmarking process for all metrics. Some of the other factors listed here are also included in the benchmarking process, but only for certain metrics. These include: disability, entry qualifications and educational disadvantage (POLAR).

- Both types of evidence were not considered together at the start of the assessment process. Concerns were raised over the initial hypothesis being based solely on the quantitative data, as it was felt this gives the data greater weight and sets the tone for the quantitative nature of the assessment process.

*“The use of core metrics to generate an Initial Hypothesis leads to too great an emphasis on the role of the quantitative data, given that this data is (and can only ever be) a broad proxy for educational quality.”*

Publicly funded higher education provider

*“The quantitative evidence should be reduced, and the qualitative evidence should be, well, of higher quality: interviews with students and teachers, increased observation of lectures and seminars, evaluations by eminent researchers in the field (because there is no “quality” teaching that is not underpinned by adequate knowledge of the state of research in a given field.”* Academic

#### Importance of qualitative evidence

- 5.90 Many respondents noted the importance of using qualitative evidence within TEF. It was felt to be an important way of providers highlighting their improvements and enhancement, which may not automatically be apparent from the quantitative results. It was also felt that the written submission enables providers to offer contextual detail to explain the quantitative data.

*“The written submission is an essential element in the process from a provider perspective, as the data does not always reflect fully the current student experience and continuous improvement by the provider.”*

Student/student body

#### Challenges with current qualitative evidence

- 5.91 Although the vast majority of respondents noted the importance of using qualitative data within TEF, a number of challenges were noted in relation to its use:

- There was also the potential for smaller and/or less well-resourced providers to be disadvantaged by the amount of time and staff resource needed to complete the written submission.
- There was felt to be a lack of clarity around how the written submissions were assessed, what the independent panels are looking for and how the submission contributes to the overall rating.
- Some concerns were raised that the assessment of the submission is too subjective and there is a risk that its role in TEF becomes a creative writing exercise.
- There was at this time no validation or sharing of the written submissions, so providers had to trust the judgement of the independent panels.
- The length of the submission was felt to be too short to enable providers to provide sufficient contextual detail and meaningful evidence to supplement the quantitative evidence.

*“The outcome of the TEF may be influenced by the amount of money that an institution may have to invest in the submission writing.”* Further education college

*“There is a risk that the rating ends up being a product of the skill of the institutional group preparing the submission!”* Student/student body

- 5.92 Two suggestions were made in relation to addressing these problems: firstly, providing greater support to providers to aid their completion of the written submission. This could also include provision and use of a common template. Secondly, suggestions were made that all submissions should be independently assessed and verified to ensure consistency and comparability across providers.
- 5.93 Some respondents also noted that greater incorporation of the student voice within the qualitative evidence (e.g. having a separate submission written by students/student bodies) would be beneficial.

#### Challenges with current quantitative evidence

- 5.94 Challenges were raised in relation to the use of the core metrics in the measurement of teaching excellence. This has been discussed elsewhere in this report (see question 14b).

#### Transparency

- 5.95 Some respondents noted the need for greater transparency in the balance between the qualitative and quantitative evidence, as this was felt to be currently unclear. It was felt that there should be greater external scrutiny of both the qualitative and quantitative evidence and more guidance should be provided on the weighting of each and how this is linked to the ratings.

*“It is not clear what the balance between the two aspects is when the assessors make their judgement.”* Academic

*“There is lack of clarity regarding the balance between the two. We have heard the balance described differently by different people, which raises concerns about the transparency and consistency of decision-making. It would be helpful for providers to be able to access published criteria used by panels.”* Publicly funded higher education provider

#### **Question 16b**

- 5.96 There were 231 responses (71% of all respondents) to the question “Are there any other aspects of the process that you wish to comment on?”. In the main, these reiterated points that respondents had made to other questions. The key areas that were reiterated included:

- Lack of transparency with the TEF assessment process, including benchmarking, assessment of the written submission and process to arrive at the ratings.
- Greater need for benchmarking, particularly around geographical location of the provider.
- Need for greater support for providers to help them with the writing of the written submission.

- Importance of incorporating teaching observations within TEF.
- The need to revise the criteria and metrics.
- Criticisms of the NSS and LEO and their use as a core metric.
- Issues with the core metric data in terms of time lag, so TEF is measuring historical performance.
- Time and resource burden of the current TEF process (see below sections for discussion of this).

5.97 The following suggestions were also made to improve TEF:

- Allowance of greater time for providers to plan and produce their TEF submission. It was also felt that information on the process and any changes should be received with enough time for providers to work with.
- The need for some consistency and stability in TEF and ensuring that too many changes to the process are not made at once.
- Considering the timing of TEF, especially linked to the timing of the REF. It was also suggested that the TEF should like on an assessment cycle, similar to the REF and be less frequent.
- Consider how the TEF and REF could be linked and aligned, potentially into one submission.
- The Government should provide guarantees that there is, and will not be in the future, a link between TEF rating and tuition fee rises.

#### Subject-level TEF

5.98 Although the questions in this question asked for providers' views on both provider and subject-level TEF, in the main respondents focussed on provider-level TEF – therefore responses related to subject-level TEF have been combined below.

5.99 The respondents were largely negative about the introduction of subject-level TEF, for the following reasons:

- Increased time and resource burden on providers – this was particularly raised in relation to the written submissions. It was felt that subject-level TEF could result in a greater number of resources being diverted away from teaching and learning.
- Problems with the proposed subject CAH2 groupings, particularly in terms of subject groupings being too broad and not taking into account interdisciplinary programmes. This had the potential to mislead students when considering the subject-level ratings.
- Some respondents noted that the current length of the submission for subject-level TEF was not long enough and did not allow providers to outline contextual factors in enough detail.

- There were concerns that many providers may have courses with very small numbers of students, which could impact on the robustness of the data and put them at a disadvantage.
- Respondents noted that subject-level TEF would not add any additional insight and benefit above and beyond that of provider-level TEF.

*“In relation to subject TEF (the University is a participant in the second year pilot), the 2 page provider submission does not provide sufficient opportunity to fully explain the institutional context and how this impacts at subject-level and so there is an over reliance on quantitative metrics which are not aligned with the criteria.”* Publicly funded higher education provider

*“Similarly aggregation into large more ‘generic’ subject groupings can be problematic, especially when it cuts across disciplines and organisational structures, but more importantly where it ‘averages out’ gold performing and bronze performing courses.”* Publicly funded higher education provider

### Email responses

#### Appropriateness of the TEF criteria

The view on the appropriateness of the TEF criteria echoed the responses submitted online – i.e. that the criteria were not appropriate. A small number of suggestions were made in relation to more appropriate criteria. As with the online responses, learning gain/distance-travelled and incorporating the wider student experience were felt to be important.

*“TEF also needs to include a wider assessment of the educational experience such as learning support, course organisation and management and extracurricular opportunities. It is important that this is built into the assessment process as prospective students need to gain a holistic view when choosing the sort of HE experience that most suits their needs.”*

#### The suitability of the metrics:

As with the online responses, criticisms were made in relation to the metrics. They reiterated the online respondents’ comments that the metrics as proxies were not currently appropriate for the measurement of teaching quality. This included:

- Use of employment and earnings outcomes does not directly link to teaching quality and are dependent on many other non-provider related factors;
- Problems with LEO data, including lack of geographical benchmarking and absence of international students from the data;
- The need to review the balance of the metrics;
- Problems with using NSS results as a core metrics, as this does not reflect teaching quality but student satisfaction;
- Problems with the use of grade inflation data, which was felt to not be a measure of teaching quality;

- The need for greater transparency around the metrics used to help providers and students have a better understanding of the process.

*“The TEF use of salary measures as the sole metric evaluating the benefit of a degree is a concern and should be balanced against other benefits both to the individual and society.”*

*“Relying on a learner’s perception of a course’s value through the NSS has risks as students may not yet have appreciated the value of the transformative education they have received.”*

*“Fundamentally, do the metrics input to TEF measure quality of teaching? Do the provider submissions measure teaching quality? We are sceptical. There may be some distant indirect association, but what robust research been carried out to assess this? Alternatives might be to rename TEF (to remove ‘teaching excellence’), or actually carry out some evaluation of teaching quality (which would be expensive).”*

#### **Benchmarking process:**

The majority of the responses submitted via email made criticisms in relation to the benchmarking methodology used within TEF, although in principle they agreed with its use. These criticisms included:

- Problems with the awarding of very high and low absolute values;
- Problems improving within the benchmarked figures;
- Small data-sets risk by determine by small year-on-year fluctuations;
- Greater range of factors should be included within the benchmarking process;
- Lack of information about HEI groupings for the benchmarking;
- Lack of transparency around the benchmarking process.

*“Benchmarking is a key component of the TEF metrics. However, while this gives an impression of statistical rigour, the decisions on what factors to include when conducting the benchmarking seem to have an element of arbitrariness. This raises questions regarding the level of objectivity as different factors are used to produce the benchmarking for different metrics and the rationale for their selection is not clearly explained.”*

#### **Use of qualitative and quantitative evidence:**

Email responses reiterated comments made by online respondents in that there was a need for both qualitative and quantitative data within the TEF assessment process. They echoed views that greater use of qualitative evidence within TEF would be welcomed to ensure that it was not a metrics-informed assessment.

*“It is certainly helpful that the entire assessment is not driven by metrics and it offers the opportunity to providers explain the metrics where necessary and provide a contextual narrative.”*

*“The TEF assessment process as currently configured is too dependent on metrics and the “initial hypothesis” they generate.”*

## Section Four: Are the ratings right?

5.100 Currently the TEF has three ratings gold, silver and bronze. A provisional award is given to providers that meet national quality requirements but do not have sufficient data to be fully assessed.

### Question seventeen

5.101 Respondents were asked for their views on these ratings in relation to whether a single rating (17a); the three differentiations and provisional (17b), and the ratings names (17c) meet the purpose of TEF. Each of these will be considered in turn.

### Question 17a

5.102 The responses given to the question “Are the purposes of TEF met by awarding a single rating?” are shown by each respondent group in Table 5.6 below:

**Table 5.6: Are the purposes of TEF met by awarding a single rating? (Question 17a)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Publicly funded HE providers (n=118)	35	30%	75	64%	8	7%
Academic (n=86)	12	14%	65	76%	9	10%
Student/student bodies (n=27)	5	19%	19	70%	3	11%
FE college (n=17)	11	65%	6	35%	-	-
Representative Organisations (n=16)	3	19%	11	69%	2	13%
Other (n=46)	19	41%	22	48%	5	11%
<b>Total (n=310)</b>	<b>85</b>	<b>27%</b>	<b>198</b>	<b>64%</b>	<b>27</b>	<b>9%</b>

*\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.*

5.103 Nearly two thirds (64%) of all respondents indicated that the purposes of TEF were not met by awarding a single rating. This was the majority view for all groups with the exception of FE colleges (nearly two thirds (65%) of FE colleges agreed that the purposes were met by a single rating). Across all respondents, academics, student/student bodies, representative bodies and publicly funded HE providers were more likely to state ‘no’ to this question when compared to other groups.

5.104 A total of 255 text responses (78% of all respondents) were received for this question. These responses mainly related to discussion of the limitations of having a single rating followed by discussion of alternatives to a single rating. Recurring themes were identified in relation to each of the codes as detailed below.

### The limitations of having a single rating

5.105 The limitations of having a single rating that were identified by respondents have been included below:

- A single rating cannot effectively capture the complexity and variety of teaching:

*“Different institutions or programmes may have different strengths and different outcomes, and a single rating does not tell the student much about the appropriate fit.” Academic*

- Having a single rating is not appropriate for higher education – some respondents discussed the inappropriateness of ‘medals’.
- Concerns were expressed that there is scope for the rating to be ‘gamed’ by universities:

*“My university gamed the system by leveraging its initial silver to gold. The university experience is too nuanced to be reasonably summarised like this.” Academic*

- A view that the single rating is too simplistic and therefore meaningless.
- The single rating does not reflect different quality between departments within a single HEI.
- The single rating is meaningless or misleading because all providers are already required by the OfS to meet the quality threshold.
- Having a single rating promotes ineffective student choice (and it is more likely to be based on heuristics).

#### The meaning and interpretation of awarding a single rating

5.106 Some responses discussed the meaning and interpretation of awarding a single rating for the TEF. Concerns were raised about the competition between institutions that is generated by having a single rating, others outlined that a single rating would be misinterpreted as it does not reflect complexity or provide sufficient information for students to use in relation to their decision-making. Similarly, some noted that a single rating could be misleading if students did not have an understanding of, or information about, the data on which the TEF is based.

5.107 In contrast to this some respondents argued that having a single rating ensured that students were not confused and being asked to interpret complex information:

*“On this basis we support the award of a single rating and a limited range of differentiation levels as anything more complex could confuse prospective students. With that said, an inherent limitation of any such rating system is that there can be no guarantee that the rating awarded to an institution will always match the quality of teaching it delivers (i.e. not every student at a gold rated school will receive gold standard teaching).” Representative organisation*

5.108 How employers interpret the single rating was discussed by a few. Evidence indicating that students had concerns about their potential employment prospects if their institution was not awarded gold was mentioned.

5.109 Concerns were expressed by some respondents that a bronze rating was likely to be interpreted as a poor-quality rating (even though the OfS registration process required for all HE providers involves a quality assessment).

Single rating straightforward or simple

- 5.110 In response to this question a view that having a single rating was both simple and straightforward was expressed by some. A single rating it was argued would avoid confusion and be most easily understood by all stakeholders. It was noted that due to the large volumes of information already available to students, it is important that it remains both clear and simple:

*“To be of value and achieve the stated aims of TEF, the ratings needs to be as clear and simple as possible. Prospective students are already dealing with an increasing amount of information in a range of formats when making their institution and subject choices. Adding more complexity to the ratings could hinder rather than help choice.”* Publicly funded higher education provider

A single rating is right for the purposes of TEF

- 5.111 Although with some similarities to the code above, respondents coded to ‘a single rating is right for the purposes of TEF’ stated that this was the right approach for the TEF. In this group the single rating was supported as the ‘preferred’ option and as offering the most useful approach. A few stated that they could not suggest any alternatives:

*“We feel that the purpose of TEF are met through the single rating. A conversation about single and multiple ratings could be extensive. The founding purpose of the TEF was student information and enhancement – the focus on student information could be lost through increasing complexity.”* Publicly funded higher education provider

The range of HE teaching is not reflected

- 5.112 Some respondents discussed the issue that a single rating does not reflect the range or complexity of teaching provided across the HE sector. Teaching quality it was argued is unlikely to be uniform within a single provider, and what constitutes ‘excellence’ may be vary between different providers:

*“Teaching excellence is complex, and what is 'excellent' varies from provider to provider, depending on their cohort. A single rating reduces the process and supports victory narratives rather than the development of teaching excellence.”* Further education college

Borderline cases and distinction between ratings

- 5.113 There was some discussion of the issue of borderline cases when allocating ratings. Many felt that there was insufficient differentiation between the ratings and that they do not reflect all areas of excellence within a given provider. The main issues raised have been included below.

- There were challenges associated with making a comparison between a gold and a silver rating.
- The differences between providers at the borderline could be significant:

*“Our [name of HE provider] Student Union are concerned that the three ratings of gold, silver and bronze is not wholly beneficial for students, as the difference between the various providers can be quite significant – especially those that are borderline.”* Publicly funded higher education provider

- HE providers that have a bronze award may have some excellent degree programmes while those with a gold award may have some poorer performing degree programmes.
- The three different ratings create ‘cliff edges’.

#### Alternatives to awarding a single rating

5.114 In their response to this question some suggested alternatives to the use of a single rating. The main alternatives identified by respondents have been included below.

- Use of a more diverse range of indicators e.g. a dashboard of ratings, graded ratings.
- Scaling systems e.g. scores from 0-10.
- Use of TEF as a kitemark for teaching (a recognition of quality):

*“A single rating, as a kite-mark of teaching excellence within a diverse sector, would be a better way to recognise teaching quality and encourage enhancement, while not adding to the burden of regulation on providers, causing confusion among prospective candidates and putting at risk the reputation of the sector as a whole.”* Publicly funded higher education provider

- Use of narratives or supporting statements alongside the ratings or other assessments (e.g. pass or fail).
- Suggestions that a star rating system would provide an alternative.
- The rating of specific aspects of quality as undertaken in the REF:

*“Ratings could be given for each aspect of quality rather than just a single rating, in a similar way as the REF offers multiple outcomes, allowing the complexities of teaching and learning to be better demonstrated and understood and outcomes to be more nuanced.”* Representative organisation

#### Introduction of subject-level TEF

5.115 A few respondents discussed the introduction of the subject-level TEF in response to this question. These discussions primarily focused on the potential for subject and provider ratings for a single provider to generate confusion. As such a HEI could have a gold rating at provider-level and at the same time have bronze ratings for specific subject areas:

*“Subject TEF does not result in a single rating, but multiple ratings. If the implication is that there may be different ratings for different parts of the process, that may start to become even more confusing for applicants.”*  
Other

Other comments

5.116 Other comments provided in response to this question have been included below:

- Within a HEI there are a range of both strengths and weaknesses.
- Those HEIs rated as provisional are potentially at risk if getting stuck in that rating.
- Concerns that HEIs are ‘gaming’ the ratings.

**Question 17b**

5.117 The responses to the question “Are the purposes of TEF met with three levels of differentiation, plus a fourth rating for those unable to be assessed?” are shown in Table 5.7 below:

**Table 5.7: Are the purposes of TEF met with three levels of differentiation, plus a fourth rating for those unable to be assessed? (Question 17b)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Publicly funded HE providers (n=114)	24	21%	80	70%	10	9%
Academic (n=85)	12	14%	60	71%	13	15%
Student/student bodies (n=27)	4	15%	18	67%	5	19%
FE college (n=15)	6	40%	6	40%	3	20%
Representative Organisations (n=17)	3	18%	11	65%	3	18%
Other (n=43)	19	44%	19	44%	5	12%
<b>Total (n=301)</b>	<b>68</b>	<b>23%</b>	<b>194</b>	<b>64%</b>	<b>39</b>	<b>13%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

5.118 More than half of all respondents (64%) stated ‘no’ in response to this question. This was matched for all the groups with the exception of ‘further education colleges’ and ‘others’ where equal proportions responded to the ‘yes’ and ‘no’ options (40% and 44% respectively).

5.119 A total of 175 text responses (54% of all respondents) were provided. The text responses to this question had many similarities to those provided to question 17a referring to the complexity of HE teaching, the ‘cliff edge’ issue in differentiation, alternatives and a need for simplicity.

Factors determining ratings and the difference between ratings

5.120 The main issues raised in relation to this code were:

- That a gold rating does not support efforts to improve teaching.
- That the provisional rating will be associated with being poor quality.
- With three levels of differentiation there is insufficient granularity (level of detail) for students and/or other stakeholders.
- Three levels of differentiation do not reflect the complete range of HE provision:

*“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.”* Representative organisation

The complexity of HE is not reflected

- 5.121 A fairly large proportion of respondents to this question indicated that three levels of differentiation and a fourth for those unable to be assessed is too simplistic and does not reflect the complexity of teaching excellence in HE. As such they fail to provide a complete picture of teaching quality and of the range of providers:

*“The current system provides a very simple rating following a complex assessment process. Universities are also complex institutions and teaching takes place within this context.”* Publicly funded higher education provider

The three levels of differentiation are appropriate

- 5.122 As a demonstration of the polarity of views (for this question) within the respondent group, a large proportion indicated that the three levels of differentiation was appropriate. Generally coded responses indicated that this approach was regarded as clear, simple, logical and sensible:

*“University staff members consulted during the preparation of the response generally supported the maintenance of the three levels of differentiation.”* Publicly funded higher education provider

- 5.123 Some of the responses within this coding theme made statements that the levels of differentiation were appropriate, but also set out caveats relating to concerns about marketisation of HE, unknown international impacts, and the role of differentiation in driving improvements in teaching and education:

*“We think this approach is clear and easily understood within the national context but do note that there is some concern within the sector about how the ratings play out regarding UK higher education within the global market.”* Publicly funded higher education provider

Alternatives to three levels of differentiation and unable to assess

- 5.124 Responses to this question included suggested alternatives to the rating system (similar to those suggested at 17a). These have been summarised below:

- Introduction of more levels of differentiation.
- Alternative approaches to scoring e.g. pass/fail, two rankings only, 0-10 scale or two rankings only.
- Alignment with other systems e.g. Ofsted categories or the REF.
- The introduction of a process of continuous assessment for improving teaching.
- A specific category for providers that have low number of students.

The rating system does not provide sufficient detail

- 5.125 Some respondents indicated a view that having three levels of differentiation plus a fourth for those unable to be assessed does not meet the purpose of TEF because there was insufficient detail provided. It was noted that this lack of detail meant that the communication with prospective students was ineffective and that they were provided with too little information. The categories used were considered to be too broad and a more nuanced and granulated approach was seen as more appropriate:

*“We feel that the categories are too broad, there needs to be a sub-category below bronze, to ensure that the ratings are marginally more granular to assist with student choice. A silver feels a catch-all for most providers if you fail to reach the required flags for gold, but not low enough for bronze.”* Other

The importance of simplicity

- 5.126 As stated in responses to question 17a the importance of having a simple rating system was mentioned in responses. This it is argued would make it clear for all stakeholders:

*“Simple and straightforward for students and key stakeholders.”* Publicly funded higher education provider

Other comments

- 5.127 Other comments from respondents related to concerns about the ‘cliff edges’ between the ratings, a perception that there could be a drift to the centre (i.e. silver) leading to a lack of differentiation between institutions, and where institutions remain in the same category over time, there will be no driver for change or improvement.

**Question 17c**

- 5.128 The responses to the question “Are the purposes of TEF met by ratings named gold, silver, bronze and provisional?” are shown in Table 5.8 below:

**Table 5.8: Are the purposes of TEF met by ratings named gold, silver, bronze and provisional? (Question 17c)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Publicly funded HE providers (n=114)	18	16%	84	74%	12	11%
Academic (n=85)	9	11%	61	72%	15	18%
Student/student bodies (n=26)	3	12%	18	69%	5	19%
FE college (n=16)	9	56%	7	44%	-	-
Representative Organisations (n=16)	1	6%	14	88%	1	6%
Other (n=44)	12	27%	27	61%	5	11%
<b>Total (n=301)</b>	<b>52</b>	<b>17%</b>	<b>211</b>	<b>70%</b>	<b>38</b>	<b>13%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

- 5.129 In response to this question over two thirds (70%) of respondents answered 'no'. Across all of the groups, respondents were more likely to answer 'no' to this question with the exception of FE colleges where 56% stated agreement and 44% stated 'no' to the question.
- 5.130 A total of 205 text responses (63% of all respondents) were received. As for 17b there were many similarities with the responses provided in 17a that addressed the meaning and understanding and the benefits and impacts of the gold, silver, bronze and provisional (GSBP) ratings. The key themes are discussed below.

#### The meaning and interpretation of the ratings

- 5.131 Respondents discussed how the ratings will be interpreted and what they mean. The main areas covered have been included below:
- The ratings named GSBP were not generally well understood and another rating system would be more meaningful e.g. Ofsted ratings.
  - A view that GSBP were not appropriate for teaching excellence. These generally tended to be associated with sporting events (e.g. the Olympics). As such gold HEIs were regarded as winners and bronze as losers:  
*"Institutions are not Olympic athletes. Very similar submissions get very different gradings. The system lacks nuance."* Academic
  - There were difficulties associated with the interpretation of the provisional rating which could potentially be seen as a higher rating than bronze. Or it may be a deterrent for prospective students.

#### The Bronze rating is misunderstood

- 5.132 Specific mention was made with respect to how a bronze rating will be interpreted and understood. Many respondents expressed concerns about this when presenting their views on the different ratings. The concerns expressed have been listed below:

- A bronze rating might be interpreted as: a fail, sub-standard, under-achieving, inferior, or poor-quality teaching.
- The bronze rating has the potential to cause reputational damage for a HEI and to impact negatively on student recruitment:  
*“Bronze providers were more likely to report a decline in reputation as a result of the TEF, with 25%, compared to 0% for gold-rated institutions and 3% for silver (Evaluation of Provider-Level TEF, p. 44, no. 3.57) and reported concerns that a bronze award may be viewed by applicants as an indicator of poor-quality teaching.”* Other
- Students and other stakeholders may not understand that a bronze rated institution has already met quality thresholds.
- Feedback from students suggesting that they would be ‘put off’ from applying to a bronze rated institutions.

#### Ratings inappropriate for use in Higher Education

- 5.133 Many of those responding outlined a view that the GSBP ratings were inappropriate for higher education. It was stated that if the purpose of TEF is the enhancement of teaching and learning then a much more nuanced rating system would be required:

*“The multifaceted nature of teaching excellence and student outcomes means that a unidimensional classification system misrepresents and vastly oversimplifies a complex scenario. In the event that at some point prospective students are strongly influenced by TEF, there is a real danger of this classification system leading them to disregard other richer sources of information which are more directly germane to their decision-making.”* Publicly funded higher education provider

#### Benefits of the ratings

- 5.134 While a proportion of respondents outlined many reasons for the GSBP rating not meeting the purpose of TEF, in contrast to this some stated that there were benefits associated with this system of ratings.
- 5.135 The key benefits were that GSBP ratings were well and widely understood, that they promoted improvement and that they avoided confusion. Some suggested that they should not be changed as they were still being mainstreamed and were gaining familiarity among stakeholders:

*“This is the current rating system and appears to be relatively easy for students and stakeholders to understand. It should be retained at least for TEF Year 3 to allow for consistency and comparability. Changing it prematurely might risk confusion not only in the sector, but also for students and other stakeholders.”* Publicly funded higher education provider

#### Implications for competitiveness and international reputation

5.136 A small group of respondents discussed the issue of competitiveness. Some considered that the ratings could damage the competitiveness of an institutions particularly when international comparisons are being made:

*“Part of the original logic in adopting the medal titles was to aid in the international marketing of the UK offer. It is not clear that this has been the result and what is a complex system for a UK student to grasp may be of less relevance in an international context.”* Publicly funded higher education provider

#### Other issues

5.137 Other issues raised by respondents to this question have been included below:

- The rating of provisional was misleading and seen as not being an assessment of quality.
- A gold rating may be counterproductive from some prospective students who may view such an institution as “too good” for them.
- The suggestion that further research was needed to investigate the interpretation of the ratings by the different stakeholder groups.

#### **Question 18**

5.138 Question 18 invited respondents to suggest alternatives for provider-level and subject-level TEF, a total of 199 responses (61%) were received. It also asked those respondents who reflected on the impact of TEF on the international reputation of institutions and/or the UK as a whole to provide any information or evidence to support their views.

#### **Question 18a provider-level TEF**

5.139 For provider-level TEF respondents offered a range of alternatives, some of which had already been proposed in previous answers. These were wide ranging and included assessments that did not use ratings, approaches used in other assessment systems, and additional ratings to the GSBP approach. Further details of these responses are provided in the following sections.

#### Additional ratings or assessments for TEF

5.140 Some respondents suggested that for provider-level TEF it would be useful to provide further assessment information or additional ratings for the GSBP. This included the following:

- Additional context for the TEF ratings GSBP e.g. scoring of 0-10, or a 1-5 stars rating.
- A rating below bronze.
- As part of provider-level TEF the provision of additional subject-related information relating to the provider. This would assess the performance of subject areas within the institution:

*“I think a provider-level TEF should exist. However, I think it would be good to have the provider’s subjects as additional information in the metrics included with flags - the subjects could be benchmarked against the institution itself rather than across the sector. So, when looking at X institution, you can also see that Physics and History are below the institutions core metrics and are areas that need to be addressed (and you would hope that it would be mentioned in the submission).” Other*

- Replace silver and bronze with a neutral award e.g. ‘TEF Quality Assured’.
- Add an additional ‘Fail’ rating.
- The provision of additional differentiation of the ratings e.g. silver+/bronze+.

#### Learning from other systems

5.141 In their answers, some respondents suggested that the quality assessment criteria used in other systems could be applied to provider-level TEF. A range of quality assessment systems were mentioned, however some were frequently mentioned in relation to this and other questions. The most frequent suggestions have been listed below:

- The QAA Quality Enhancement Review (Wales).
- The ratings system used for the REF.
- The Knowledge Exchange Framework (KEF) approach.
- The Athena-Swan approach that is focused on development and planning.
- The Scottish Enhancement-led Institutional Review (ELIR).
- The performance-based system that has been proposed in Australia.

#### Qualitative data only

5.142 Responses to this question included a view that narratives and qualitative data relating to the teaching would be the most useful to students and other stakeholders. This could be provided in reports and would offer comprehensive information drawing of a range of perspectives:

*“A narrative commentary would better inform an external audience of the nature of the provider and of the considered judgement of a panel on the quality of provision.”* Publicly funded higher education provider

#### The provision of information only

5.143 The view that information alone is sufficient without the need for ratings was expressed by some. This it was argued would enable the strengths and weakness of an institution to be set out and would enable students to draw conclusions for themselves:

*“The misleading gold/silver/bronze ratings should be abolished, with outcomes expressed instead as a more nuanced profile which reflects the performance against mission and true quality of each institution. Elements of the profile could include teaching quality, learning environment, and student outcomes – and potentially highlight good practice in other areas outlined in written submissions such as learning resources, research-led teaching, or innovation. This would better recognise the diversity of the sector and reflect relative strengths.”*  
Publicly funded higher education provider

#### Other suggestions

5.144 Responses to this question included some other suggestions in addition to those described above. These have been listed below:

- A view that there is no need for a competitive judgemental assessment of teaching excellence.
- Provision of a summary of relevant metrics or the data that the TEF draws on without any ratings.
- Suggestions that more granular rating systems are required with a number of sub-categories or additional details associated with the ratings.
- Awards for specific thematic areas e.g. employability, research informed teaching, or university investment.
- Support for a TEF Quality Mark – a kitemark for quality.

#### **Question 18b subject-level TEF**

5.145 Respondents were asked to suggest alternatives for subject-level TEF. Responses to this question had many similarities to those provided for provider-level TEF and included a substantial group who outlined their opposition to subject-level TEF. A total of 163 responses (50% of all respondents) were received.

#### Alternative scoring systems

5.146 A large proportion of responses outlined suggestions for other approaches to assessment and scoring. These have been included below:

- A binary rating system e.g. Approved/Not Approved or TEF Achieved/TEF Not Achieved.
- The same system as the REF (use of star ratings) or the KEF (profiling for each subject).
- Numerical scales.
- Greater differentiation for the ratings e.g. silver +/bronze\*.
- Additional information for the three ratings e.g. a 5 level rating system.
- Use of a dashboard system that incorporates information from datasets.
- Extension of UNISTATS to provide enhanced subject-level information.

- The suggestion that the rating system for subject-level TEF should be different from the system used for provider-level TEF to avoid confusion e.g. Outstanding/Very Good/Good.

#### Opposition to TEF

5.147 Although respondents were not specifically asked to outline their reasons for opposing TEF, this was a focus for some of the responses given to this question. The key reasons for opposition were:

- The view that subject-level TEF is not useful or a good idea.
- Data associated with subject-level TEF is more problematic than for provider-level TEF i.e. the validity and reliability of the proxy indicators and the smaller cohort sizes at subject-level:

*“Under the present approach we would not support the introduction of subject-level TEF. The smaller cohort sizes involved and resultant lack of statistical significance and/or missing metrics means that for most subjects it would have no value as a tool to inform student decision-making.” Publicly funded higher education provider*

- The resource implications for institutions related to preparing subject-level TEF submissions:

*“Subject-level TEF would inevitably increase the burden on institutions. Our experience in the Y3 subject-level pilot demonstrated to us that the cost of participation was significant and likely not justifiable in relation to its usefulness for students or the enhancement of provision. As mentioned above, Scotland already has a well-established process for subject-level review via the Quality Enhancement Framework.” Publicly funded higher education provider*

#### Provision of information only or qualitative data

5.148 Some of the responses given proposed that the provision of information or qualitative data would offer a better alternative to the TEF ratings. It was suggested that this would provide a greater level of detail and provide a narrative on strengths and weakness in different subject areas. This it was stated could provide course-related and outcome information and would support comparisons between programmes and providers:

*“Do away with hierarchical systems. Provide information on type of teaching (varied, flexible, student-led) or assessment context (subjective value judgements in the arts versus objective evaluation in sciences, etc.). Provide insight and description over ranking.” Academic*

#### Other comments

5.149 Some other comments not included in the above codes have been included below:

- The focus should be on institutional-level assessment (internal) where judgements are made against the institution’s own mission or goals.

- Presentation of the data sets (metrics) on which TEF is currently based.
- Concerns that subject-level TEF can cause reputational damage to UK HEIs or to specific departments within an institution.
- Subject-level TEF would be pointless for provider who only offer one course.

### Question 18c

5.150 In relation to question 18c respondents were asked to provide their views on the impact of TEF on the international reputation of institutions and/or the UK as a whole. Responses given addressed how TEF influences international students, there was discussion of reputational impacts for UK HEIs alongside discussion of barriers faced by international students and international perceptions of UK higher education. A total of 106 responses (32% of all respondents) were made for this question.

#### How TEF influences international students

5.151 For this code views centred around the following areas:

- The TEF was not well understood from an international perspective. This could be because this type of ranking is not used in other countries.
- An evidence-based view that awareness of TEF among international students was low and has not impacted on student choices:

*“The research that has been undertaken to date by Hobsons, WonkHE and others indicates that there is variation between countries in their perceptions and understanding of TEF ratings. As such, TEF has not yet been shown to have any significant impact on international students’ decision-making about whether to come to the UK to study.”* Publicly funded higher education provider

*“[Name of HEI] was ranked ‘gold’ in TEF2. We have seen no obvious impact of this rating on international recruitment.”* Publicly funded higher education provider

- Comments on the lack of comparability of ratings of teaching quality internationally (TEF was significantly dissimilar to systems used in other countries), which can lead to misinterpretation:

*“We have not previously commented on the possible impact of TEF on international reputation, but we are concerned about the potential for poorly understood ‘medals’ to inappropriately influence international students’ decisions and funding. A bronze award may well be construed as indicating low-grade provision, albeit that this is not the intention of TEF, and deter potential candidates from applying.”* Publicly funded higher education provider

- A concern that the message that TEF gives to international students and stakeholders is that:

*“...many of our universities are not as good as they should be.”* Academic

- A view that the data associated with TEF reflects UK resident students rather than international students:

*“While anecdotal evidence suggests that the TEF has some profile among international applicants, ironically it has little to say about their outcomes or learning environment. Of the core metrics used for the TEF, the metrics for continuation, employment and high skilled employment are calibrated to use data only for UK domiciled students.”* Publicly funded higher education provider

#### The reputation of UK HEIs

- 5.152 There were many comments on the impact of the TEF on the international reputation of UK HEIs, both negative and positive (although the proportion of negative response was greater) as follows:

##### *Negative:*

- Feedback that international colleagues have a negative view of the TEF with implications for reputation:

*“Anecdotal evidence from discussion with American colleagues suggests that the TEF is part of an excessively and bureaucratic and ratings-driven approach to student outcomes that puts off many working in the UK and tarnishes our reputation.”* Academic

- The competitive nature of the TEF served to undermine the reputation of UK HEIs.

##### *Positive:*

- The view that UK based HEIs have a good reputation internationally and that TEF has not had an impact on that:

*“In conversations with academics abroad, UK universities continue to enjoy a high reputation. This has nothing whatsoever to do with the existence of TEF. If anything TEF is seen as a negative.”* Academic

- The view that as TEF drives up standards of teaching excellence it enhances the reputation of UK HEIs:

*“The process however does enhance the reputation of institutions by driving up teaching excellence and sending a message that teaching and research should be viewed on a par.”* Academic

*“From an international perspective, it is too early to tell whether TEF has made a tangible difference in terms of international reputation. However, evidence suggests that more international students are looking to TEF awards as an indication of institutional prestige.”* Publicly funded higher education provider

#### Perceptions of bronze ratings

- 5.153 Specific mention was made in relation to the bronze rating and the international reputation of UK HEIs. These included:

- The potential risk to the international reputation of bronze rated institutions which may be seen as not meeting quality standards.
- Misinterpretation of a bronze rating could potentially damage international reputation – this could give mixed messages to students.

*“HotCourses<sup>16</sup> measured a deterrent effect among international students against bronze institutions.” Representative organisation*

#### International approaches to the assessment of teaching quality

- 5.154 A small number of respondents discussed approaches used in other countries to assess teaching quality. This included cultural aspects or named countries that did not rate teaching quality – thereby casting doubt on the international value of the TEF.

#### TEF and perceptions from non-UK HEIs

- 5.155 The perceptions of colleagues from other countries were included in responses to this question. These were a perception that the UK government does not understand higher education, that the UK has taken a negative direction, and that the GSBP rating has the potential to communicate the wrong message (i.e. that not all UK HEIs offer high quality provision).

#### Barriers for international students

- 5.156 Responses did include some discussion of potential barriers to international students accessing UK HEIs. These were: the impact of the UK leaving the EU, the demoralised status of teaching staff in higher education, and the high fees charged alongside a perception of reduced quality.

#### **Email responses**

With regards to the TEF ratings, many of the email respondents raised the same issues as those responding via the online consultation. However, some additional responses were provided that offer further feedback on the ratings. These have been included below:

- With reference to the gold rating there was discussion regarding how comparable this is between two institutions when university missions, teaching approaches and student demographics are so variable:

*“Benchmarking is used because TEF realises not all universities have the same mission or teach the same kind of materials and it is an attempt to control for differences in demographics. Statistically, TEF gold at one institution can not necessarily be compared with TEF gold awarded to another. This is potentially deceptive and misleading for stakeholders, particularly students.”*

- Due to the perceived ambiguity of the TEF rating, there should always be signposting to other sources of information:

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<sup>16</sup> A website that facilitates searching of HE courses

*“TEF awards should not be relied upon absolutely and should instead be used to complement other sources of information. There is therefore a need to ensure that TEF is presented in a way that links to and complements the wider student information landscape.” Representative organisation*

- Rather than a single rating one respondent suggested using a profile approach that could teaching quality, learning environment, and student outcomes.
- Another alternative suggested was the use of “value added KPIs” for students:

*“Ultimately the true measure of TEF achievement should be demonstrable through value-added KPIs that directly show how the student’s financial investment in their learning has raised their attainment in their employment journey.” Other*

### Section Five: Has TEF changed anything?

5.157 This section focussed on the impact of TEF on the ability of higher education providers to carry out their functions relating to the student experience and in terms of research and knowledge transfer.

#### Question 19

5.158 Question 19 focussed on the positive changes to the educational experience of students (e.g. on teaching and learning) that had resulted from the introduction of TEF. Respondents were asked if positive changes had occurred, and if so, what those changes were. Question 20 below asked the converse of this question – if educational experience had been negatively impacted.

5.159 The responses given to the question “Has the introduction of TEF positively changed the educational experience of students (e.g. teaching and learning)?” are shown by each respondent group in Table 5.9 below:

**Table 5.9: Has the introduction of TEF positively changed the educational experience of students (e.g. teaching and learning)? (Question 19)\***

Respondent group	Yes		No		Don’t know	
	Number	Percent	Number	Percent	Number	Percent
Publicly funded HE providers (n=122)	56	46%	38	31%	28	23%
Academic (n=86)	6	7%	68	79%	12	14%
Student/student bodies (n=28)	7	25%	13	46%	8	29%
FE college (n=17)	5	29%	7	41%	5	29%
Representative Organisations (n=17)	7	41%	5	29%	5	29%
Other (n=42)	12	29%	15	36%	15	36%
<b>Total (n=307)</b>	<b>93</b>	<b>30%</b>	<b>146</b>	<b>48%</b>	<b>73</b>	<b>23%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

5.160 Just over half (48%) of responses answered ‘no’ – i.e. TEF has not positively changed the experience of students. This feeling was particularly strong amongst academics (79%), but less so amongst publicly funded HE providers (31%) and representative organisations (29%).

5.161 196 responses were received to the qualitative question – 60% of all consultation respondents.

No impact

5.162 Respondents noted that TEF had neither positively nor negatively impacted the educational experience of students and had not had any impact on teaching and learning. Respondents noted that:

- Emphasis has always been on providing the best educational experience and this focus has not changed as a result of TEF.
- Providers have not made significant changes to their policies and priorities as a result of TEF.
- Changes would have been made in relation to provider’s own existing analysis of the metrics (e.g. NSS results).
- There are challenges in linking improvements in educational experience to TEF, especially due to the changing higher education landscape.

*“There was already an extremely keen focus on teaching quality within our provision.”* Further education college

*“No ‘special effort’ has been made in regard to TEF in terms of enhancement of learning and teaching out with of the delivery of strategies and approaches that were already underway, both institutionally and collaboratively.”* Publicly funded higher education provider

Too early to say

5.163 Whilst some respondents noted the potential positive impacts of TEF on the educational experience of students, they considered it too early to say whether any positive impacts have occurred to date. Respondents also noted the need to wait for the implications of subject-level TEF to be seen before making a judgement on the impacts.

5.164 Some respondents did note positive impacts on educational experience as a result of TEF. These are detailed below.

Greater focus on improving teaching quality

5.165 The most commonly mentioned positive impact of TEF on educational experience was the greater focus that had been placed on improving teaching quality by institutions. Key positives included:

- **Metrics and data:** respondents noted analysis of the TEF metrics had provided new information and insights into the institution and highlighted areas for improvement.

- **Widening participation:** analysis of the split metrics was also felt to have been helpful in identifying groups of students who were performing better/worse than others and in identifying where additional support could be needed. It had also increased the importance placed on good performance across all student groups.

*“The TEF has been important in promoting equality and diversity in our teaching and learning. In particular the use of systematic split metrics have provided an important reference point in ensuring that excellence and outcomes work for all groups of students.”*

- **Benchmarking and competitiveness:** benchmarking against other providers was felt to ensure that providers strive to keep their teaching provision competitive.

*“The use of benchmarked data has enabled us to more fairly and clearly ascertain our own position and performance in the sector relative to other institutions, and this has definitely been an aid to strategic planning.”*

Publicly funded higher education provider

- **Resources and funding for teaching:** TEF was felt to have resulted in greater strategic focus on teaching quality, which had resulted in greater resources and funding being allocated to teaching.
- **Teaching staff:** teaching staff were felt to be able to concentrate on teaching and be valued for doing so. This was felt to have resulted in less stressed and more committed teaching staff who are more engaged with students.

*“Teaching is taken more seriously. We have staff for instance on teaching only contracts who concentrate on teaching and this has had positive impacts. They have a clear path to promotion and no longer have to pretend to do research or become stressed because they cannot do so and are treated as second class colleagues as a result.”* Academic

- **Relationship with research:** respondents noted that providers were giving parity of esteem to teaching and research (as has historically not been the case) – including in relation to staffing, resourcing and strategic focus.

*“It has encouraged institutions to consider teaching just as important as research.”* Academic

- **Subject-level TEF:** respondents noted that the pilots of subject-level TEF had ensured focus on teaching quality across all subject areas, including those in which the provider had not traditionally been as focussed on.

*“We know of no evidence that it has, however, for some institutions, it has ensured that there is a focus on quality teaching at subject-level and has created a drive to ensure greater consistency across subjects.”* Other

#### Student engagement

5.166 Respondents noted that student engagement in making decisions about their teaching and learning was happening to a greater extent as a result of TEF. This was felt to be leading to more collaborative working, resulting in an improved educational experience. It was also noted that the requirement for partnership working with students in the second subject-level TEF pilot is a welcome development.

*“Possibly ‘student engagement’ has come to mean that students can get more involved and have more of a voice.” Academic*

*“The TEF encourages universities to enhance their dialogue with students over teaching provision and have a focus on student outcomes.” Publicly funded higher education provider*

5.167 Other respondents noted that the importance placed on the NSS within TEF had led to greater focus on engaging with students and responding to their issues. TEF was also felt to have led to providers increasing opportunities for students to give their feedback throughout their course, with the hope of resolving problems before students complete the NSS.

*“The emphasis upon the NSS metrics within TEF ensures that the student voice is considered and responded to by institutions on matters relating to undergraduates’ educational experiences.” Publicly funded higher education provider*

## Question 20

5.168 The responses given to the question “Has the introduction of TEF impacted negatively on the educational experience of students (e.g. teaching and learning)?” are shown by each respondent group in Table 5.10 below:

**Table 5.10: Has the introduction of TEF negatively changed the educational experience of students (e.g. teaching and learning)? (Question 20)\***

Respondent group	Yes		No		Don’t know	
	Number	Percent	Number	Percent	Number	Percent
Publicly funded HE providers (n=120)	32	27%	52	43%	36	30%
Academic (n=85)	54	64%	12	14%	19	22%
Student/student bodies (n=28)	14	50%	9	32%	5	18%
FE college (n=17)	-	-	12	71%	5	29%
Representative Organisations (n=17)	10	59%	2	12%	5	29%
Other (n=42)	12	29%	12	29%	18	43%
<b>Total (n=309)</b>	<b>122</b>	<b>39%</b>	<b>99</b>	<b>32%</b>	<b>88</b>	<b>28%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

5.169 There was a mixed picture amongst the respondents to this question – with similar numbers of respondents answering ‘no’ (32%) and ‘don’t know’ (28%), with only slightly more answering ‘yes’ (39%). There were also large variations between the respondent groups:

- Publicly funded HE providers were most likely to answer ‘no’ (43%).
- Whilst academics (64%), representatives organisations (59%) and student/student bodies (50%) were most likely to answer ‘yes’.
- None of the FE college respondents answered ‘yes’, whilst 71% answered ‘no’.
- Those from the other group were most likely to answer ‘don’t know’.

5.170 As noted above in question 19, a number of respondents<sup>17</sup> noted that it was too early to determine the impact of TEF (either positively or negatively) or that there has been no impact on educational experience as a result of the introduction of TEF.

5.171 The negative impacts respondents noted are discussed below.

#### Time and resource allocation

5.172 The most commonly mentioned negative impact was the reduced staff time and resource for teaching as a result of the need to satisfy the requirements of TEF. This, it was felt, has resulted in a poorer quality experience for students.

*“It has diverted staff time from developing high quality teaching to dealing with the administrative burden of a meaningless rating system.”*

Publicly funded higher education provider

#### Impacts on the curriculum

5.173 Respondents highlighted negative impacts on the curriculum resulting from the introduction of TEF. These included:

- Reduced innovation within teaching, as providers ‘play it safe’ to reduce risk of lower their TEF rating. Respondents indicated the potential risk of a move towards more standardised teaching methods.

*“The focus has shifted to being less innovative and experimental in learning and teaching to keep it all safe to fit in with metrics.”*

- Potential risk of reduced variety of subject provision, if providers decided not to run courses with a poor subject-level TEF rating.

*“There is also the risk of closure of subjects that, despite being popular or of value, result in low TEF scores.”* Representative organisation

- Reduced academic quality of the curriculum, as providers aimed to improve attainment, continuation and satisfaction with the course.

*“University managements are inclined to provide more and more product-like courses and qualification to student-customers, hence undermining the academic quality of the content.”* Academic

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<sup>17</sup> 203 text responses were received to this question, representing 62% of all respondents.

- Providers making alterations to the curriculum not for the benefit for the students but in order to improve their TEF rating.

*“Increasingly, teaching is being adapted to the question of “what will get us the best scores in the TEF metrics” and NOT on the basis of good educational theory or pedagogy -- and in fact, quite often in the reverse, that is, good pedagogy will be thrown out the window in favour of activities that will increase TEF scores. This directly leads to a worsening of teaching quality and provision.” Academic*

#### Students as consumers

5.174 Linked to the above, respondents noted that as a result of TEF there was a greater focus on student satisfaction and seeing students as consumers who *“need to be kept happy”*. This was leading to a negative impact on education experience, for the following reasons:

- The provision of teaching was being altered (e.g. more lecturers and tutorials) in order to keep students happy, which was reducing the self-learning experience that was felt to be valuable for students and meaning courses were less academically rigorous.
- Students were reported to have less motivation to work hard, believing that good grades were inevitable.
- There was the potential incentive for providers to increase grades in order to increase student satisfaction.

*“It has added to the sense that university is a transaction purchased by consumers.”*

*“The continuing approach of treating students like consumers is having a damaging impact on their engagement, work ethic, and ability to actually enjoy higher education. They expect an absolute outcome now--both from us and themselves--and it's resulting in worse work and lower levels of engagement.” Academic*

#### Student engagement

5.175 Some respondents noted that students were being asked to complete more surveys and questionnaires to gather their opinion, which could be time-consuming and frustrating for students.

*“They are constantly asked to fill in surveys, which they hate with a passion. We ask ours to fill in loads of questionnaires about teaching and they won't do it because they are fed up with being asked so often.” Academic*

- 5.176 Issues were also raised in relation to the use of NSS and the resulting increased non-engagement with the survey. It was felt that this has impacted some providers greatly, reducing the information they have on student perspectives and impacted on their position within league tables. The link between NSS, TEF and increased fees was also felt to have caused some deterioration in the relationship between the student bodies and senior managers.

*“We believe the link between NSS and TEF is problematic, as it has led students to use the NSS as a means to protest about broader sector issues, e.g. marketization of HE. This leads to questions about the validity of the NSS data.”* Publicly funded higher education provider

#### Impact on student recruitment

- 5.177 A small number of respondents noted that TEF had the potential to lead to providers recruiting students who help maximise their TEF rating – i.e. those who are likely to gain high-earning employment after graduation. Although not yet occurring, it was felt that this could potentially impact negatively on social mobility and the widening participation agenda within higher education.

*“There is no direct evidence of this at this stage, however the risk is there that the TEF and the metrics used lead institutions to avoid recruitment of students from disadvantaged backgrounds or with complex characteristics in order to maximise their performance.”* Representative organisation

#### Impact on teaching staff

- 5.178 Respondents noted negative impacts on teaching staff, which in turn can lead to negative impacts on students. Negative impacts on teaching staff included:
- Additional stress due to the workload associated with TEF.
  - Reduced morale, as teaching staff could feel that a ‘poor’ rating can lead to additional pressure and criticism from senior managers within their organisation.
  - Increased focus on teaching and student satisfaction had led to staff having reduced time for research activity.

#### **Question 21**

- 5.179 Question 21 and 22 focus on the impact of TEF on research and knowledge transfer. Respondents were asked if the impact had been positive (question 21) or negative (question 22) and, if so, what has been the impact. Response rates to these questions reflected some of the lowest across the call for views – 114 (35%) for question 21 and 166 (51%) for question 22 – reflecting not only the view that TEF was having a limited impact on these but also difficulties with defining knowledge transfer.
- 5.180 The responses given to the question “Has the introduction of TEF impacted positively on research and/or knowledge transfer?” are shown by each respondent group in Table 5.11 below:

**Table 5.11: Has the introduction of TEF impacted positively on research and/or knowledge transfer? (Question 21)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Publicly funded HE providers (n=119)	18	15%	70	59%	31	26%
Academic (n=86)	3	3%	69	80%	14	16%
Student/student bodies (n=27)	-	-	10	37%	17	63%
FE college (n=16)	2	13%	5	31%	9	56%
Representative Organisations (n=15)	-	-	3	20%	12	80%
Other (n=42)	4	10%	15	36%	23	55%
<b>Total (n=305)</b>	<b>27</b>	<b>9%</b>	<b>172</b>	<b>56%</b>	<b>106</b>	<b>35%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

5.181 Just over half (56%) of responses stated 'no' in response to this question, indicating that they do not feel that there has been a positive impact on research and knowledge transfer. However, there were a large number of responses giving the answer 'don't know' and as discussed above lots of respondents did not provide an answer to the qualitative question.

#### No impact

5.182 Some respondents<sup>18</sup> noted that there has been no impact on research and knowledge transfer as a result of TEF (41 references). Comments were made in relation to there being no direct link between TEF and research and knowledge transfer, given that the focus of TEF is on teaching and the REF measures provider's research activity.

*"This is very unlikely, and not what the TEF was designed to do."* Other

#### Too early to say

5.183 Whilst some respondents felt that there was the potential for TEF to impact positively on research and knowledge transfer, they noted that it was too early to identify any impact and more time was needed before any positive impact would be seen.

*"It is too early to tell what impact TEF has had. Given that most institutions have only had a single rating and that the data-lag makes the timeframe for change very slow it will take time for the impact to be understood."* Publicly funded higher education provider

#### Positive impacts of TEF on research and knowledge transfer

5.184 As noted above, there was not a strong feeling that TEF had positively impacted on research and knowledge transfer. For those respondents who did indicate positives, these included:

<sup>18</sup> 105 text responses were provided for this question (32% of the total respondents)

- Raised profile of research-led and informed teaching.  
*“Potentially raising awareness of the importance of research informed/led/oriented teaching and learning, stronger embedding of research activities into the curriculum, the importance of student-led research and opportunities for dissemination of student research (including students as knowledge exchange agents).”* Further education college
- Greater integration of research and teaching, including greater focus on how the two elements can work together and benefit each other. This includes incorporating research into the curriculum.  
*“TEF also supports the University’s existing efforts in integrating research into our curriculum, research-informed teaching and providing undergraduate students with better opportunities to engage in research.”* Publicly funded higher education provider
- Raised the significant of pedagogically-related research activity.  
*“It has definitely improved focus on research led teaching and gives an opportunity to highlight the impact of research upon teaching, and particularly in showcasing the opportunities for student collaboration and student driven research.”* Publicly funded higher education provider
- Increased opportunities for sharing of knowledge and learning across the higher education sector in relation to teaching good practice.
- Increased opportunities for CPD for staff related to teaching, which was felt to have expanded their skills and knowledge.

### Question 22

5.185 The responses given to the question “Has the introduction of TEF impacted negatively on research and/or knowledge transfer?” are shown by each respondent group in Table 5.12 below:

**Table 5.12: Has the introduction of TEF impacted negatively on research and/or knowledge transfer? (Question 22)\***

Respondent group	Yes		No		Don’t know	
	Number	Percent	Number	Percent	Number	Percent
Publicly funded HE providers (n=117)	24	21%	61	52%	32	27%
Academic (n=85)	59	69%	9	11%	17	20%
Student/student bodies (n=27)	2	7%	5	19%	20	74%
FE college (n=17)	-	-	9	53%	8	47%
Representative Organisations (n=18)	7	39%	2	11%	9	50%
Other (n=43)	5	12%	12	28%	26	60%
<b>Total (n=307)</b>	<b>97</b>	<b>32%</b>	<b>98</b>	<b>32%</b>	<b>112</b>	<b>36%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

- 5.186 Across all respondent groups, responses were most likely (36%) to state that they 'don't know' whether the introduction of TEF has impacted negatively on research and knowledge transfer. This compares to equal numbers of responses who stated either 'yes' or 'no' (32%).
- 5.187 There was some variation in responses between respondent groups:
- Just over half (52%) of publicly funded HE providers stated that TEF has not negatively impacted on research and knowledge transfer, whilst 69% of academics felt that it had.
  - Students/student bodies (74%) and other groups (60%) were most likely to answer 'don't know' and had a greater proportion of respondents giving this as their answer.
- 5.188 As noted above in question 21, respondents<sup>19</sup> noted that it was too early to determine the impact of TEF (either positively or negatively) or it was not likely that any impact had occurred. The respondents that did note negative impacts are discussed below.

#### Impact on time/resource allocation

- 5.189 By far the most commonly mentioned negative in relation to the impact of TEF on research and knowledge transfer was the diversion of time and resources to the requirements of TEF (including data analysis and writing the written submission), resulting in less time available for research and sharing of knowledge.

*"Time and energy has been diverted from conducting excellent research and knowledge transfer to collecting evidence and ticking boxes."*  
Academic

*"Research time is lost due to increased workload to prepare for a meaningless ranking."* Academic

#### Impact on research

- 5.190 Fewer respondents noted that a greater focus on teaching (due to the TEF) had resulted in resources being diverted away from research and knowledge transfer into teaching. This had resulted in:
- More staff time being dedicated to teaching – for example delivering more lectures – in an attempt to improve TEF rating.
  - Greater segregation of teaching and research as staff increasingly see them as two areas with competing priorities.

*"Teaching and research now seen as in competition with one another, rather than as an integrated part of academic experience."* Other

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<sup>19</sup> 150 text responses were provided for this question (46% of all respondents)

*“Internal resources for research have been diminished, to give space to teaching improvement (i.e. new courses) and put research active academics in a stressful position of competition for external funding.”*  
Academic

5.191 Some respondents noted the impacts these changes were having on higher education staff, including:

- Increased stress, particularly in relation to higher teaching workloads.
- Increased anxiety over the need to apply for external research funding due to more limited resources.
- Decreased morale due to the changing nature of higher education priorities.

#### Impact on knowledge transfer

5.192 Only one negative impact on knowledge transfer was noted in relation to TEF. This was in relation to greater competition between providers leading to less sharing of knowledge and good practice. Some respondents noted that providers would be less willing to share knowledge and information, as teaching within higher education is seen as a more competitive environment than before the introduction of TEF.

*“There may be less incentive for the dissemination of good practice between institutions (because institutions are in competition with each other because of the way the TEF metrics are devised).”* Academic

#### **Email responses**

Email responses were more likely to say that there had been negative impacts on HEIs as a result of the introduction of TEF, including on the educational experience of students. Over half of all respondents also stated that it was too early to make a judgement on the likely impacts of TEF.

Negative outcomes included:

- Providers aiming to recruit different types of students (e.g. those more likely to help improve TEF ratings).
- Increased burden on staff and resources as a result of the need to comply with the requirements of TEF, including the written submission.
- Potential damages to the reputation of HE internationally.

*“There is a significant risk that TEF outcomes could damage the reputation of UK HE overseas and so affect international student recruitment. This could threaten the financial sustainability of a number of strategically important courses, which may then have knock-on effects for domestic students and the UK economy more broadly.”*

Positive outcomes included:

- Greater strategic focus on teaching, particularly in relation to parity of focus with research activity.

- More resources and funding for teaching.
- Greater recognition and value for teaching staff.

*“We welcome the overarching aim to raise esteem for teaching alongside that already established for research. We would also say that this is already having a positive impact. Education is clearly higher on institutional and sector agendas than previously.”*

### Section Six: Is TEF worth it?

5.193 This section of the consultation explored the costs and benefits of provider-level and subject-level TEF. In addition to asking about how TEF helps the different stakeholders this section asked for views on the most significant costs and benefits of TEF.

#### Question 23

5.194 Respondents were asked “Does TEF help you as a student/student union/provider/employer/other?” The responses given to this question are shown in Table 5.13 below:

**Table 5.13: Does TEF help you as a student/student union/provider/employer/ other? (Question 23)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Publicly funded HE providers (n=117)	58	50%	44	38%	15	13%
Academic (n=84)	7	8%	66	79%	11	13%
Student/student bodies (n=26)	8	31%	15	58%	3	12%
FE college (n=17)	9	53%	4	24%	4	24%
Representative Organisations (n=15)	5	33%	5	33%	5	33%
Other (n=43)	15	35%	17	40%	11	26%
<b>Total (n=302)</b>	<b>102</b>	<b>34%</b>	<b>151</b>	<b>50%</b>	<b>49</b>	<b>16%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

5.195 For all responses to this question, half indicated that the TEF did not help them. With regards to groupings ‘FE colleges’ and ‘publicly funded HE providers’ were slightly more likely to answer positively to this question (53% and 50% respectively). Students/student bodies and academics had the highest proportion of responses that TEF did not help (with 58% of students/student bodies and 79% of academics answering ‘no’ to this question).

5.196 Explanations for the answers given to this question (text responses) ranged from outlining reasons why TEF does not help, the resource implications of TEF, the impact of TEF on HEIs and teaching, to comments about student choice and the ratings. Each will be discussed further below. A total of 266 text responses (82% of all respondents) were received for this question.

TEF does not help

5.197 Respondents offered a range of reasons why they considered that TEF does not help them as a student/student union/provider/employer/other. The main reasons emerging from responses have been included below:

- TEF takes time away from other activities e.g. teaching and research.
- A perception that TEF was not relevant to students (as other factors may determine their choice of provider).
- It has contributed to a more bureaucratic culture and a greater administrative burden for HEIs:

*“As noted elsewhere, the TEF has introduced an additional administrative burden for the provider as a whole and for those leading in learning and teaching in particular.”* Publicly funded higher education provider

- Improvement in teaching quality was already in place and a key aim for HEIs before the introduction of TEF:

*“In the HEIs I have experience of working in, teaching learning is already taken extremely seriously, and has high esteem, and is the focus of continuous efforts aimed at improvement. TEF does not usefully add to this, in my view.”* Academic

- It does not help due to concerns about the validity of the metrics which were seen to undermine its credibility.

*“The TEF promises to reduce “teaching excellence” down to a simple rating for an institution or for a subject, but since that rating is based on criteria that have nothing to do with teaching, it is an illusory measure of quality that misleads students, employers and the public.”* Academic

- TEF it was suggested was linked to high levels of stress and anxiety among staff and students.
- TEF was too heavily weighted towards employment outcomes at the expense of teaching excellence.
- TEF does not help due to the lack of evidence that TEF information was used to inform student choices, or that it was well understood.
- As TEF was seen to not capture the complexity of teaching in HE it was seen to not help.

Resource implications

5.198 The demands on resources were outlined by a large group of respondents. This included the following:

- The time taken to prepare the TEF submissions.
- Time taken for TEF constituted a diversion of limited resources away from other activities:

*“There is a huge amount of resource that goes into producing the submission and its subsequent assessment by external panels. The cost of this enormous exercise is directing student fees away from its intended aim of enhancing teaching quality and excellence.”* Publicly funded higher education provider

- Some noted that TEF had added to the workload of HEI staff.
- It was felt to increase levels of bureaucracy in HEIs.
- The costs were seen to outweigh the benefits.

#### The impact of TEF on teaching and HEIs

5.199 The impact of the TEF on teaching and HEIs was discussed by some respondents. This included comments about both positive and negative impacts that TEF was perceived to have generated. The main areas covered have been included below:

##### *Negative impacts:*

- TEF contributes to increased competition between HEIs and the ‘marketisation’ of the sector – this was viewed by some as damaging.
- As a result of TEF, HEIs are led to focus on gaining better teaching assessment rather than on improving teaching quality.
- As a result of TEF, HEIs focused on training people for highly paid employment.
- Without the correct metrics TEF cannot bring positive benefits for HEIs.
- The focus on metrics was seen to stifle creativity.
- To have a positive impact it needs to incentivise teaching enhancement.

##### *Positive impacts:*

- TEF helps HEIs to market themselves and it demonstrates a commitment to teaching quality:

*“TEF has been useful as an external endorsement of our institution’s teaching and learning. We have also used it to explain to students how we measure our own success in delivering high quality teaching and learning – what metrics and measures we use. It has certainly improved the quality of the discussion about student outcomes e.g. employability.”* Publicly funded higher education provider

- TEF provides HEIs with a focus for development or investment and to identify areas for change.
- TEF can help institutions to learn from each other e.g. sharing best practice.
- It ensures that there is a focus on excellent teaching and places a higher value on HE teaching:

*“The TEF helps the provider focus on enhancing excellent teaching and raising the value of teaching across the sector. It has additionally created opportunities for us as a provider to work more closely with the Union on education matters and for us to focus on the student voice and student engagement.”* Publicly funded higher education provider

- TEF has contributed to an equalisation between research and teaching.
- It has offered opportunities to improve the overall student experience.
- The benchmark data has helped to assess performance and contributed to strategic planning:

*“The use of benchmarked data has enabled us to more fairly and clearly ascertain our own position and performance in the sector relative to other institutions, and this has definitely been an aid to strategic planning.”* Publicly funded higher education providers

- The TEF has helped to raise the profile of teaching and engaged staff in development of teaching.

#### TEF and student choices

- 5.200 Some respondents discussed how TEF had impacted on student choice, with some noting a view that it had not had any impact. Examples were provided of TEF information being used to inform student choices and to enhance understanding of teaching excellence were offered:

*“Yes it has helped me explain what teaching excellence means to potential students, students, staff, other stakeholders including employers. An applied metricised concept which is submission informed, with a rating outcome, is easier to explain, and understand, than a pure concept.”*

Other

*“It gives an indication of the quality of provision and encourages a culture of continuous improvement and sharing of good practice across the sector. As a student those things are important to me.”* Student/student body

- 5.201 Some respondents mentioned that student choices were based on a wide range of factors, only one of which is TEF. Others stated a view that the TEF was poorly understood by students and that levels of awareness were low:

*“Data published by [the Universities and Colleges Admissions Service] UCAS indicates that student awareness of TEF remains very low, so it is unlikely that the scheme is helping students during the application process.”* Publicly funded higher education provider

#### Measurement of HE performance

- 5.202 There were some comments on the impact of TEF on performance within HEIs. The TEF process had been used to drive improvements in performance in HEIs and had encouraged them to reflect on good practice, innovate their teaching practice and to identify strengths and weaknesses:

*“Yes. The process of the exercise is helpful as a provider especially with regards to performance relative to benchmark and the split metrics”.*  
Publicly funded higher education provider

#### Interpretation of TEF ratings

5.203 The impact of TEF ratings on providers was discussed. A gold rating although a sign of excellence was seen to stifle change and innovation (in case this high rating was lost as a result). Others has seen few benefits from a gold rating and it was unclear to them if this had played a part in student choices. Other comments related to a view that the provisional rating was unclear and that the bronze rating was open to misinterpretation.

#### Other issues

5.204 Other issues raised in responses to this question have been included below:

- The TEF had helped by enhancing the reputation of HEIs.
- The TEF had raised the profile of teaching intensive providers.
- A view that it was too soon to judge if TEF has helped.
- The TEF had led to greater employer engagement and/or awareness of employer needs.
- With inclusion of the student voice the TEF had the potential to create a better balance and partnership between student unions and their HEI.

#### **Question 24**

##### **Question 24a provider-level TEF**

5.205 This question asked respondents for further details regarding the most significant costs of **provider-level TEF**.

5.206 Responses to this question focused on the level of demand and the range of resources associated with provider-level TEF. These included the high demands on HEI resources, details of actual costs, the unintended consequences of provider-level TEF, the administrative burden for HEIs, and wider sector implications. A total of 242 responses (74% of all respondents) were received.

#### Demands on HEI resources

5.207 With regards to resource demands there was a large number of references. They focused on the time taken to prepare written submissions for TEF and the concern that preparing for TEF takes staff away from other activities:

*“As I've already indicated, the danger is that the TEF is diverting attention from important processes. Time and effort may be being diverted from educating our students to getting a good TEF result. Hopefully, TEF will develop processes that will achieve both. But I don't think it's there yet!”*  
Academic

5.208 The workload was seen to be high for both provider and subject-level TEF. One respondent indicated 350 hours of staff time at an approximate cost of £25,000. The resource burden was particularly centred around administrative staff.

Actual costs associated with provider-level TEF

5.209 In addition to the actual financial implications of TEF for HEIs, other costs identified by respondents included: investments in IT, the disproportionate costs for smaller providers, reputational costs associated with TEF ratings, costs associated with communicating TEF information or ratings and the costs of preparing written submissions and the metrics.

Unintended consequences

5.210 Costs associated with the unintended consequences of TEF were mentioned by some respondents to this question. These have been included below:

- The opportunity costs of TEF which could result in less focus on research and innovation.
- Staff wellbeing costs related to anxiety and stress associated with TEF and the TEF process.
- TEF could disadvantage some groups, lead to grade inflation or to the loss of course – all with associated costs.
- Costs associated with higher levels of monitoring and surveillance.
- The disproportionate costs faced by smaller and more specialist providers (in relation to both skills for participating in TEF and staff time).
- The potential for bronze rated providers to be financially penalised because of this rating.

The administrative burden

5.211 Specific reference to administration of the provider-level TEF was made by some respondents. These comments specifically related to the time and costs of providing administration staff to prepare the TEF submission, stay up-to-date with developments in TEF, review the metrics and in policy development (associated with the TEF process). This was seen to be a demand on both senior staff and administrative teams e.g. Business Managers.

Wider implications for the HE sector

5.212 Coded references outlined costs associated with the wider impacts of TEF on the sector as listed below:

- Costs associated with damage to the HE culture arising from TEF.
- Costs associated with the perceived ‘devaluing’ of degrees.
- Gaming of the metrics and associated costs.
- The potential for reputational damage to HEIs.

- In the context of a culture of significant cost cutting across the sector, TEF represents a financial burden.
- Costs associated with the provider-level TEF are outweighed by the benefits for HEIs:

*“We believe the costs associated with our provider-level assessment in 2017 were outweighed by the benefits of participation...”* Publicly funded higher education provider

#### **Question 24b subject-level TEF**

- 5.213 This question asked about the most significant costs for **subject-level TEF**. Many of the issues raised in terms of resources and financial costs were the same as those given for provider-level TEF. A total of 218 responses (67% of all respondents) were submitted.

#### No benefits from subject level TEF

- 5.214 Although not the focus of this questions a sub group of respondents outlined the view that they could not identify any benefits from subject level TEF. The costs were seen to be high and in excess of those associated with associated with provider-level TEF:

*“The significant amount of resource required to respond to the TEF, and the associated opportunity costs, represent the biggest issue at provider-level TEF, and we would expect this to be amplified if subject-level TEF is introduced.”* Publicly funded higher education provider

- 5.215 The higher costs associated with subject-level TEF were seen to be due to the following:

- Additional layers of work required e.g. for the preparation of multiple narrative submissions.
- Additional duties for staff and involvement of subject related staff (e.g. department heads):

*“It is worth noting that our experience of the subject-level pilot showed that the subject-level assessment took more time to prepare (60 pages for the total pilot, consisting of nine subject-level submissions and one provider-level submission, compared to 15 pages for the TEF 2 provider submission). The demand on departmental staff was greater, as they had to dedicate time to input into and review their subject submissions.”* Publicly funded higher education provider

- Collation of the data for analysis of multiple subjects.

#### Resource and administration implications

- 5.216 The specific costs associated with subject-level TEF were outlined by a large proportion of those responding to this question. There was consensus that this would be greater than for provider-level TEF:

- A greater administrative burden than for provider-level TEF in particular for the larger HEIs:  
*“We believe that subject-level TEF, as envisaged through adoption of something akin to the first pilot’s Model A, will be extremely burdensome, and should be dropped. While the [name of university], with the benefit of having piloted both initial models, does not believe that a Model B-style grouping of subjects is feasible, desirable or likely to be more efficient, it should not be ignored that for a large, multi-faculty university in particular, regular assessment of all subjects will pose a significant administrative burden.”* Publicly funded higher education provider
- The financial burden was regarded as greater for HEIs with higher number of subjects:  
*“[The most significant costs are] administration and management of TEF activity across 27 subject areas, with no economies of scale between subjects of significantly different student numbers.”* Publicly funded higher education provider
- The costs of preparing for the subject-level TEF submission for 22 subjects were estimated by one respondent to be in the region of £150,000.
- Very high sector-wide costs were outlined for subject-level TEF:  
*“...[a representative body] estimates that costs could be as high as £37.6 million across the sector (£246,000 per provider – considerably higher than the expected OfS registration fee for a large provider)...”* Publicly funded higher education provider
- Concerns about costs associated with the roll-out of subject-level TEF nationally, specifically if this is undertaken too rapidly:  
*“We urge the Government to ensure that the OfS is fully resourced and prepared before subject-TEF is fully rolled out. The burden of the pilot was increased by a delay in the release of data, errors in data, and incorrect or hard to follow guidance.”* Publicly funded higher education provider

#### Unintended consequences

- 5.217 Many of those responding noted that they anticipated some unintended consequences arising from the subject-level TEF. These were varied but the most frequently mentioned have been included below:
- A risk of unintended consequences where subjects that are less popular or have smaller cohorts could be closed down.
  - The potential for some subjects to be discriminated against because they do not result in well paid employment opportunities (e.g. theology).
  - Concerns about a lack of integration between research and teaching as a consequence of subject-level TEF.
  - Concerns about the complexity of subject-level TEF and of duplication of activity for the provider-level TEF:
-

*“Subject-level assessment will be unwieldy, complex, and expensive, and it will not be able to produce reliable judgements – particularly not judgements that are comparable across providers nationally. The negative effects on teaching and learning, as with the negligible nature of the impact on student decision-making, will only be exacerbated with a subject-level TEF. The process as it currently stands duplicates much of the provider-level process with elements of the student experience being reassessed through the subject-level assessment.”* Student/student body

- The additional staff time for preparing subject-level TEF diverted staff resources from other activities:

*“At subject-level, where subject staff are involved in producing subject submissions a disproportionately high amount of staff time is required to brief them regarding the metrics and the intricacies of engagement with TEF when the majority of academic staff time needs allocating elsewhere.”* Publicly funded higher education provider

- Challenges associated with ensuring that staff are available and provision of resources for subject-level TEF. Longer timescales were proposed and alignment with the time for the REF.
- Smaller providers generate less data in relation to subject-level TEF which has significant cost implications for them:

*“As a small, College-Based HE provider (c.550 students) subject-level TEF is going to provide us with significant challenges, as we do not generate sufficient data at subject-level through the NSS and DLHE to be able to full participate.”* Publicly funded higher education provider

#### Variations in subject delivery and definition

- 5.218 Although not always with direct reference to costs, some respondents outlined views relating to the definition and delivery of the subject-level TEF. This included discussion of the potential for a misalignment between departmental structures in HEIs and the subject groupings. Similarly, it was noted that the subject coding may be too broad to capture the diverse range of courses within it (e.g. art and design).
- 5.219 For subjects/courses with smaller cohorts (within smaller or alternative providers) concerns were expressed about the scope for gaining meaningful data at subject-level. Others, outlined a view that low performing subjects/courses could be put at risk of closure as a result of subject-level TEF:

*“The feeling in relation to subject-level TEF is similar, but with the added cost that low performing programmes could be unjustifiably closed in response to low TEF ratings which may be reflective of small groups of students struggling with certain aspects of the programmes rather than actual overall quality.”* Representative organisation

### Other views

- 5.220 Some respondents outlined positive views about the associated costs. This included a recognition that the benefits of subject-level TEF outweigh the costs (even though these are higher than provider-level TEF):

*“Again, staff time is the most significant cost, but the information generated is very valuable in ensuring reflection, improvement and maximisation of impact on learners.”* Publicly funded higher education provider

### **Question 25**

- 5.221 This question asked respondents to outline the most significant benefits of both provider-level and subject level TEF. Each will be reported in turn.

### **Question 25a provider-level TEF**

- 5.222 This question related to the views on the benefits of provider-level TEF. A total of 229 consultation responses (70% of all respondents) were provided.

### Greater value placed on teaching and enhancement

- 5.223 A key benefit identified by a large volume of the respondents was that provider-level TEF ensures that there is a focus on teaching and/or enhancement in higher education. Issues raised within this area include the following:

- Particularly for the smaller providers it evidences the quality of the teaching that they provide thereby demonstrating their contribution to higher education:

*“It has provided evidence that small, College-Based HE providers are able to provide quality HE teaching and positive outcomes for their students. It has also given confidence to students that chose this route for whatever reasons, personal, academic or professional, that their learning experience and final qualification is of value.”* Publicly funded higher education provider

- Teaching was taken more seriously as a result of provider-level TEF and it provides an opportunity to celebrate teaching excellence, brings benefits for students, highlights good practice, and provides a tool for enhancement.
- Acknowledgement that teaching is one of the primary purposes of universities.
- It evidences the work, support or investment that providers have put into teaching and learning activities.
- The TEF exercise demonstrates that the higher education sector is committed to providing good teaching to students and it serves to enhance provision by raising the profile of teaching across the sector.
- The TEF recognises and celebrates those HEIs which have enhanced social mobility and it provide a focus on student outcomes.

- TEF information and benchmarking generates institution level data and evidence of performance which in turn promoted the enhancement of quality:  
*“The information and benchmarking provides institutions with useful evidence and data about performance that supports quality enhancement.”* Representative organisation
- Provider-level TEF can support development of strategy within HEIs:  
*“Provider-level TEF can enable a strategic outlook on teaching within university administration and can reflect on how university strategic policy decisions impact on ground-level teaching.”* Representative organisation  
*“... our institutional strategies have aligned with TEF to sharpen our corporate focus, heighten awareness of our continued monitoring and enhancement process, and increase staff engagement.”* Publicly funded higher education provider
- The TEF rating has the potential to promote staff morale and to attract staff to an institution:  
*“Anecdotally, the TEF gold rating has had an impact in how staff perceive their roles and their sense of self-worth. There is some evidence that the TEF rating and TEF submission has been used by staff applying to the University.”* Publicly funded higher education provider  
*“There is a sense of pride amongst staff resulting from the explicit statement of the strength of teaching both across the university and within subjects.”* Publicly funded higher education provider

No benefits identified

5.224 A large volume of the responses outlined the view that no benefits of provider-level TEF could be identified. The main reasons for this perception have been listed below:

- Over-riding concerns about the impact of competition and marketisation on the HE sector.
- It creates unnecessary management jobs.
- The benefits of the provider-level TEF are for the government rather than for higher education.
- A view that there are no benefits because students are not aware of TEF or do not use the TEF information or due to concerns about the process and/metrics used.
- The model used by the TEF is rejected (preferences included the REF approach).
- The information generated by the TEF was not meaningful.

#### Provision of information for students

- 5.225 A group of responses to this question outlined a view that the most significant benefits of provider-level TEF related to the information that it generates for both students and employers. This informs student choice in relation to quality at a given HEI and for comparing different providers.
- 5.226 The TEF information it was suggested serves to highlight to students that a provider is serious about teaching, learning and student outcomes. In addition, it supports student decision-making in relation to future employment prospects post-graduation.
- 5.227 With regards to the data, the TEF information provided a broader view as it had been drawn from multiple data sources and as it was benchmarked, it provided enhanced information for student decisions.

#### Relationship between research and teaching in HE

- 5.228 Some responses mentioned the relationship between research and teaching and the benefits of provider-level TEF in impacting on this. Areas discussed included the following:
- Provider-level TEF has redressed the imbalance between teaching and research in higher education.
  - Non-research focussed providers have an opportunity to demonstrate their areas of excellence.
  - The student focus has been raised as a result of recognising excellent teaching outside the research arena.

#### Comparisons between providers

- 5.229 For this code the view that provider-level TEF has a role in informing comparison between HE providers was discussed. It was seen to offer additional information for students considering multiple institutions, with the benchmarks adding an additional level of information:

*“Provider-level TEF provides an opportunity to take a holistic review across the whole institution. It provides a way of comparing the university’s provision in the context of their benchmarks, whereas the league tables do not benchmark in such a comprehensive way.”* Publicly funded higher education provider

- 5.230 Being able to make comparisons offers an opportunity for HEIs to differentiate themselves from each other and this could also support international recruitment. For smaller providers it offers an opportunity for recognition across the HE sector. Furthermore, it was seen to contribute to greater levels of accountability and transparency.
- 5.231 For one Russell Group university, the provider-level TEF was seen as helpful in demonstrating excellent teaching within a research-intensive environment, helping to raise their profile among multiple providers:

*“We also received the reputational benefit of being one of only eight Russell Group institutions to have been awarded gold in the 2017 exercise, which we believe recognises our longstanding commitment to high-quality education in a research-intensive environment.”* Publicly funded higher education provider

#### Other issues

5.232 Additional comments not coded under the previous headings have been listed below:

- It facilitates discussion and consideration of what constitutes excellence in teaching.
- It raises the international profile of UK HEIs.
- It provides an official source of information.
- It promotes the enhanced use of data in planning, policy design and internal reviews.

#### **Question 25b Subject-level TEF**

5.233 Respondents were asked to identify the most significant benefits of subject-level TEF. A total of 203 responses (62% of all respondents) were received. The results have shown that many of the benefits identified were the same or very similar to those outlined for provider-level TEF.

#### Between subject comparisons

5.234 Many of the responses discussed the benefits of subject-level TEF in supporting comparisons between HE subject areas. This it was suggested would enhance the level of information available to prospective students.

*“We recognise that the more granular information provided by subject-level TEF might be of more value to end users and that a subject-level TEF necessarily increases internal focus on, and engagement with, teaching enhancement across all subjects.”* Publicly funded higher education provider

5.235 Comparisons between subject areas would serve to support innovation and development and improve standards overall. In addition, this would be of benefit to employers who would be informed about differences in delivery and outcomes for specific subject areas.

#### Additional measures of quality

5.236 The additional benefits of subject-level TEF (when compared to provider-level TEF) were discussed. These focused on the depth and detail offered by subject-level depth and the more refined information it could potentially provide. The areas discussed have been included below:

- It offers a fairer assessment of teaching quality because of the within subject context.

- Subject-level TEF means that it is much harder for HEIs to hide poor performing courses.
- The information generated draws out both the strengths and weaknesses of the provider.
- Greater level of scrutiny can “*shine a spotlight*” on the value and importance of teaching excellence.
- It offers additional data sets that can be used to improve teaching quality.
- The additional information promotes better engagement of teaching staff, reflection and review:

*“The TEF is a useful incentivisation framework for academic units and professional services to think carefully about the quality of their work in delivering excellent learning and teaching, an excellent learning environment, and strong student outcomes.”* Publicly funded higher education provider

#### HEIs can target improvements

- 5.237 For some respondents the most significant benefit was associated with the enhanced level of information provided by subject-level TEF, that can better inform improvements. As every subject is reviewed and evaluated it can more effectively inform teaching practice by offering deeper insights:

*“The most significant benefits of subject-level TEF are the initiatives and enhancements that subject areas put into place to improve the level of teaching quality and the overall student experience. The requirement to analyse the available data (both the metrics and the institutional data) means that every subject is undertaking a review of their area, improving the culture of using data more effectively to make better, evidenced-based decisions.”* Publicly funded higher education provider

#### More informed decision-making

- 5.238 Responses included under this code made reference to the subject-level TEF information being more meaningful for prospective students than provider-level TEF information. It was stated that the information will better enable students to match themselves to a specific course and will provide an opportunity for good departments within an institution to showcase their teaching excellence and to market themselves to students and employers:

*“Subject-level TEF will be more informative to a potential student than provider-level TEF, particularly for very specific or vocational courses, as it allows the student a more focused view of the teaching quality, they would actually be receiving within a given provider. In this way it also provides recognition for excellence in individual teaching departments, even within institutions with a lower overall TEF rating.”* Representative organisation

### No benefits

5.239 A large proportion of the responses included reference to or statements that there were no benefits from subject-level TEF. The reasons provided for this view have been included below:

- Some stated that it is too soon to see any benefits.
- A concern that it will cause confusion for prospective students.
- The view that there are other sources of subject-level information already available.
- Some felt that the costs of subject-level TEF were too high to justify it.
- There are no benefits due to concerns around the methodology being used and problems associated with measurement:

*“...we share the view expressed by [Universities UK] UUK and the Russell Group that in its current form, Subject-level TEF does not carry value as an exercise and should not be taken forward. The flawed methodology and limits to scalability risk creating an exercise which misleads rather than informs students and does not serve institutions for the purposes of quality enhancement.”* Publicly funded higher education provider

- The view that there will be no benefits because of the number of degrees within a single subject area (e.g. specifically in relation to the creative arts and art and design). As such subject-level TEF would not be meaningful.

### **Email responses**

#### **Is TEF worth it?**

The role of TEF in raising the profile of and engagement with teaching and learning was stated in responses, alongside the view that there were low levels of awareness among students. Evidence was outlined in relation to staff costs associated with TEF:

*“UUK has estimated that HEIs spent £4.1 million on staff costs to participate in the TEF2 provider-level exercise, and it is unclear to what extent this has had a positive effect on enhancement of teaching quality within institutions. A survey conducted by UUK found that the TEF has only influenced around 20% of responding institutions to review and revise existing learning and teaching enhancement activities, whilst much of the additional investment in this area had been planned before the TEF was introduced.”* Representative organisation

With regards to the subject-level TEF evidence outlined indicated even higher costs for HEIs:

*“Following a provider cost survey, DfE estimates the cost of the subject-level TEF model currently being piloted to be at least £24 million if applied to all UK providers, however this seems likely to be a significant under-estimate and indeed a recent analysis by UUK has estimated the cost to total £37.6 million.”* Representative organisation.

*For HEIs any further funding cuts would it was argued could impact negatively in the financial stability of institutions:*

*“Any reduction in funding for teaching as a result of the Post-18 Review, coupled with the implications of Brexit and other financial challenges could undermine the financial sustainability of many universities and will make it even harder to deliver additional burdensome regulatory requirements.”  
 Representative organisation*

*The resource burden would be magnified it was stated if both the REF and subject-level TEF were operating within the same timeframes. In contrast to this one respondent considered that costs associated with subject-level TEF should not be onerous as it was argued they should be part of internal quality assurance and review processes.*

For Scottish universities it was stated that there could be a ‘double burden’ and potential confusion to have both QEF and TEF assessments and ratings.

### Section Seven: Is TEF fair?

5.240 This section asked respondents to consider whether the overall TEF process delivers effectively for all types of student, provision and providers across the HE sector.

#### Question 26

5.241 Question 26 and 27 asked respondents whether there are particularly types of students, provision or providers are disadvantaged (question 26) or advantaged (question 27) in a disproportionate way by the current design of TEF. Respondents were asked to outline ways these disadvantages/advantages could be addressed.

5.242 The responses given to the question “Are there particular types of student, provision or providers that are disadvantaged by the current design of TEF in a disproportionate way?” are shown by each respondent group in Table 5.14 below:

**Table 5.14: Are there particular types of student, provision or providers that are disadvantaged by the current design of TEF in a disproportionate way? (Question 26)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Publicly funded HE providers (n=120)	101	84%	6	5%	13	11%
Academic (n=82)	44	54%	3	4%	35	43%
Student/student bodies (n=24)	20	83%	1	4%	3	13%
FE college (n=17)	15	88%	1	6%	1	6%
Representative Organisations (n=16)	14	88%	-	-	2	13%
Other (n=45)	36	80%	2	4%	7	16%
<b>Total (n=304)</b>	<b>230</b>	<b>76%</b>	<b>13</b>	<b>4%</b>	<b>61</b>	<b>20%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

- 5.243 Across all respondent groups, the majority of respondents answered ‘yes’ in relation to whether particular types of student, provision and providers were disproportionately disadvantaged by the design of TEF. The feeling was strong across all respondent groups, though academics were more likely to answer ‘don’t know’ compared with other groups.
- 5.244 The qualitative responses<sup>20</sup> mainly gave examples of groups they believe to be disadvantaged, though 157 references outlined how this could be remedied. The main disadvantages were linked to the use of employment and earnings data and the NSS results.

#### Disadvantages due to student characteristics

- 5.245 Respondents noted that providers with a diverse intake of students, particularly those from widening participation groups, were likely to be disadvantaged by the current design of TEF. The student groups identified, and the reasons respondents gave for the disadvantages to providers, were:
- **International students:** this student group were not included within the employment statistics and were less likely to complete the NSS.  
*“Providers with high numbers of international students, EU students or very mobile UK students are disadvantaged by the metrics for graduate outcomes, in particular the LEO outcome.”* Publicly funded higher education provider
  - **Student groups who are statistically less likely to gain employment or high paid employment:** for example, those from Black, Asian and Minority Ethnic (BAME) backgrounds, carers, disabled students and those from lower socioeconomic backgrounds. Providers with higher levels of students from these groups were likely to be disadvantaged within the employment and earnings data.  
*“A graduate’s family and socio-economic background, their gender, ethnicity and prior attainment are also factors which can significantly affect earnings.”* Publicly funded higher education provider
  - **Commuter and local students:** providers with a high proportion of students from the local area or who commute from the local area – notably FE colleges – were felt to be disadvantaged by the lack of regional benchmarking of the employment data.  
*“The evidence shows that providers who have a commuter students base, widening participation entrants and/or students coming from areas of high socio-economic deprivation are less likely to perform well on TEF metrics and therefore are also likely to be rated less highly in TEF.”* Publicly funded higher education provider

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<sup>20</sup> 244 text responses were received to this question, representing 75% of the respondent population.

- **Mature students:** the design of TEF did not take into consideration the reasons for students studying higher education. Respondents noted that it assumes that it was to gain employment or earn a higher salary, when many mature students study out of interest or for personal development reasons.

Disadvantages due to subject and structure of provision

5.246 Respondents noted the disadvantages faced in relation to the subject areas taught. Key reasons for disadvantages were felt to be:

- Subjects that do not lead to highly paid jobs (either immediately after graduation or in the longer term) were felt to be disadvantaged by the emphasis on employment and earnings data. This was particularly mentioned in relation to courses in the arts and some health and social care courses. It was felt that although these jobs are valuable to society, the social value of these courses is not captured within either LEO or the DLHE data.
- Concerns were also raised in relation to the categorisation of ‘highly skilled’ graduates within the DLHE data.
- Within subject-level TEF, it was felt that providers with a large number of inter-disciplinary programmes are disadvantaged. Respondents stated that the process of grouping subjects within subject-level TEF did not take into account students studying multiple subjects.

5.247 In terms of structure of delivering provision, the following disadvantages were identified within the respondents:

- Providers delivering apprenticeships (higher/degree) and foundation degrees were not felt to be reflected within the TEF process, particularly in terms of these students not being able to complete the NSS. This was also the case with post-graduate provision.
- Providers delivering courses via distance learning and part-time were also felt to be disadvantaged by use of the NSS metrics – the questions were not felt to reflect the diversity of experiences within higher education (e.g. lack of a physical campus).

*“Distance learners studying part-time on undergraduate programmes are not appropriately represented in the data sets.”* Publicly funded higher education provider

Disadvantages due to size of provider

5.248 Two main disadvantages were raised in relation to the size of providers. Firstly, smaller providers were felt to be disadvantaged by having more limited funding and staff resource to devote to TEF. Smaller providers are less likely to have a dedicated staff team to complete the requirements of TEF, compared with better-resourced providers.

*“Many of our members have limited resource to support and engage effectively with TEF, including the preparation of the submission, compared with large multi-faculty institutions. It is often left to one person who works on many areas to deal with.”* Other

*“Smaller institutions are disadvantaged as it takes the same amount of time to prepare a submission in any institution and so as a percentage of staff time available it is a higher burden. This for example is a major problem for theological colleges engaged in ministerial formation.”* Other

5.249 The second main disadvantage noted in relation to the size of the provider was the issue of smaller cohort sizes within the data analysis. The main issues were:

- Inability to generate statistical significance, especially within the split metrics;
- Metrics being unreportable due to insufficient data.
- Large impact within the metrics that changes in a small number of students can generate.
- Inability of courses with less than 30 students to get higher than a silver initial hypothesis.

*“They [smaller providers] are further disadvantaged because of data validity issues as their smaller student numbers will expose greater variances in the data.”* Other

*“TEF disadvantages providers with smaller cohort sizes, as the judgements are being made on less representative sample sizes, which are vulnerable to greater variation.”* Representative organisation

5.250 As a result of problems with the data, it was felt that smaller providers rely more heavily on the written submission, whilst only having the same page limit as the larger providers.

#### Disadvantages due to geographical location

5.251 Due to the lack of regional benchmarking of the LEO data, a large number of respondents noted that providers located outside of London and the South East were disadvantaged due to weaker employment markets and lower wages. Providers were penalised by the metrics due to their location and the local labour market – factors which were outside of their control.

*“The use of salary data (LEO) without regard to location of employment penalises institutions not in the South East of England and universities where graduates opt to stay in the local region greatly benefitting the local economy.”* Publicly funded higher education provider

5.252 A small number of providers noted disadvantages amongst providers outside of England (i.e. in Scotland, Wales and Northern Ireland). For providers in Scotland, TEF was noted to be a particular burden due to the existence of other methods of measuring teaching quality (e.g. ELIR). Similar issues to those discussed above in relation to lower graduate earnings were also mentioned.

*“Providers in Scotland, Wales and Northern Ireland risk being viewed unfavourably by potential students who develop negative views on account of them not having participated in TEF.”* Representative organisation

#### Other disadvantages

- 5.253 Respondents noted that there was the potential for all students to be disadvantaged by the current design of TEF, due to **lack of understanding** about the process of TEF and how to interpret the ratings. The current design was felt to be confusing and too difficult for students to easily digest and make informed choices from.
- 5.254 There was also felt to be a **lack of transparency** within current TEF processes, making it difficult for providers to explain the process to prospective students. These issues were also raised by a small number of respondents in relation to the use of TEF ratings by employers.
- 5.255 Some respondents noted the potential disadvantages linked to **bias in the NSS**. Research was highlighted that suggests that those from BAME groups and female lecturers were likely to be most disadvantaged.

*“The use of NSS data is problematic, given the way in which race, gender and class can impact on teaching assessments.”* Academic

#### Suggestions for addressing current disadvantages

- 5.256 The call for views asked respondents what changes could be made to address the current disadvantages. Respondents largely reiterated suggestions made earlier in their responses (and covered previously in this report), including:
- Removal, or lower weighting, of employment and earnings outcomes from the TEF assessment process.
  - Review weighting given to the NSS. The majority of respondents advocated for a lower weighting.
  - Inclusion of a distance-travelled and learning gain metric.
  - Greater benchmarking of current data – in particular geographical benchmarking of LEO data.
  - Review the current criteria and metrics to ensure the design of TEF recognises the diversity of the sector and supports widening participation.
- 5.257 A number of specific suggestions were made in relation to the need to take into account the size of providers. These were:
- Review processes for smaller providers and single subject providers – this included some suggestion that a separate TEF for these providers might be beneficial.
  - Consider increasing the minimum number of students needed on courses for subjects to be included within subject-level TEF.

- Need to provide greater clarity and support for smaller providers in terms of writing the submission.

*“My feeling is that there should be parallel assessment processes for different sizes of institutions so that, for example, colleges are judged against each other and not against large universities.” Academic*

### Question 27

5.258 The responses given to the question “Are there particular types of student, provision or providers that are advantaged by the current design of TEF in a disproportionate way?” are shown by each respondent group in Table 5.15 below:

**Table 5.15: Are there particular types of student, provision or providers that are advantaged by the current design of TEF in a disproportionate way? (Question 27)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Publicly funded HE providers (n=113)	77	68%	16	14%	20	18%
Academic (n=79)	34	43%	4	5%	41	52%
Student/student bodies (n=22)	14	64%	1	5%	7	32%
FE college (n=15)	9	60%	2	13%	4	27%
Representative Organisations (n=13)	10	77%	-	-	3	23%
Other (n=39)	18	46%	4	10%	17	44%
<b>Total (n=281)</b>	<b>162</b>	<b>58%</b>	<b>27</b>	<b>10%</b>	<b>92</b>	<b>33%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

5.259 Over half (58%) of all respondents felt that particular types of student, provision or provider are disproportionately advantaged by the current design of TEF. This view was particularly high amongst publicly funded HE providers (68%) and less strong amongst academics (43%) and the other category (46%). There were large proportions of respondents that answered ‘don’t know’ in relation to this question – 52% of academics for example.

5.260 Groups who were felt to be advantaged often reflected the opposite of those discussed in question 26 above – in fact some responses<sup>21</sup> stated this as their answer. With this in mind, a summary of the groups mentioned in response to question 27 has been noted below with a brief explanation of why they are felt to be advantaged:

- Providers with **high levels of resource and funding**, as they can dedicate more time and effort to TEF in particular the writing of the submission.
- Providers with a **greater proportion of students who are likely to find gaining well-paid employment easy** – for example students from high socioeconomic groups.

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<sup>21</sup> 171 text responses were received for question 27 (52% of all respondents)

- Providers delivering **‘traditional’ three-year, full-time degrees** in academically focussed courses. Again, this was felt to be linked to the employment and earnings metrics, but also typically higher scores within the NSS.
- For the same reasons as above, providers with **high numbers of UK students**;
- Providers located in **areas with a strong labour market and high wages**.
- **Large providers** due to benefits associated with the analysis of data (e.g. greater statistical significance).

5.261 There were also similar suggestions made in relation to changes that could be made to address these advantages – see question 26 above.

### Email responses

The responses submitted by email concurred many of the views discussed above. The majority of comments were in relation to the disadvantages posed by the current design of TEF, including:

- Smaller providers and FE colleges having less funding and resource to dedicate to TEF and the burden TEF can place upon them;
- Having large proportions of part-time and mature students was seen to disadvantage providers;
- Factors outside of the control of providers, particularly their geographical location and the impact this could have on their performance in employment and earnings data.

*“Small, specialist providers lack the infrastructure to manage the TEF submission process. Particularly issues relate to data analysis, evidence-gathering and narrative-writing, which draw away senior staff from the enhancement work they are leading.”*

*“Part-time and mature students are currently disadvantaged by the current TEF design.”*

## 6 CONCLUSIONS

### Who are you?

- 6.1 In total, 326 responses were received to the online call for views. Just under a third of these were from publicly funded HE providers and just over a quarter were from academics. Much smaller proportions were received from the remaining four respondent groups. Just over half of responses received were submitted on behalf of an organisation. Just over half of respondents had been involved in preparing for or writing a TEF or subject-level TEF submission. Much lower proportions had been a TEF assessor or panel member. The vast majority of responses were received from those in England.
- 6.2 In addition to the responses received via the online consultation, 14 responses were submitted to DfE – most of these were from representative bodies, though a small number of providers and individuals gave their views via email.

### Why have TEF?

- 6.3 There were high levels of support for assessing the quality of teaching excellence and student outcomes with many sharing a view that it would help to re-balance research and teaching activities in higher education, and provide a specific focus on enhancement and engagement with both teaching and learning. Although support for this aim was high, there was less support for TEF as the means to achieve this.
- 6.4 With regards to the purposes of TEF, ‘enhancing provision’ was regarded as more important than ‘providing information’. The role of TEF in driving improvement across the sector was a key theme, although there was some polarisation of views in relation to this. On the one hand respondents confirmed that enhancing provision was important, but that this would not be achieved through TEF, and on the other respondents stated that this would be a key outcome of the TEF.
- 6.5 While provision of information to promote student choice was supported, many felt that this was not achieved through the TEF. This was primarily due to a view that TEF information was not understood or misinterpreted, particularly within the context of many other sources of HE information being available.

### How well does TEF work?

- 6.6 There was a mixed response to the appropriateness of the current TEF criteria. The majority of criticism related to the Student Outcomes and Learning Gain aspects, particularly the use of employment and earning outcomes as a measure of teaching excellence. Factors outside of quality of teaching (e.g. social, cultural and geographical factors) were felt to have a greater influence over employment and earnings outcomes. A large proportion of respondents felt that use of this criteria should be reconsidered.

- 6.7 Across all respondent groups there was opposition to the current metrics used within TEF, with respondents noting that they were not the best proxies for measuring the TEF criteria. One of the most commonly mentioned problems with the current proxies was that they were not felt to be actually measuring teaching quality – instead they were considered to be a more accurate measure of student outcomes (e.g. employment destinations). There were also many criticisms made in relation to the data sets used as current proxies – particularly the use of LEO and the NSS results. General criticisms were also made in relation to the current weighting and balance between the different metrics, which was felt at present to be unbalanced.
- 6.8 The majority of respondents agreed with benchmarking, stating its importance in supporting the widening participation agenda and enabling reliable comparisons across providers. Respondents raised problems with the current benchmarking process, including the need for a more transparent process and the need to benchmark around a greater number of factors.
- 6.9 There was a clear view that there was a need for both quantitative and qualitative information within the TEF assessment process. Though there appears to be support for a more equal weighting in favour of the qualitative evidence – the qualitative data it was felt should be considered, alongside the quantitative data during the initial hypothesis. It was also felt that there should be greater transparency around the balance between qualitative and quantitative evidence.

### **Are the ratings right?**

- 6.10 With the exception of further education colleges, a majority of respondents did not feel that the purposes of TEF were met through a single rating. Key concerns were that a single rating would not capture the complexity or diversity of the sector and had the potential to mislead. While there was some support for the simplicity that a single rating provides, others felt that the bronze award would be mis-interpreted, (as a rating of negative or poorer performance) and alternative approaches were proposed.
- 6.11 Having three ratings, and a provisional one, was seen to not meet the purposes of TEF by more than half of respondents, primarily because these provided insufficient detail for students, employers or others. Those in support of this approach contended that they conveyed a straightforward and non-confusing message.

### **Has TEF changed anything?**

- 6.12 Some respondents felt that it was too early to discern whether an impact (either positive or negative) on the educational experience of students or on research and/or knowledge transfer had occurred as a result of the introduction of TEF. Other respondents felt that TEF was unlikely to have any impact, as HEIs were already focussed on teaching quality.

6.13 Two main positives were noted: in relation to greater focus on improving teaching quality, and increasing opportunities for students to be more engaged in making decisions about their learning and learning. Respondents were clearer around the negatives, including time and resources being diverted to completing the requirements of TEF at the expense of teaching. It was also felt that there is the potential for reduced innovation and academic quality within the curriculum. There was felt to be very little impact to date on research and knowledge transfer.

### **Is TEF worth it?**

6.14 Views on 'Is TEF worth it?' were mixed. Those with a negative view cited resource demands, concerns about the greater 'marketisation' of the sector, and the validity of the metrics used. Others emphasised the role of the TEF in demonstrating their commitment to excellence and teaching quality, its contribution to improving performance, and the potential reputational benefits for HEIs.

6.15 The costs associated with subject-level TEF were viewed to be much greater than for provider-level TEF, with specific concerns for smaller providers and those with many subjects. The administrative burden and the impact on staff time were major costs. Although some respondents were unable to identify significant benefits arising from the TEF, others highlighted the positives associated with the greater focus on teaching and enhancement, the improved balance between research and teaching, and opportunities for comparisons between providers.

### **Is TEF fair?**

6.16 Respondents felt that the design of TEF disproportionately disadvantaged particular types of students, provision or providers. Providers with a diverse intake of students, particularly those from widening participation groups; providers who deliver courses in subjects that, whilst socially valuable, do not lead to high-earning jobs; and those in geographical areas with weaker employment markets and lower wages in particular. These disadvantages were felt to be strongly linked to the use of employment and earnings data, as well as the NSS results within the core metrics.

6.17 A further disadvantage noted by respondents was the size of the provider and/or the amount of resource they have to dedicate to their HE provision. Two specific disadvantages were raised in relation to fewer members of staff and less funding to dedicate to TEF, including the writing of the submission. Smaller cohorts of data were also felt to disadvantage smaller providers, due to issues around the inability to generate statistical significance from the data and some of the core metrics being unreportable.

## APPENDIX 1: WORD COUNTS FOR QUESTIONS

Section (total words)	Question number	Word count
Why have TEF? (75,640)	10	25,377
	11b	37,767
	12	12,496
How well does TEF work? (155,990)	13	34,059
	14b	52,961
	15b	25,164
	16a	22,648
	16b	21,158
Are the ratings right? (63,300)	17a	15,401
	17b	9,821
	17c	12,856
	18a	10,546
	18b	7,070
	18c	7,606
Has TEF changed anything? (39,123)	19	14,416
	20	14,081
	21	4,095
	22	6,531
Is TEF worth it? (57,909)	23	17,413
	24a	11,648
	24b	13,295
	25a	8,198

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<b>Section (total words)</b>	<b>Question number</b>	<b>Word count</b>
	25b	7,344
Is TEF fair? (37,644)	26	27,873
	27	9,771

## APPENDIX 2: CODING FRAMEWORK

### Section Two: Why Have TEF?

**Table A.1: Question 10: Do you support the aim of assessing the quality of teaching excellence and student outcomes across providers of education? Please explain why.**

Number of references	Theme	Definition
77	Values and benefits of assessing teaching quality.	Responses that discuss the benefits of focusing on specific aspects of HE and/or on student outcomes. The value to students and to the sector from having this specific focus (from TEF).
71	TEF metrics	Comments that address the value, meaning or utility of the metrics and results that are part of TEF.
44	Support for the principle of assessment but not for TEF	Respondents who state that they support the monitoring of teaching quality in HE but who do not support the current TEF process. Reasons for this are provided.
43	Positive impacts	Responses that discuss the positive impacts of TEF that have been observed in their institution(s). Changes observed since TEF was introduced.
40	Student choices and information	Provision of information to support students' choices regarding HEIs and to contribute to their decision-making for higher education study.
34	Suggestions for improvement	Comments that outline ideas or suggestions for how they consider that TEF (subject/provider) could be improved.
11	Opposition to assessment and/or TEF	Comments that outline the reasons why they oppose the assessment of teaching quality in HE. Comments that outline reasons why the respondent is opposed to TEF.
8	Alternatives to TEF	Responses that outline approaches to the assessment of teaching quality. These are proposed as an alternative approach to that offered by TEF.
40	Other	Additional comments

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**Table A.2: Question 11b: These purposes fall into two main areas: providing information and enhancing the provision of higher education. Please outline the reasons for your answer.**

Number of references	Theme	Definition
173	Informed student choices	The need for students to have information about teaching quality and the role of TEF in making informed choices (subject and provider)
125	Relevance of TEF information	Comments on the relevance of the information that TEF provides for students and on subject versus provider level TEF
96	TEF and teaching quality	Comments about the metrics used for TEF and their relevance in determining teaching quality. Comments on the value of teaching in HE
71	TEF Metrics	Comments on the data used for measuring teaching quality and the utility of the metrics
64	Impact of TEF on HEIs or academia	How the introduction of TEF has impacted on HEIs (positive and negative responses)
111	Other	Additional comments

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**Table A.3: Should there be any other purpose for TEF?**

<b>Number of references</b>	<b>Theme</b>	<b>Definition</b>
<b>129</b>	No other purpose for TEF	Respondents who have stated 'no' to this question.
<b>40</b>	Teaching standards and excellence	Responses that refer to the role of TEF in standardising teaching or in raising standards. Creating wider teaching contexts and addressing broader issues for teaching excellence e.g. diversity.
<b>27</b>	Opposition to TEF	Responses that outline reasons why there should not be a TEF and/or that there is no need for the TEF in HEI
<b>22</b>	The organisation and structure of HEIs	Comments that refer to the HE structures for undertaking TEF and/or policies and governance issues
<b>19</b>	The boundaries and limits of TEF	Comments on the limitations of TEF and wider contextual issues or impacts of the framework

### Section Three: How well does TEF work?

**Table A.4: Are the criteria used in TEF (see Figure 1 for a list of the criteria) appropriate?**

Number of references	Theme	Definition
199	Criteria are not appropriate	Criteria used for the TEF is not appropriate. Respondents may have included comments around the metrics only providing a snapshot of information, and lack of data available to measure the criteria. Comments may also mention the challenges faced in trying to measure teaching quality.
183	Suggestions for more appropriate criteria	Any suggestions respondents note for more appropriate or additional criteria for TEF.
143	Challenges in relation to Student Outcomes and Learning Gain (SO) criteria	Specific criticisms or challenges relating to employment and earnings as criteria.
122	Criteria is appropriate	Respondents may have noted that all or some of the criteria currently used are appropriate
75	Other criticisms in relation to the criteria	Respondent made comments in relation to the Learning Environment Criteria. More general comments in relation to the criteria could also have been made.
64	Challenges in relation to Teaching Quality (TQ) criteria	Specific criticisms or challenges relating to the NSS, including data collection and results.
59	Comments relating to metrics	Any comments relating to the metrics used within TEF, including links with the criteria.
12	Other	Additional comments

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**Table A.5: Q14b: 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”.**

**Total number of responses = 284**

Number of references	Theme	Definition
230	Suggestions for alternative measures of teaching excellence	Respondent makes suggestions about possible measures that should be included in addition to current proxies, or are more appropriate than those currently used. This may include noting the importance of observing teaching as a measure of teaching quality.
158	Not measuring teaching excellence	Respondent notes that the current proxies do not measure teaching excellence. Comments may note that they more closely measure teaching quality or student outcomes.
122	Other problems with the current proxies	Respondent highlights other (general) problems with the current proxies used to measure teaching quality.
116	Criticisms of proxies for measuring Student Outcomes and Learning Gain (SO)	Criticisms and challenges in relation to the collection and use of employment destinations and earnings data to measure teaching quality. Comments may also relate to the use of LEO and DLHE data.
106	Criticisms of the proxies for measuring Teaching Quality (TQ)	Criticisms and challenges in relation to the collection and use of student feedback to measure teaching quality. Comments may also make explicit reference to the NSS.
99	Valid proxies do not exist	No more suitable metrics exist. Comments may also relate to difficulties accurately measuring teaching quality.
90	Criticisms of proxies for measuring Learning Environment (LE)	Criticisms and challenges in relation to the collection and use of NSS and continuation rates to measure teaching quality.
47	Current proxies are appropriate	Respondent notes that the current proxies used within TEF are correct and work well to measure teaching excellence.
23	Other	Additional comments, including comments around TEF not being needed.

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**Table A.6: Q15b: 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. Does TEF benchmark for the right factors?**

**Total number of responses = 262**

Number of references	Theme	Definition
241	TEF does not benchmark for the right factors	Respondent notes that they feel that TEF does not benchmark for the right range of factors.
239	Issues with the current benchmarking process	Respondents note problems/challenges with benchmarking provider's student populations. They may also note ways that this process should be improved.
147	Comments relating to region/location	Comments relating to the region/location and the incorporation as this into benchmarking.
125	Agree with the need for benchmarking	Respondents state that they generally agree or feel there is a need for benchmarking. For example, in terms of its role in supporting widening participation.
118	Need to greater range of factors within the benchmarking process	Respondents note a need for a greater range of factors (or more nuance) to be used within the benchmarking of institutions, for example a wider range of student circumstances and community engagement. Comments may note that the range of factors currently used to benchmark are too vague and lack consistency. Respondents may also note that there is currently confusion around the factors used to benchmark or the benchmarking process.
90	TEF does benchmark for the right factors	Respondent notes that they feel that TEF does benchmark for the right range of factors.
26	Metrics/benchmarking should not be used	Respondents note that they do not agree with the use of metrics or benchmarking. Respondents may also state that TEF is not needed.
6	Other	Additional comments

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**Table A.7: Q16a: What are your views about balance of quantitative and qualitative evidence considered in arriving at ratings?**

Number of references	Theme	Definition
131	Importance of qualitative evidence	Respondent commented that there is a need for qualitative evidence and the importance of incorporating this data into the TEF. Respondent may give their view on the role of the submission within TEF. This may include the need for it to have greater or less prominence.
114	Challenges with current quantitative evidence	Respondent may note that current data collection is not working and/or is not fit for purpose. Comments may be around institutions not being able to provide the data and/or not being clear what they are supposed to be providing.
110	Current balance is incorrect	The current balance of quantitative and qualitative data is currently not right. Responses may include reasons for this view.
103	Transparency	Respondent notes the lack of transparency within the process of arriving at the current ratings. Comments may also relate to the actual balance/weighting that occurs between qualitative and quantitative when the independent panel makes judgements.
99	There is a need for both qualitative and quantitative evidence	Respondent feels that there is a need for both qualitative and quantitative evidence to be used within TEF, for example the two types of evidence complement each other. Comments may also relate to the need to balance and/or weight the two types of evidence.
84	Challenges with current qualitative evidence	Respondent may note that current data collection is not working and/or is not fit for purpose. Comments may be around institutions not being able to provide the data and/or not being clear what they are supposed to be providing (for example the criteria are not clear or the submission length does not allow enough space).
69	Current balance is correct	The current balance of quantitative and qualitative data is correct. Responses may include reasons for this view.
40	Other	Additional comments, including respondent stating a view that TEF is not needed.

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**Table A.8: Q16b: Are there any other aspects of the process that you wish to comment on?**

**Total number of responses = 231**

Number of references	Theme	Definition
125	Suggestions for improvements to TEF	Suggestions for additional and/or alternative methods of collecting data, for example teaching observations.
110	Negative impacts of TEF	Respondents noted that they do not feel there is a need for TEF and that its use should not be continued. Responses may include reasons for this view.
94	Use and analysis of quantitative data	Respondent notes issues in terms of the consistency, comparability and reliability of data provided by institutions. Questions may be raised around the need for independent verification of provider data. Response may also note the need for greater consistency in the reporting of data and a clarity around statistical methods that providers should be using.
93	Subject-level TEF	Comments on the subject-level TEF, including the process of grouping subjects, outcomes of the pilot and resources available to administer it
56	Use of funding/resources	Suggestions that TEF is a poor use of funding and/or staff resource that could be better utilised. There may also be suggestions that the process of responding to TEF requirements needs to be less burdensome for providers.
26	Transparency of the process	Respondent notes that they are unsure how the process works, or if/how data and the written submission are assessed for accuracy.
9	Positive comments in relation to TEF	Respondents note positives about TEF. For example, in terms of the results produced or in contrast to other measures of provider quality (e.g. REF).
4	Other	Additional comments

## Section Four: Are the ratings right?

**Table A.9: Question 17a: Are the purposes of TEF met by awarding a single rating**

**Number of responses = 175**

Number of references	Theme	Definition
105	Limitations of having a single rating	Respondent has stated that the single rating has specific limitations. The single rating is insufficient and doesn't reflect complexity.
76	The meaning and/or interpretation of awarding a single rating	Comments that refer to issues around the meaning of a single rating and how it might be interpreted or understood.
52	Alternatives to awarding a single rating	The respondent suggests an alternative approach or model for rating.
31	Single rating straightforward or simple	Comments that the single rating keeps TEF straightforward and simple
28	Range of HE teaching not reflected	Responses discussed the issue that a single rating does not reflect the range or complexity of teaching provided across the HE sector.
27	Single rating is right for the purposes of TEF	The use of a single rating is the most appropriate or suitable for the purposes of the TEF.
23	Borderline cases and the distinctions between ratings	How the ratings compare, issues of the 'cliff edge', different levels of performance within a single rating.
13	Introduction of subject-level TEF	Comments on changes or impacts (positive or negative) likely to result from introducing the subject-level TEF.
27	Other	Additional comments

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**Table A.10: Question 17b: Are the purposes of TEF met with three levels of differentiation, plus a fourth rating for those unable to be assessed**  
 Total number of responses = 175

Number of references	Theme	Definition
40	Factors determining rating and difference between ratings	Discussion of the three ratings, meeting requirements (for gold/silver/bronze), gaining the highest rating and comparisons between the 3.
33	Complexity of HE teaching is not reflected in TEF	Respondent discusses issues around the challenge of rating within the complexity of HEIs and the distinctiveness of different HEIs.
33	The levels of differentiation are the most appropriate	Gold/silver/bronze offer the best or most appropriate means to determine teaching quality.
32	Alternatives to the three levels of differentiation and unable to assess	Respondents who suggest or discuss an alternative ratings system (e.g. a 1-10 scale)
18	Rating system does not provide sufficient detail	This system offers insufficient detail about teaching quality. Therefore, it is not sufficiently informative for students and employers.
10	Importance of simplicity	Statements that a simple scaled rating system is best.
63	Other	Additional comments

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**Table A.11: Question 17c: Are the purposes of TEF met with ratings named gold, silver, bronze, provisional**  
Total number of responses = 205

Number of references	Theme	Definition
92	The meaning and interpretation of the ratings	Discussion regarding how HEIs will be perceived and regarded through this system. For example, how a 'silver' institution will be compared to a 'gold' HEI
54	Bronze rating misunderstood or seen as negative	Specific comments regarding how the bronze rating will/is viewed. The potential for a bronze award to be interpreted as a negative assessment of teaching quality.
45	Inappropriate for use in HE	Respondents who state that it is not appropriate to use this in the HE sector and who outline reasons for this.
22	Implications for competitiveness and international reputation	Discussion of the impact on the international reputation of UK HEIs, systems used internationally and their compatibility to this approach. For example, comparison between the TEF ratings system and global university rankings.
15	Benefits of the gold/silver/bronze/provisional ratings	Responses that outline the benefits for HEIs
47	Other	Additional comments

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**Table A.12: Question 18a: What alternative would you suggest for provider-level TEF**

**Total number of responses = 199**

Number of references	Theme	Definition
30	Additional rating for TEF	Suggestions that TEF rating should be extended e.g. to have a lower level than bronze
22	Learning from other systems	Respondents who discuss approaches used for other assessment systems e.g. REF and compare to TEF or suggest that learning from these systems could inform alternative approaches.
16	Qualitative data only	HEIs should only have to provide qualitative data on teaching performance.
15	Provision of information only (no ratings)	Suggestions that HEIs should only be required to provide information about their teaching quality and not to have it rated by the TEF.
105	Other	Additional comments

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**Table A.13: Question 18b: What alternative would you suggest for subject-level TEF**  
 Total number of responses = 163

Number of references	Theme	Definition
62	Alternative scoring systems	Suggestions of alternatives to the gold/silver/bronze/provisional e.g. score from 1-10 or a 'stars' rating.
19	Provision of information only (no ratings)	Suggestions that there should be no ratings for TEF but instead HEIs should only be required to provide information on teaching quality.
39	Opposition to subject-level TEF	Respondents who do not support the idea of a subject-level TEF and their reasons for this.
25	Other	Additional comments

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**Table A.14: Q18c: Evidence or information that might support your view (impact of TEF on the international reputation of institutions and the UK as a whole)**

**Total number of responses = 106**

<b>Number of references</b>	<b>Theme</b>	<b>Definition</b>
28	How TEF influences international students	Discussion of how students from non-UK countries perceive or respond to TEF and how this may impact on decisions to apply to a UK HEI.
23	Reputation of UK HEIs	Comments about how non-UK students perceive the UK HE sector and the impact of TEF on reputation
12	Perceptions of bronze ratings	Respondents discuss how a rating of 'bronze' will be interpreted or perceived. Misunderstanding of the meaning of a 'bronze' rating.
11	TEF and perceptions from non-UK HEIs	Comments about how TEF and the ratings approach is seen by other countries i.e. by international academic peers
8	Barriers to International students	Discussion of barriers to international students choosing to study in the UK (including the role of TEF)
17	Other	Additional comments

## Section Five: Has TEF changed anything?

**Table A.15: Q19: Has the introduction of TEF positively changed the educational experience of students (e.g. teaching and learning)?**

**Total number of responses = 196**

Number of references	Theme	Definition
168	Greater focus on improving teaching quality	Respondent notes that the TEF has provided an impetus or encouragement for providers to focus on improving the quality of their teaching. Respondents may also note that stakeholders (including students) are more aware of the teaching quality of different providers. Responses may also note that students have better information to make judgements about teaching quality and/or institutions that they attend.
78	No impact	Respondent states that TEF has not impacted on the educational experience of students.
61	Negative impacts of TEF on educational experience	Respondent notes the negative impacts of TEF on students' educational experience.
42	Too early to say	Respondent notes that TEF has not been in place long enough for any impacts (either positive or negative) to be seen.
32	Student engagement	Respondent feels that TEF enables student opinions on teaching quality to be considered to a greater extent.

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**Table A.16: Q20: Has the introduction of TEF negatively changed the educational experience of students (e.g. teaching and learning)?**  
 Total number of responses = 203

Number of references	Theme	Definition
96	Time and resource allocation	TEF has caused time and resources to be diverted away from teaching to the production of documentation/data for TEF. Comments may also relate to teaching staff having less time to teach students as a result and/or reducing funding for teaching staff (e.g. via having whole posts dedicated to TEF).
83	Impacts on the curriculum	Responses may note that TEF is having some impact on shaping the curriculum.
52	No impact	Respondent indicates that they do not consider there to be any positive impacts of TEF on the educational experiences of students. Respondent may also note that there has been no impact of TEF.
48	Impact on teaching staff	Respondent notes the negative impacts on teaching staff (for example increased levels of stress) as a result of TEF. Response may also note that this can lead to negative impacts on teaching quality and student experience.
45	Student engagement	Respondent notes the impacts of TEF on provider engagement with students. Comments may also make reference to the NSS and the impact of TEF on NSS participation.
42	Students as consumers	Respondent notes that the focus of providers has shifted (or increased) towards keeping students happy and seeing them as consumers. Respondent may also note the impacts of this.
30	Too early to say	Respondent notes that TEF has not been in place long enough for any impacts (either positive or negative) to be seen.
25	Impact on student recruitment	Respondent notes that there has been a change in student recruitment to meet quality and/or metric targets, for example in terms of student demographics.

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**Table A.17: Q21: Has the introduction of TEF impacted positively on research and/or knowledge transfer?**  
 Total number of responses = 114

Number of references	Theme	Definition
53	Negative impacts of TEF on research	Respondents noted the negative impacts of TEF on research.
41	No impact	Respondent notes that there has been no impact (including positive impacts) of TEF on research and/or knowledge transfer.
31	Negative impacts of TEF on knowledge transfer	Respondents noted the negative impacts of TEF on knowledge transfer.
20	Too early to say	Respondent notes that TEF has not been in place long enough for any impacts (either positive or negative) to be seen.
1	Other	Additional comments

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**Table A.18: Q22: Has the introduction of TEF impacted negatively on research and/or knowledge transfer?**

**Total number of responses = 166**

Number of references	Theme	Definition
104	Impact on time/resource allocation	TEF has caused time and resources to be diverted away from teaching to producing documentation/data for TEF. Comments may also relate to students having less time from teaching staff as a result and/or reducing funding for teaching staff (via having whole posts dedicated to TEF).
87	Impact on research	Respondents note the impact of TEF on research, including the impact on research staff.
25	No impact	Respondent notes that there has been no impact (including negative impacts) of TEF on research and/or knowledge transfer.
16	Too early to say	Respondent notes that TEF has not been in place long enough for any impacts (either positive or negative) to be seen.
12	Impact on knowledge transfer	Respondent notes the impact of TEF on knowledge transfer, including increased competition.
6	Other	Additional comments

## Section Six: Is TEF worth it?

**Table A.19: Q23. Does TEF help you as a student/student union/provider/employer/other?**

**Total number of responses = 266**

Number of references	Theme	Definition
113	Impact of TEF on teaching and HEIs	Wider comments made about the impact of TEF on the HE sector and academic endeavours and responses that discuss that TEF has resulted in HEIs focussing on teaching and learning. Also discussion of the balance between research and teaching in the HE sector.
69	TEF does not help	Responses stating that TEF has not helped them as a student/student union/provider/employer/other and who also provide reasons for this view.
49	Measurement of HEI performance	Respondent comments on the role of TEF in comparing performance across different HEIs and regarding their own progress against benchmarks
41	Resource implications	The impact of TEF and TEF processes on HEI resources and resource use
28	TEF and student choices	Comments about the impact of TEF on student choices and decision making regarding their prospective higher education
26	Interpretation of TEF ratings	Comments regarding how employers of graduates will understand or interpret the TEF ratings for a given HEI
53	Other	Additional comments

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**Table A.20: Q24a. What are the most significant costs of provider-level TEF?**

**Total number of responses = 242**

<b>Number of references</b>	<b>Theme</b>	<b>Definition</b>
135	Demands on HEI resources	The implications of provider-level TEF for HEI resources including financial and staff costs.
41	Unintended consequences of TEF	Identification of unintended outcomes or consequences as a result of TEF
38	Wider HE sector implications	Wider discussion of the impact of TEF on academia, the HE sector in general, and on staff working in HEIs
26	Costs associated with a provider-level TEF rating	Discussion of the provider-level TEF as an institutional level rating. Implications of variations in teaching quality across different subjects in an HEI
25	Administrative burden	The administrative burden of TEF and how this can/does impact on the delivery of higher education.
16	Other	Additional comments

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**Table A.21: Q24b. What are the most significant costs of subject-level TEF?**

**Total responses = 218**

<b>Number of references</b>	<b>Theme</b>	<b>Definition</b>
135	Resource and administration implications	Respondents who highlight the costs associated with administration of subject-level TEF. Resource implications for HEIs as a result of subject-level TEF.
61	Unintended consequences	Identification of unexpected or unintended consequences as a result of the subject-level TEF
26	Variations on subject delivery and definition	Discussion of the different approaches to defining subject areas and to their delivery across different HEIs. Implications of this for subject-level TEF
22	No benefits from subject-level TEF	No benefits of subject-level TEF identified. Problems with or disadvantages of subject-level TEF outlined.
16	Other	Additional comments

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**Table A.22: Q25a. What are the most significant benefits of provider-level TEF?**

**Total responses = 229**

Number of references	Theme	Definition
76	Greater value is placed on teaching and enhancement	TEF provides a focus on the value of teaching and enhancement in HEIs
67	No benefits identified	Statements that no benefits of TEF can be identified.
37	Comparisons between HE providers	TEF generates data that enables comparisons to be made between different HEIs
27	Information for employers and students	TEF enables both employers and students to be informed about the quality of HEIs
19	Rating of and relationship between teaching and research in the HE sector	TEF means that the focus is not solely on research (via REF) in higher education. More balance between teaching and research in the sector. Impact of TEF on the relationship between research and teaching
41	Other	Additional comments

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**Table A.23: Q25b. What are the most significant benefits of subject-level TEF?**

**Total references = 203**

Number of references	Theme	Definition
74	No benefits of subject-level TEF	No benefits identified by responses. Respondent discussed disadvantages of subject-level TEF
32	Supports between subject comparisons	Subject-level TEF allows comparisons to be made across the subject areas of different HEIs. Better informed choices for prospective students and greater information for employers.
31	Additional measure of HEI quality	subject-level TEF provides an additional measure of HEI quality
25	HEIs can target improvements	Subject-level TEF enables HEIs to focus efforts on improving departments that are not doing as well as others in the institution.
19	More informed decision making	Greater levels of information help students to make more informed decisions when choosing an HEI
34	Other	Additional comments

## Section Seven: Is TEF fair?

**Table A.24: Q26: Are there particular types of students, provision or providers that are disadvantaged by the current design of TEF, in a disproportionate way?**

**Total number of responses = 246**

Number of references	Theme	Definition
157	Suggestions for addressing current disadvantages	Respondent makes suggests for how the current disadvantages could be resolved.
110	Disadvantages due to student characteristics	Respondent notes that particular student groups or providers who are disadvantaged by having certain groups e.g. widening participation students.
76	Disadvantages due to subject and structure of provision	Respondent notes that a particular subject group(s) or type of provision (e.g. part-time, distance learning etc.) disadvantages some providers disproportionately.
56	Other disadvantages	Respondent notes that some providers are disadvantaged by TEF, for example FE colleges. Comments may include the need for fairer reflection of these differences within the awards and to ensure consistency across providers.
48	Disadvantages due to size of provider	Respondent notes disadvantages due to provider size, including resource and staff available to deal with the requirements of TEF, as well as the potential challenges for having a small data set.
46	Disadvantages due to geographical location	Respondent notes disadvantages due to geographical location, including within the employment and earnings metrics.
35	Other	Additional comments

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**Table A.25: Q27a: Are there particular types of students, provision or providers that are advantaged by the current design of TEF, in a disproportionate way?**

**Total number of responses = 185**

Number of references	Theme	Definition
89	Provider advantages	Respondent notes that some types of provider have advantages within the current design of TEF, for example well-established HEIs.
72	Ways to address advantages	Respondent notes way to remove advantages from those advantaged by the current design of TEF.
58	Advantages due to student characteristics	Students from certain socioeconomic backgrounds are at an advantage by the current design of TEF. Reasons for this may or may not be given. Respondents may also have mentioned advantages due to overall mix of students, e.g. characteristics of their student intake/cohort.
50	Negatives of TEF	Respondent notes negatives of TEF, including no students/providers/provision having a disadvantage by TEF current design. Responses may also comment on the need to abandon TEF and issues with current data collection.
37	Provider funding levels	Respondent notes that provider funding levels impact on their success within TEF. Respondent may note that providers with more time, money and resources to invest in TEF do better.
34	Advantages due to subject provision	Providers with a greater proportion of academic subjects are felt to be at an advantage by the current design of TEF.
13	Positives of TEF	Respondent notes positives of TEF, including no students/providers/provision having an advantage due to the current design of TEF.
4	Other	Additional comments

### APPENDIX 3: CALL FOR VIEWS QUESTIONS

#### Questions not included in the analysis

#### Section 1: Who are you?

Question number	Question	Qualitative (text/open)	Quantitative (closed)
1	What is your name?		
2	What is your role/position (if relevant)	✓	
3	What is your email address?		
4	In what capacity are you responding to this consultation?		✓
4	If other (please state)	✓	
5	Are you responding on behalf of an organisation?		✓
5a	If yes, what is the name of your organisation?	✓	
5b	If you are responding on behalf of a higher education provider, has the response been approved by the governing body (or equivalent)?		✓
6	Have you been involved in preparing for or writing a TEF or subject TEF submission?		✓
7	Have you been a TEF assessor or panel member (for provider TEF or in the subject pilots)?		✓
8	Would you like us to keep your responses confidential?		✓
8a	If so, what is the reason for confidentiality?	✓	
9	Please tick to indicate which UK country/other non-UK country you are responding from:		✓
9a	If you are responding for a country outside of the UK, please write this in below:	✓	

#### Section 2: Why have TEF?

Question number	Question	Qualitative (text/open)	Quantitative (closed)
10	Do you support the aim of assessing the quality of teaching excellence and student outcomes across providers of higher education? Please explain your answer.	✓	✓
11a	Which of these is the most important? (select only one option) -providing information -enhancing provision		✓

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	-both are equally important -neither are important		
11b	Please outline below the reasons for your answers.	✓	
12	Should there be any other purposes for TEF?	✓	

**Section 3: How does TEF work?**

Question number	Question	Qualitative (text/open)	Quantitative (closed)
13a	Are the criteria used in TEF appropriate?		✓
13b	If not, what criteria would be more appropriate?	✓	
14a	Are the metrics used in TEF the best proxies for measuring the TEF criteria?		✓
14b	If you answered no, what metrics would be more accurate proxies?	✓	
15a	Should the metrics be benchmarked to allow for difference in a provider's student population?		✓
15b	Does TEF benchmark for the right factors?	✓	
16a	What are your views about the balance of quantitative and qualitative evidence considered in arriving at ratings?	✓	
16b	Are there any other aspects of the process that you wish to comment on?	✓	

**Section 4: Are the ratings right?**

Question number	Question	Qualitative (text/open)	Quantitative (closed)
17a	Are the purpose(s) of TEF met by: awarding a single rating?	✓	✓
17b	Are the purposes of TEF met by: With three levels of differentiation, plus a fourth rating for those unable to be assessed?	✓	✓
17c	Are the purposes of TEF met by: ratings named: gold, silver, bronze and provisionall?	✓	✓
18a	If you answered no, what alternatives you would suggest – Provider-level TEF	✓	
18b	If you answered no, please outline below why and what alternatives you would suggest – Subject-level TEF	✓	
18c	If your previous response reflects on the impact of the TEF on the international reputations of institutions and/or the UK as a whole, we would welcome any evidence or	✓	

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	information you can provide that might support your view or help inform the independent review.		
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**Section 5: Has TEF changed anything?**

Question number	Question	Qualitative (text/open)	Quantitative (closed)
19	Has the introduction of TEF <u>positively</u> changed the educational experience of students?	✓	✓
20	Has the introduction of TEF <u>negatively</u> changed the educational experience of students?	✓	✓
21	Has the introduction of TEF impacted <u>positively</u> on research and/or knowledge transfer?	✓	✓
22	Has the introduction of TEF impacted <u>negatively</u> on research and/or knowledge transfer?	✓	✓

**Section 6: Is TEF worth it?**

Question number	Question	Qualitative (text/open)	Quantitative (closed)
23	Does TEF help you as a student/provider/employer?	✓	✓
24a	Explaining your reasoning, what are the most significant costs of provider level TEF?.	✓	
24b	What are the most significant costs of subject level TEF?	✓	
25	What are the most significant benefits of provider-level TEF?	✓	
25b	What are the most significant benefits of subject-level TEF?	✓	

**Section 7: Is TEF fair?**

26	Are there particular types of students, provision or provider that are <u>disadvantaged</u> by the current design of TEF, in a disproportionate way?		✓
26a	If yes, what changes could be made to address these?	✓	
27	Are there particular types of students, provision or provider that are advantaged by the current design of TEF, in a disproportionate way?		✓
27a	If yes, what changes could be made to address this?	✓	

## APPENDIX 4: ADDITIONAL QUANTITATIVE ANALYSIS

This annex provides an analysis of all 15 quantitative questions within the call for views by the following sub groups:

1. FE colleges responses, compared with the FE mission group response
2. Whether responses were approved or not by the institution's governing body

### **(1) FE colleges responses and FE mission group response**

This section provides a comparison of the FE colleges' responses and the mission group response (Association of Colleges) submitted to the call for views. Due to the small numbers (i.e. 17 FE colleges and one mission group), this has been presented as a series of bullet points under the section headings. Note also that the mission group did not provide a response in relation to Section Six (Is TEF worth it?).

- **Section Two: Why have TEF?**
  - All FE colleges, including the mission group supported the aim of assessing the quality of teaching excellence and student outcomes across providers of higher education.
  - The FE mission group stated that the most important purpose of TEF was to enhance provision. Whilst, 41% of FE colleges also took this view, a slightly greater proportion (47%) felt that both enhancing provision and providing information were the most important purposes of TEF.
- **Section Three: How well does TEF work?**
  - The FE mission group felt that the criteria currently used within TEF was appropriate, this concurred with the views of over half (53%) of FE college responses.
  - The FE mission group also agreed with the view of the majority of FE colleges in relation to whether the metrics used within TEF are the best proxies for measuring the TEF criteria. Just under three-quarters (71%) of FE colleges said that the metrics were not the best proxies, compared with 29% who answered 'yes'.
  - All FE colleges and the mission group felt that the metrics should be benchmarked to allow for differences in a provider's student population.
- **Section Four: Are the ratings right?**
  - The FE college mission group felt that the purposes of TEF are met by the current levels of differentiation – this compared with equal numbers of FE colleges who answered 'yes' and 'no' to Question 17b<sup>22</sup>.
  - The FE college mission group disagreed with the majority of respondents from FE colleges in relation to whether the purposes of TEF are met by ratings named gold, silver, bronze and provisional. Whilst just over half (56%) of FE colleges felt the purposes were met by these ratings, the mission group felt that they were not.

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<sup>22</sup> Are the purposes of TEF met with three levels of differentiation, plus a fourth rating for those unable to be assessed?

- **Section Five: Has TEF changed anything?**
  - Just over two-fifths (41%)<sup>23</sup> of FE college respondents felt that the introduction of TEF had not positively changed the educational experience of students, a view echoed by the mission group.
  - In answer to Question 20 – has the introduction of TEF negatively changed the educational experience of students – 71% of FE colleges and the mission group answered ‘no’.
  - The mission group choose not to comment on Questions 21 and 22 (the impacts of TEF on research and/or knowledge transfer). This reflected the high level of FE colleges who answered ‘don’t know’ for these questions.
- **Section Seven: Is TEF fair?**
  - There was consensus amongst FE college respondents and the mission group that particular types of student, provision or providers are disadvantaged by the current design of TEF in a disproportionate way. This was a similar picture for question 27 (whether particular types of student, provision or providers are advantaged by the current design of TEF in a disproportionate way).

## **(2) Approval by the governing body**

This section presents the quantitative data by whether (or not) the response submitted to the call for views had been approved by the governing body. A total of 120 responses had been approved by the governing body and 61 had not.

Overall, the analysis has found very little difference between the views of responses that had been approved by the governing body and those that had not. There are a few isolated examples where views differ, including whether the introduction of TEF has positively changed the educational experience of students (Question 19).

### **Section Two: Why have TEF?**

Over three quarters of both respondent groups supported the aim of assessing the quality of teaching excellence and student outcomes (Table A.26). This view was strongest amongst responses that had been approved by the governing body.

**Table A.26: Do you support the aim of assessing the quality of teaching excellence and student outcomes across providers of higher education? (Question 10)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Response approved by governing body (n=118)	108	92%	5	4%	5	4%
Response not approved by governing body (n=61)	48	79%	7	11%	6	10%
<b>Total (n=179)</b>	<b>156</b>	<b>87%</b>	<b>12</b>	<b>7%</b>	<b>11</b>	<b>6%</b>

*\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.*

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<sup>23</sup> 29% answered ‘yes’ and ‘don’t know’

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Over half of respondents felt that enhancing provision was the most important purpose of TEF (Table A.27). There were no differences in the responses between those that had and had not been approved by the governing body.

**Table A.27: These purposes fall into two main areas: providing information and enhancing the provision of higher education. Which of these is the most important? (Question 11a)\***

Respondent group	Providing information		Enhancing provision		Both are equally important		Neither are important	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Response approved by governing body (n=117)	7	6%	66	56%	44	38%	3	3%
Response not approved by governing body (n=61)	5	8%	32	52%	19	31%	5	8%
<b>Total (n=178)</b>	<b>12</b>	<b>7%</b>	<b>98</b>	<b>55%</b>	<b>63</b>	<b>35%</b>	<b>8</b>	<b>4%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

### Section Three: How Well Does TEF Work?

As with Question 11a above, there were no differences in responses by whether they had or had not been approved by the governing body (Table A.28). There were also similar numbers of responses answering 'yes' and 'no' to this question.

**Table A.28: Are the criteria used in TEF appropriate? (Question 13)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Response approved by governing body (n=117)	54	46%	55	47%	8	7%
Response not approved by governing body (n=59)	25	42%	29	49%	5	8%
<b>Total (n=176)</b>	<b>79</b>	<b>45%</b>	<b>84</b>	<b>48%</b>	<b>13</b>	<b>7%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

Again, there were no substantial differences in the responses by whether or not they had been approved by the governing body in response to Question 14a. Most respondents felt that the metrics used within TEF were not the best proxies for measuring the TEF criteria.

**Table A.29: Are the metrics used in TEF the best proxies for measuring the TEF criteria? (Question 14a)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Response approved by governing body (n=116)	11	9%	95	82%	10	9%
Response not approved by governing body (n=59)	7	12%	46	78%	6	10%
<b>Total (n=175)</b>	<b>18</b>	<b>10%</b>	<b>141</b>	<b>81%</b>	<b>16</b>	<b>9%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

No substantial differences by whether or not the response had been approved by the governing body were seen in the responses to Question 15. Table A.30 though shows that the majority of respondents felt that the metrics should be benchmarked to allow for differences in a provider's student population.

**Table A.30: Should the metrics be benchmarked to allow for difference in a provider's student population? (Question 15a)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Response approved by governing body (n=120)	103	86%	7	6%	4	3%
Response not approved by governing body (n=61)	45	74%	7	11%	6	10%
<b>Total (n=181)</b>	<b>148</b>	<b>82%</b>	<b>14</b>	<b>8%</b>	<b>10</b>	<b>6%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

#### Section Four: Are the ratings right?

A similar picture emerged for Question 17a. A higher proportion of responses that had been approved by the governing body answered 'no' (64%), though this was not substantially higher than responses not approved by the governing body (55%).

**Table A.31: Are the purposes of TEF met by awarding a single rating? (Question 17a)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Response approved by governing body (n=114)	33	29%	73	64%	6	5%
Response not approved by governing body (n=58)	21	36%	32	55%	5	9%
<b>Total (n=172)</b>	<b>54</b>	<b>31%</b>	<b>105</b>	<b>61%</b>	<b>11</b>	<b>6%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

Table A.32 does not show any substantial differences in the views of the two respondent groups.

**Table A.32: Are the purposes of TEF met with three levels of differentiation, plus a fourth rating for those unable to be assessed? (Question 17b)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Response approved by governing body (n=112)	24	21%	72	64%	12	11%
Response not approved by governing body (n=58)	11	19%	38	66%	7	12%
<b>Total (n=170)</b>	<b>35</b>	<b>21%</b>	<b>110</b>	<b>65%</b>	<b>19</b>	<b>11%</b>

*\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.*

As with Question 17b above, Table A.33 shows that there were no substantial differences between the views expressed in responses approved by the governing body and those where approval was not sought/gained.

**Table A.33: Are the purposes of TEF met by ratings named gold, silver, bronze and provisional? (Question 17c)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Response approved by governing body (n=108)	16	15%	82	76%	11	10%
Response not approved by governing body (n=56)	9	16%	39	70%	10	18%
<b>Total (n=164)</b>	<b>25</b>	<b>15%</b>	<b>121</b>	<b>74%</b>	<b>21</b>	<b>13%</b>

*\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.*

### Section Five: Has TEF changed anything?

Table A.34 is the first result where the views of responses approved by the governing body, compared with those that have not been approved have differed. Amongst the responses that had been approved by the governing body, 44% answered 'yes', whereas 45% of responses that had not received approval answered 'no'.

**Table A.34: Has the introduction of TEF positively changed the educational experience of students (e.g. teaching and learning)? (Question 19)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Response approved by governing body (n=109)	48	44%	37	34%	29	27%
Response not approved by governing body (n=58)	20	34%	26	45%	13	22%
<b>Total (n=167)</b>	<b>68</b>	<b>41%</b>	<b>63</b>	<b>38%</b>	<b>42</b>	<b>25%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

There are no differences in the views between the two respondent groups in relation to Question 20 – in fact the view across both groups was mixed (Table A.35).

**Table A.35: Has the introduction of TEF negatively changed the educational experience of students (e.g. teaching and learning)? (Question 20)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Response approved by governing body (n=114)	36	32%	44	39%	33	29%
Response not approved by governing body (n=59)	19	32%	24	41%	16	27%
<b>Total (n=173)</b>	<b>55</b>	<b>32%</b>	<b>68</b>	<b>39%</b>	<b>49</b>	<b>28%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

Table A.36 shows that a higher proportion (66%) of responses that had not been approved by the governing body answered 'no' to Question 21, compared with less than half (48%) of responses that had been approved. Responses that had been approved were more likely to answer 'yes' and 'don't know'.

**Table A.36: Has the introduction of TEF impacted positively on research and/or knowledge transfer? (Question 21)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Response approved by governing body (n=110)	17	15%	53	48%	40	36%
Response not approved by governing body (n=58)	5	9%	38	66%	15	26%
<b>Total (n=168)</b>	<b>22</b>	<b>13%</b>	<b>91</b>	<b>54%</b>	<b>55</b>	<b>33%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

Responses that had been approved by the governing body were more likely to answer 'yes' to Question 22 and less likely to answer 'no' than responses that had not been approved by the governing body (Table A.37).

**Table A.37: Has the introduction of TEF impacted negatively on research and/or knowledge transfer? (Question 22)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Response approved by governing body (n=114)	23	20%	50	44%	41	36%
Response not approved by governing body (n=57)	18	32%	22	39%	17	30%
<b>Total (n=171)</b>	<b>41</b>	<b>24%</b>	<b>72</b>	<b>42%</b>	<b>58</b>	<b>34%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

### Section Six: Is TEF worth it?

Similar proportions of responses that had, and had not, been approved by the governing body answered 'yes' and 'no' to this question (Table A38), though there was a slightly more positive response by submissions that had been approved by the governing body (47% compared with 40%).

**Table A.38: Does TEF help you as a student/student union/provider/employer/other? (Question 23)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Response approved by governing body (n=109)	51	47%	39	36%	19	17%
Response not approved by governing body (n=57)	23	40%	25	44%	9	16%
<b>Total (n=166)</b>	<b>74</b>	<b>45%</b>	<b>64</b>	<b>39%</b>	<b>28</b>	<b>17%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

### Section Seven: Is TEF fair?

Responses that had been approved by the governing body were more likely to answer 'yes' to this question (88% compared with 76% of responses not approved). Table A.39 shows that responses that had not been approved were more likely (than responses that had been approved) to answer 'don't know'.

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**Table A.39: Are there particular types of student, provision or providers that are disadvantaged by the current design of TEF in a disproportionate way? (Question 26)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Response approved by governing body (n=109)	96	88%	4	4%	9	8%
Response not approved by governing body (n=59)	45	76%	4	7%	10	17%
<b>Total (n=168)</b>	<b>141</b>	<b>84%</b>	<b>8</b>	<b>5%</b>	<b>19</b>	<b>11%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

Responses that had been approved by the governing body were more likely to answer 'yes' (73% compared with 53% of responses not approved). As with Question 26, responses that had not been approved were also more likely (than those that had been approved) to answer 'don't know'.

**Table A.40: Are there particular types of student, provision or providers that are advantaged by the current design of TEF in a disproportionate way? (Question 27)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Response approved by governing body (n=100)	73	73%	12	12%	15	15%
Response not approved by governing body (n=53)	28	53%	8	15%	17	32%
<b>Total (n=153)</b>	<b>101</b>	<b>66%</b>	<b>20</b>	<b>13%</b>	<b>32</b>	<b>21%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

## APPENDIX 5: SUGGESTIONS FOR ALTERNATIVES TO TEF

Additional analysis was requested by the Independent Review to identify suggestions for alternatives to TEF and TEF ratings. The method involved the following stages:

- Review of 342 coded references from the online responses and responses received via email.
- Suggestions for alternatives to TEF were categorised and the proportion of coded references for each category was calculated.
- Collation of suggestions and the proportion of all coded suggestions under key headings:
  1. Additional or alternative ratings or assessments for TEF (36% of coding)
  2. Learning from other systems (27% of coding)
  3. Provision of information and/or qualitative data only (22%)
  4. Alternative mark of excellence (8% of coding)
  5. Other suggestions (5% of coding)
  6. No competitive or judgement assessments of teaching quality (2% of coding)

Of the 342 coded references that were reviewed, **233** outlined suggestions for alternatives to the provider level and/or subject-level TEF. The results for each of the six categories and the proportion for each suggestion are shown below.

### (1). Additional or alternative ratings or assessments for TEF

This category accounted for **36%** of all the coded suggestions.

**Table A.41: Suggestions for additional or alternative ratings or assessments for TEF by the proportions of suggestions coded**

Suggestions proposed	% of coded references for this category	% of all coded suggestions
Commendations (formal recognition of particular areas of excellence) (e.g. TEF accredited (distinction))	14%	5%
Star rating system	9.5%	3%
Binary models e.g. approved/not approved or pass/fail	8%	3%
Scoring systems e.g. scale of 1-10 /points awarded	18%	6%
Greater number of categories or levels for awards (e.g. bronze**/provisional silver/bronze improving)/silver ++	<b>39%</b>	<b>14%</b>
Remove bronze award (i.e. silver/gold only)	1%	0.4%
GSPB ratings + descriptive narrative	5%	2%
New names e.g. low/middle/high, effective/limited effectiveness/high effectiveness, meets expectations/excellent/outstanding	5%	2%

## (2). Learning from other systems

This category accounted for **27%** of all coded suggestions.

**Table A.42: Suggestions for learning from other systems by the proportions of suggestions coded**

Suggestions proposed	% of coded references for this category	% of all coded suggestions
Same as used for REF (Research Excellence Framework)	<b>47%</b>	<b>13%</b>
QAA Quality Enhancement Review (Wales)	8%	2%
Same as KEF (Knowledge Exchange Framework)	19%	5%
Similar to approach for Athena-Swan (development & action planning)	3%	1%
The Scottish Enhancement-led Institutional Review (ELIR) system/ QEF	8%	2%
CQC/Ofsted (e.g. good/outstanding)	14%	4%
Similar to the KIS (University Key Information Sets)	1.5%	0.4%

## (3). Provision of information and/or qualitative data only

This category accounted for **22%** of all coded suggestions.

**Table A.43: Suggestions for provision of information and/or qualitative data only by the proportions of coded suggestions**

Suggestions proposed	% of coded references for this category	% of all coded suggestions
Narrative judgements/reports only (both provider level and subject level TEF)	<b>55%</b>	<b>12%</b>
HEI specific qualitative information only (e.g. on types of teaching, improved Unistats)	31%	7%
Summary of underlying metrics/data only	10%	2%
Assessment of HEI investment and/or learning environments	4%	0.8%

## (4). Alternative rating or mark of excellence

This category accounted for **8%** of all coded references that provided suggestions for alternatives to TEF.

**Table A.44: Suggestions for alternative rating of mark of excellence by proportions of suggestions coded**

Suggestions proposed	% of coded references for this category	% of all coded suggestions
Separate awards for the different purposes of TEF (e.g. teaching, learning environment, outcomes)	22%	2%
Ratings only for HEIs that are performing well above the benchmark and accompanying narrative	<b>39%</b>	<b>3%</b>
Single award (e.g. TEF quality assured, TEF Kitemark)	<b>39%</b>	<b>3%</b>

### (5). Other suggestions

This category accounted for **5%** of all coded suggestions.

**Table A.45: Other suggestions by the proportions of suggestions coded**

Suggestions proposed	% of coded references for this category	% of all coded references
Additional options e.g. fail	8%	0.4%
Student voice central part of any assessment	8%	0.4%
Dashboard (e.g. for subject-level TEF)	17%	0.8%
More gradings for subject-level TEF	<b>58%</b>	<b>3%</b>
Quality assurance process	8%	0.4%

### (6). No competitive or judgement assessments of teaching quality

This category accounted for **2%** of all coded suggestions.

**Table A.46: Suggestions for no competitive or judgements assessments of teaching quality by the proportions of suggestions coded**

Suggestions proposed	% of coded references for this category	% of all coded suggestions
Praise for areas of strong/excellent performance	25%	0.4%
Range of HEI information resources – videos, visit days, websites etc.	<b>75%</b>	<b>1%</b>

The results for alternative suggestions for TEF were varied across the difference sub-categories, however suggestions that outlined **‘additional or alternative ratings or assessments’** accounted for the largest proportion (more than one third) of the coded references overall. The second largest proportion was the references coded under **‘learning from other systems’** accounting for more than one quarter of all coded references.

Across all the categories **‘Greater number of categories or levels for awards (e.g. bronze\*\*/provisional silver/bronze improving/silver ++)’** was most frequently mentioned by respondents. These responses outlined the view that greater granularity or levels of detail were required for the GSBP ratings. This would provide a more nuanced rating and address the issue of ‘cliff edges’ in the ratings currently being used.

Other frequently mentioned categories were as follows:

- The view that a system for TEF similar to/or the same as that used for the REF (Research Excellence Framework) was widely proposed. This was seen to offer a better approach than the current model, and comparability across both systems.
- The use of narrative reports and/or judgements were also frequently mentioned. Those outlining this view discussed that this approach would be particularly appropriate for subject-level TEF and that qualitative data was a more appropriate approach to assessment and judgement of teaching excellence and student outcomes.

## APPENDIX 6: PRE AND POST 1992 COMPARISONS

Additional analysis was requested by the Independent Review specifically to explore the responses from two sub-groups of the publicly funded higher education providers group. The two groups were:

1. Pre-1992<sup>24</sup> providers (n=41), and
2. Post-1992<sup>25</sup> providers (n=70)

The method used involved analysis of both the closed (quantitative) and open (qualitative) responses. Coding (using NVivo) was analysed by each of the sub-groups (pre-1992 and post-1992) in order to identify areas where there were differences in views (proportions of coded references were compared). The results are discussed under each of the six sections of the call for views.

### Why have TEF?

Table A.47 below shows that the vast majority (95%) of both pre and post-1992 providers supported the aim of assessing the quality of teaching excellence and student outcomes. This did not differ between pre and post-1992 providers.

**Table A.47: Do you support the aim of assessing the quality of teaching excellence and student outcomes across providers of higher education? (Question 10)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Pre-1992 (n=41)	38	93%	2	5%	1	2%
Post-1992 (n=70)	67	96%	1	1%	2	3%
<b>Total (n=111)</b>	<b>105</b>	<b>95%</b>	<b>3</b>	<b>3%</b>	<b>3</b>	<b>3%</b>

*\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.*

A similar picture is seen within responses to Question 11a – in that no differences are seen between responses from pre and post 1992 providers (Table A.48). Around three-fifths of both groups felt that enhancing provision was the most important purpose of TEF. Slightly more post-1992 providers (39%) felt that both providing information and enhancing provision were equally important purposes of TEF, compared with 27% of pre-1992 providers.

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<sup>24</sup> Pre-1992 HEIs were established before the 'Further and Higher Education Act 1992.'

<sup>25</sup> Post-1992 "HEIs which acquired university status as a result of the provisions of the Further and Higher Education Act 1992." HEFCE (sourced 2019)

**Table A.48: These purposes fall into two main areas: providing information and enhancing the provision of higher education. Which of these is the most important? (Question 11a)\***

Respondent group	Providing information		Enhancing provision		Both are equally important		Neither are important	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Pre-1992 (n=41)	3	7%	25	61%	11	27%	2	5%
Post-1992 (n=70)	1	1%	42	60%	27	39%	0	-
<b>Total (n=111)</b>	<b>4</b>	<b>4%</b>	<b>67</b>	<b>60%</b>	<b>38</b>	<b>34%</b>	<b>2</b>	<b>2%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

With regards to qualitative responses, the proportion of reference codes for the two provider groups (pre and post 1992) were similar for most of the responses to this section, except for two codes:

- Among the post-1992 provider group, a greater proportion of the coded references related to views regarding enhancing provision as the most important purpose of TEF compared to the pre-1992 group, and
- There was a greater level of discussion relating to there being no other purposes for TEF among the post-1992 provider group.

#### ***Enhancing provision more important***

Both the pre-1992 and post-1992 provider groups expressed a view that enhancing provision was the more important purpose because of the wide range of information already available to students and because of the role of TEF in driving quality improvement and enhancement activity in HEIs. However, these perceptions were mentioned to a greater extent among the post-1992 group.

The post-1992 provider group discussed the role of data in supporting enhancement, the greater benefits and impact for HEIs in relation to enhancement, based on their own experience and evidence. These issues did not feature in the responses provided by the pre-1992 providers, but this group did make greater mention of the role of TEF in encouraging HEIs to prioritise enhancement activities.

#### ***No other purposes for TEF***

Among the **post-1992** group, the views expressed that there should be no other purposes for TEF addressed the following:

- That the TEF should have clear boundaries and that these should not be breached to meet other purposes.
- That there should be no other purposes for TEF until the metrics and data are right, the TEF has become established, and its success evidenced.
- The view that other purposes for TEF would be too costly and demanding on HEIs.

In contrast to this, the smaller proportion of coded references among the pre-1992 group, primarily outlined concerns that other purposes for TEF would cause confusion and have

the potential to generate unclear aims and significant problems associated with multiple purposes.

### **How well does TEF Work?**

Table A.49 below shows that whilst responses from pre-1992 providers were equally split between saying that the current TEF criteria are and aren't appropriate, post-1992 providers were more likely to say that the current criteria is appropriate.

**Table A.49: Are the criteria used in TEF appropriate? (Question 13)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Pre-1992 (n=39)	18	46%	19	49%	2	5%
Post-1992 (n=69)	43	62%	24	35%	2	3%
<b>Total (n=108)</b>	<b>61</b>	<b>56%</b>	<b>43</b>	<b>40%</b>	<b>4</b>	<b>4%</b>

*\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.*

Table A.50 shows that over three-quarters of both respondent groups felt that the current metrics are not the best proxies for measuring the TEF criteria. There was stronger agreement with this view amongst pre-1992 providers (93% answered 'no'), compared with just over three-quarters (78%) of post-1992 institutions.

**Table A.50: Are the metrics used in TEF the best proxies for measuring the TEF criteria? (Question 14a)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Pre-1992 (n=40)	1	3%	37	93%	2	5%
Post-1992 (n=69)	11	16%	54	78%	4	6%
<b>Total (n=109)</b>	<b>12</b>	<b>11%</b>	<b>91</b>	<b>83%</b>	<b>6</b>	<b>6%</b>

*\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.*

There was strong support amongst both groups for benchmarking of the metrics (Table A.51), though there was stronger agreement amongst post-1992 providers (96% answered 'yes'). Although the majority of pre-1992 respondents answered 'yes', nearly a fifth said 'no'.

**Table A.51: Should the metrics be benchmarked to allow for difference in a provider's student population? (Question 15a)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Pre-1992 (n=40)	32	80%	7	18%	1	3%
Post-1992 (n=69)	66	96%	0	0%	3	4%
<b>Total (n=109)</b>	<b>98</b>	<b>90%</b>	<b>7</b>	<b>6%</b>	<b>4</b>	<b>4%</b>

*\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.*

With regards to qualitative responses within Section Three, the proportion of reference codes for the two provider groups (pre and post 1992) were similar for most of the codes, with the exception of three:

- A higher proportion of post-1992 providers felt that the current employment and earnings criteria and metrics were not an appropriate measure for teaching quality;

- More references were coded for pre-1992 in relation to criticisms with the grade inflation metrics not being an appropriate measure of teaching excellence;
- Pre and post-1992 providers had differing views on the main challenges with the current process of benchmarking.

### ***Employment and earnings criteria and metrics***

Although noted by respondents from both groups, a higher proportion of post-1992 providers criticised the current metrics for failing to take into account:

- Geographical location of the provider and the strength of the local labour market;
- The socioeconomic diversity of a providers' intake of students (e.g. background, ethnicity, distance travelled to attend provider etc.);
- Motivations of students for undertaking higher education courses;
- Social value of studying certain subjects (e.g. arts or theology courses).

### ***Grade inflation***

Those from pre-1992 providers were more likely (than post-1992 providers) to note challenges with the grade inflation metrics – labelling improvements in grades as 'inflation' was felt to have the potential to mask any actual improvements.

### ***Benchmarking of the metrics***

Both pre and post 1992 providers felt that the benchmarking process currently did not account for geographic variation. There were however differences in views between the respondent groups on the other main issues within the current benchmarking process:

- Pre-1992 providers were most likely to highlight lack of clarity and transparency with the benchmarking process as a key challenge;
- Whereas, post-1992 providers were most likely to say that the benchmarking process needs to include a greater complexity of factors (e.g. socioeconomic background of the student population etc.).

### **Are the ratings right?**

Although the overall view of the majority of both pre and post-1992 providers was that the purposes of TEF are not met by awarding a single rating, this view was stronger amongst pre-1992 providers (72%), compared with just over half (59%) of post-1992 providers.

**Table A.52: Are the purposes of TEF met by awarding a single rating? (Question 17a)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Pre-1992 (n=39)	10	26%	28	72%	1	3%
Post-1992 (n=68)	22	32%	40	59%	6	9%
<b>Total (n=107)</b>	<b>32</b>	<b>30%</b>	<b>68</b>	<b>64%</b>	<b>7</b>	<b>7%</b>

\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.

Table A.53 shows that over three-fifths of both pre and post-1992 providers felt that the purposes of TEF are not met with the current levels of differentiation. This view was strongest amongst pre-1992 providers.

**Table A.53: Are the purposes of TEF met with three levels of differentiation, plus a fourth rating for those unable to be assessed? (Question 17b)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Pre-1992 (n=39)	6	15%	31	79%	2	5%
Post-1992 (n=65)	16	25%	42	65%	7	11%
<b>Total (n=104)</b>	<b>22</b>	<b>21%</b>	<b>73</b>	<b>70%</b>	<b>9</b>	<b>9%</b>

*\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.*

A similar picture emerges with responses to Question 17c. Although both groups felt that the purposes of TEF were not met by ratings named gold, silver, bronze and provisional, this view was strongest amongst pre-1992 providers (88%), compared with a fifth of post-1992 providers who answered 'yes'.

**Table A.54: Are the purposes of TEF met by ratings named gold, silver, bronze and provisional? (Question 17c)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Pre-1992 (n=40)	2	5%	35	88%	3	8%
Post-1992 (n=65)	13	20%	43	66%	9	14%
<b>Total (n=105)</b>	<b>15</b>	<b>14%</b>	<b>78</b>	<b>74%</b>	<b>12</b>	<b>11%</b>

*\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.*

The qualitative evidence concurs with the quantitative responses. There was no difference between the proportion of coded references for the pre and post 1992 provider groups, for half of the codes. However, there was a difference in the coded references that expressed positive views in relation to the purpose(s) of TEF being met by: awarding a single rating, with three levels of differentiation, plus a fourth rating for those unable to be assessed, and ratings named gold, silver, bronze and provisional – with the larger proportion of these references being among the post-1992 provider group.

#### **Positive view on the ratings**

Among the **pre-1992** provider group, positive views regarding the ratings (the purposes of TEF being met by the single rating, with three level of differentiation, plus a fourth rating for those unable to be assessed, and with ratings named gold, silver, bronze and provisional) related to the following:

- That a single rating was straightforward and provides a “general sense” of HEI performance, and
- These ratings, while blunt, were preferable to many nuanced assessments/outcomes. As such they were probably the most appropriate for meeting student needs.

In contrast to this, the larger proportion of post-1992 providers who expressed positive views on the ratings, consistently outlined a perception that the ratings were appropriate

because they were simple, clear, easily understood and helpful. More than one half of the coded references provided this view.

Furthermore, the post-1992 group were more likely to express the view that the ratings named GSBP were widely understood and recognised by students and others.

#### **Has TEF changed anything?**

The largest proportions of pre and post-1992 providers answered ‘yes’ (i.e. the introduction of TEF has positively changed the educational experience of students) – though this was only around half of all respondents. This view was strongest amongst post-1992 providers.

**Table A.55: Has the introduction of TEF positively changed the educational experience of students (e.g. teaching and learning)? (Question 19)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Pre-1992 (n=40)	17	43%	12	30%	11	28%
Post-1992 (n=70)	37	53%	18	26%	15	21%
<b>Total (n=110)</b>	<b>54</b>	<b>49%</b>	<b>30</b>	<b>27%</b>	<b>26</b>	<b>24%</b>

*\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.*

In response to Question 20, just under half of all respondents answered ‘no’, whilst around a quarter of both groups answered ‘yes’. There were no differences between pre and post-1992 respondent groups.

**Table A.56: Has the introduction of TEF negatively changed the educational experience of students (e.g. teaching and learning)? (Question 20)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Pre-1992 (n=38)	11	29%	16	42%	11	29%
Post-1992 (n=70)	17	24%	32	46%	21	30%
<b>Total (n=108)</b>	<b>28</b>	<b>26%</b>	<b>48</b>	<b>44%</b>	<b>32</b>	<b>30%</b>

*\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.*

Table A.57 shows that just over half of both pre and post-1992 providers felt that the introduction of TEF had not positively impacted on research and/or knowledge transfer. This view was taken by a slightly higher number of pre-1992 institutions.

**Table A.57: Has the introduction of TEF impacted positively on research and/or knowledge transfer? (Question 21)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Pre-1992 (n=39)	4	10%	25	64%	10	26%
Post-1992 (n=68)	14	21%	36	53%	18	26%
<b>Total (n=107)</b>	<b>18</b>	<b>17%</b>	<b>61</b>	<b>57%</b>	<b>28</b>	<b>26%</b>

*\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.*

Table A.58 below shows that a higher proportion of post-1992 providers (62% compared with 45% of pre-1992 providers) felt that TEF had negatively impacted on research and/or knowledge transfer.

**Table A.58: Has the introduction of TEF impacted negatively on research and/or knowledge transfer? (Question 22)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Pre-1992 (n=40)	9	23%	18	45%	13	33%
Post-1992 (n=65)	9	14%	40	62%	16	25%
<b>Total (n=105)</b>	<b>18</b>	<b>17%</b>	<b>58</b>	<b>55%</b>	<b>29</b>	<b>28%</b>

*\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.*

No substantial differences were seen in the views between the two respondent groups within the qualitative responses to any of the Section Five questions. Similar proportions of responses from both pre and post-1992 providers were seen in relation to:

- The main positive resulting from the introduction of TEF was felt to be providers having a greater focus on improving teaching quality;
- Both respondent groups indicated similar levels of agreement that TEF had driven a greater focus on improving teaching, due to the need to meet the requirements of TEF;
- Across both respondent groups the main negative impact on student experience and research and knowledge transfer was felt to be the diversion of time and resource to meet the requirements of TEF.

The only area where any differences were seen in views between the two groups was in relation to the primary negative impacts of TEF on the educational experience of students.

#### ***Negative impacts of TEF on educational experience***

Of the respondents who did note a negative impact on the educational experience of students as a result of the introduction of TEF:

- Post-1992 providers were most likely (and more likely than pre-1992 providers) to say that TEF had resulted in a negative impact on the curriculum (e.g. less innovation);
- Whilst pre-1992 providers accounted for a higher proportion of coded references in relation to reduced staff time and resource for teaching as a result of the need to satisfy the requirements of TEF. This, it was felt, has resulted in a poorer quality experience for students.

#### **Is TEF worth it?**

Table A.59 shows that just over half of both respondent groups answered 'yes' in answer to Question 23. There were no significant differences between responses from pre and post-1992 providers.

**Table A.59: Does TEF help you as a student/student union/provider/employer/other? (Question 23)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Pre-1992 (n=39)	21	54%	14	36%	4	10%
Post-1992 (n=66)	35	53%	21	32%	10	15%
<b>Total (n=105)</b>	<b>56</b>	<b>53%</b>	<b>35</b>	<b>33%</b>	<b>14</b>	<b>13%</b>

*\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.*

For the qualitative responses, the main differences in the coded references related to three codes as follows:

- A greater proportion of the post-1992 group expressed views on the costs of TEF in relation to demands on time, administration and staff resources;
- The pre-1992 group accounted for the larger proportion of coding references that expressed views on the costs of unintended impacts from the TEF (e.g. opportunity costs and diversion from teaching and enhancement activities); and
- For the post-1992 group a greater proportion of references were coded to 'the benefit of TEF in providing a marketing and promotional opportunity'.

#### ***Costs – demands on time administration and staff resources***

The range of views expressed in relation to TEF costs associated with administration, time and staffing were similar for both groups. Key observations for where views differ are as follows:

- The pre-1992 providers made greater reference to the higher costs associated with preparing for the subject level TEF when compared to the post-1992 group.
- The post-1992 providers made greater reference to the costs of involving senior staff in preparing submissions and co-ordinating outputs for TEF.
- Only those in the post-1992 group expressed views about the higher costs faced by smaller institutions and those associated with TEF reporting and publicity activities.

#### ***Costs – unintended impacts***

The larger proportion of coded references for the pre-1992 group expressed a range of views on the unintended impacts and costs associated with both provider and subject level TEF as follows:

- Most expressed a view that TEF diverts and distracts from core HE activities such as teaching and enhancement.
- Smaller proportions discussed that:
  - HEIs will tend to focus on optimising their metrics and that this will divert them away from key HE activities such as teaching,
  - that there will be negative impacts on staff morale, unexpected costs associated with the IT requirements for TEF, and
  - the potential for the duplication of assessment activities.

The post-1992 group had a smaller proportion of coded references most of which outlined the shared view that TEF will divert and distract from core HEI activities. However, this

group frequently mentioned that this would have a disproportionate impact on the smaller providers.

***Benefits – providing a marketing and promotional opportunity***

The post-1992 provider group were much more likely to mention the marketing and promotional benefits for them as a result of both provider-level and subject-level TEF. Views on these benefits included the following:

- TEF was regarded as beneficial as a tool for both staff and student recruitment particularly where TEF gold had been achieved by the institution;
- The TEF awards had helped HEIs to raise their profile and had contributed to enhancing their reputation;
- The TEF award had contributed to internal promotional and marketing opportunities and as such had helped with staff retention and staff satisfaction levels.

In contrast to this, only two references were coded for the pre-1992 provider group. One response expressed the view that TEF gold had enhanced the reputation of the HEI and the other outlined that TEF had provided: *“an opportunity to celebrate the wider institutional work in relation to learning and teaching.”*

**Is TEF Fair?**

There were no differences between pre and post-1992 responses for Question 26 – the overwhelming view being that there were particular types of student, provision or provider that *are* disadvantaged by the current design of TEF in a disproportionate way.

**Table A.60: Are there particular types of student, provision or providers that are disadvantaged by the current design of TEF in a disproportionate way? (Question 26)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Pre-1992 (n=41)	37	90%	0	0%	4	10%
Post-1992 (n=67)	60	90%	5	7%	2	3%
<b>Total (n=108)</b>	<b>97</b>	<b>90%</b>	<b>5</b>	<b>5%</b>	<b>6</b>	<b>6%</b>

*\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.*

The majority view amongst both the pre and post-1992 providers was that there are particular types of student, provision or providers that are advantaged by the current design of TEF in a disproportionate way. This view was held by more post-1992 providers (80% compared with 61% of pre-1992 providers) – Table A.61.

**Table A.61: Are there particular types of student, provision or providers that are advantaged by the current design of TEF in a disproportionate way? (Question 27)\***

Respondent group	Yes		No		Don't know	
	Number	Percent	Number	Percent	Number	Percent
Pre-1992 (n=36)	22	61%	6	17%	8	22%
Post-1992 (n=64)	51	80%	8	13%	5	8%
<b>Total (n=100)</b>	<b>73</b>	<b>73%</b>	<b>14</b>	<b>14%</b>	<b>13</b>	<b>13%</b>

*\*Respondents who did not answer have been excluded. Percentages may not sum to 100% due to rounding.*

With regards to qualitative responses, the proportion of reference codes for the two provider groups (pre and post 1992) were similar for most of the responses to this section, with the exception of two codes:

- A higher proportion of post-1992 providers felt there were disadvantages for providers with high(er) proportions of certain types of student;
- Similarly, a greater proportion of post-1992 providers felt that providers can be disadvantaged by the type of subjects they deliver and the structure of that provision.

#### ***Type of student***

Respondents from post-1992 providers were more likely (than those from pre-1992 providers) to raise disadvantages in relation to having high(er) proportions of certain types of students within their institutions. Having high levels of international students, students from groups who are statistically less likely to gain employment or high paid employment (e.g. disabled students or those from lower socioeconomic backgrounds), and commuter and local students was felt to be a disadvantage for providers.

#### ***Type of subject and structure of provision***

Respondents from post-1992 providers were also more likely (than those from pre-1992 providers) to raise disadvantages in relation to subject areas taught and structure of provision. Post-1992 providers had a higher proportion of references coded to the following disadvantages:

- **Types of subject:** providers delivering subjects that do not typically lead to highly paid jobs (either immediately after graduation or in the longer term) were felt to be disadvantaged by the emphasis on employment and earnings data within the current metrics.
- **Structure of provision:** providers delivering apprenticeships and foundation degrees were not felt to be reflected within the TEF process, particularly in terms of these students not being able to complete the NSS. Providers delivering courses via distance learning and part-time were also felt to be disadvantaged by use of the NSS results – the questions were not felt to reflect the diversity of experiences within higher education (e.g. lack of a physical campus).

#### **Key conclusions**

Overall, the differences between the responses provided by the pre-1992 and the post-1992 provider groups were very small. However, the post-1992 group were more:

- Likely to consider the TEF criteria to be appropriate;
- Positive about the ratings used for TEF;
- Likely to discuss the promotional and marketing opportunities from TEF; and
- Likely to mention that TEF disadvantages HE providers with higher numbers of students in specific groups (e.g. lower socioeconomic groups) and/or subject areas that are less likely to result in high paid employment.

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The pre-1992 group were more likely to express the view that the TEF had resulted in less staff time and resources being available for teaching activities when compared to the post-1992 group.