

Response ID ANON-NHMS-543A-K

Submitted to **Teaching Excellence Framework: Technical Consultation for Year Two**
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Introduction

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What is your organisation?

Organisation:

Bournemouth University

Please select the option below that best describes you as a respondent to this consultation

Organisation type:

Higher Education Institution

Additional details (if required):

Consultation Questions (page 1 of 4)

Q1: Do you agree with the criteria proposed in Figure 4?

Yes

Question 1 further detail:

It is important to note that judgements should be based upon evidence submitted against the criteria, informed by the indicative metrics. Please see our comments in response to question 8 in relation to the role and relevance of the metrics.

As noted in our response to question 7, criteria and evidence may relate to all three categories of 'learning environment', 'student outcomes and learning gain' and 'teaching quality'. Assessors should be able to consider the same evidence in all three categories.

Teaching quality- Bournemouth University broadly agrees with the criteria for teaching quality.

- Figure 4 notes the first criterion as 'Teaching provides effective stimulation and challenge...' but the comments state that "Panel members will be looking for evidence that students report high levels of satisfaction..." These do not align. Panel members should be asked to look for evidence that teaching does provide effective stimulation and challenge, which may include evidence from other sources as well as students. There is a specific NSS question about challenge that should be included in the core metrics.

- In figure 3, "work readiness" is also referred to; this is not followed through into figure 4, and should be included as a separate set of criteria in figure 4 for teaching quality.

- We recommend that industry engagement in course design should be included; employer engagement is currently only mentioned in relation to student outcomes. Engagement may be through professional body accreditation or direct involvement of institutions with employers. This engagement is vital to ensure that programmes that are being taught will give students the skills and knowledge that employers are looking for. We believe that the level of professional body accreditation or recognition is a metric that should be included to give credibility to this set of criteria and the stated ambition in the TEF and the White Paper to support employability. This one of the key proxies for a focus on employability.

- The Course Design criterion refers to evidence that the course "allows for the development of knowledge, skills and attributes at a high level". It is not clear what the "high level" is – in our view this should be linked to the Framework for Higher Education Quality.

- It is odd to refer to grade inflation in a paragraph about course design; if grade inflation is an issue it should be dealt with as a separate quality control process through the OFS if it needs to be addressed, rather than as an issue of teaching quality.

- We do not believe that contact time and class size should be included as measures of teaching quality; these will vary widely according to the subject matter and the method of teaching, and including these explicitly could have a chilling effect on innovation in teaching methods. We appreciate that students do refer to contact hours in surveys about teaching quality but we believe that more research is needed on this before it becomes a key measure.

- We believe that there are other much more relevant metrics that should be included, for example the percentage of staff that are HEA fellows and/or with

teaching qualifications, as well as professional accreditations and professional recognition. We believe that these should become core metrics and that these matters should be explicitly mentioned in the criteria.

- In addition, initial and continuing professional development for teaching and academic support staff should be included in these criteria.

Learning environment- We generally agree with the criteria. However, the list of indicators is very short and restricted, with a focus on resources and on student feedback. We are concerned that this approach may reduce the opportunity for a holistic view of diverse learning environments across an institution. Work readiness is also relevant in this category, as are the steps that the institution takes to ensure an inclusive learning environment.

- Professional body involvement in course design, via professional accreditation or recognition is key in this area and this should be a core metric - this one of the key proxies for a focus on employability.
- We believe that student engagement is a very important measure of this and that a standardised means of measuring this should be developed in order to ensure that this can be compared and measured across the sector. This should be included as a core metric from year 3 onwards.
- We welcome the reference to work placements and work experience but we believe that the proportion of students undertaking placements should be a metric which is specifically included and that should be a core metric – this one of the key proxies for a focus on employability.
- The NSS question asking students whether they believe their degree has improved their career prospects can and should be included in the metrics for this section on learning environment.
- We believe that innovative and diverse learning and teaching strategies should be included, including approaches to inclusive learning.
- In relation to the link between research, professional practice and teaching, while we welcome this we would like to see the reference to research projects replaced with a reference to “involvement in real research” – research experience may be incorporated into programmes or extra or co-curricular experiences in a number of different ways.
- We would like a reference to student participation in practice development for programmes leading to professional registration.
- We would like to see a reference to practical hands on experience, such as laboratory experience, which is also key to many STEM subjects.

Student outcomes and learning gain- Whilst we do not disagree with the criteria listed, the metrics for this category are overwhelmingly focused on employment outcomes. As we have mentioned in our response to section 8, we believe that the metrics merely inform the assessment process and that other evidence will be required to establish that the criteria are met. We suggest including references to learning as an outcome alongside professional outcomes. Learning and the increase of knowledge are important outcomes of a degree although they may not directly lead to employment.

- See our comments in relation to Q2 below about timing and challenges with the DLHE data as it stands. The metrics used to support this section must be developed as new DLHE data becomes available following the review of the survey.
- We believe that it is important for assessors to understand the expectations of students and how these are met, which will give a better understanding of outcomes – this is something which should be developed through the DLHE survey and should be included as a core metric in future versions of the TEF.
- We also believe that it is important to consider whether the course delivers what it was described as delivering in terms of learning outcomes. This may be assessed through the quality assessment process and this is one of the reasons why we believe that the QAA report should be included as key contextual information for the assessors, along with evidence of formal feedback from external examiners and OIA complaints data.
- To measure learning gain, a metric similar to the Guardian's value added score can be used. The Guardian takes the latest available HESA data and gives each full-time student a probability of achieving a 1st or 2:1, based on the qualifications that they enter with. Attainment of good degrees (2:1/1st) reflects how difficult it was to do so. Thus an institution that is adept at taking in students with low(er) entry qualifications, which are generally more difficult to convert into a 1st or 2:1, will score highly in the value-added measure if the number of students getting a 1st or 2:1 exceeds expectations. This measure is available now from HESA data to show learning gain as an outcomes based differentiator. Entry qualifications are already used in the benchmark data so linking such to degree outcomes is a logical next step in terms of value added. This should be included in Year 2 as a core metric.
- It is not clear why salary data (from DLHE) would not be a relevant metric in this context – this could and should be used as a core metric.

Q2: -

Q2a:

We do not believe that this should be included as a separate measure from the DLHE. This is unnecessary duplication and will create confusion.

- There are challenges with the timing of the DLHE survey; these days many graduates do not immediately move into a highly skilled or professional role, in some cases taking time out and in others taking lower skilled roles in their chosen industry first. Including this single measure here provides a distorted view of the real outcomes for students.
- There are challenges with the way that this data is collected, as the questions focus on outdated job titles rather than the actual work that students do.
- It is also unclear why this is of more value than salary data – the same timing issues apply to salaries, but it seems odd to include one and not the other and we consider economic return measured through starting salary a better indicator of the start of a productive, economically successful career as well as providing an indicator of economic contribution to society post-graduation.

If this is included:

- it must also recognise progression to further study as an important outcome.
- it will be important to clarify its relative weighting compared to DLHE and the other data. It should be considered as supporting rather than a core metric given the issues referred to above.

Not sure

No

Question 2 further detail:

SOC is under review by ONS but our view it will always be out of date and also the data will not be accurate unless the questions are asked in a different way ("what do you do in your work") rather than being based on job descriptions. This area is also being considered in the HESA DLHE review at the moment and we do not believe that this is a helpful measure for the TEF in isolation from wider outcomes data as contemplated by the DLHE consultation.

This data relates to employment – those who have not sought employment should not be included in the denominator.

As we note in response to question 12 it is important that the information provided to students via the TEF is consistent and comparable; using slightly different methods to analyse and present similar data used in other reports will lead to mixed messages and mean that students will have less confidence in the data. The UKPI is understood and the same approach should be used here.

Q3: -

Yes

No

Question 3 further detail:

3b- We broadly agree with the proposed approach for using benchmarks, however we believe that this should be done on the same basis as for the existing UK PIs. As we note in response to question 12 it is important that the information provided to students and other third parties via the TEF is consistent and comparable; using slightly different methods to analyse and present similar data will lead to mixed messages and mean that students will have less confidence in the data.

A different approach will be confusing and we do not believe that it is helpful to use a statistical process to highlight differences; if the metrics do not show sufficient differentiation then different metrics should be developed. A known proportion of providers will always fall outside this range and hence this is forced differentiation rather than actual differentiation. Furthermore, it takes no account of absolute value, so if the whole sector dropped, say, 10% or even 5% across the board that would not statistically flag as any worse in this metric set. In our view, the thinking on metrics is not yet sufficiently mature to use the suggested method.

We do not agree that all graduates should be included; this will distort the outcomes and again will be inconsistent and confusing.

We do not believe that different factors should be reported with different filters – all the filters should be applied to all the data. We understand that the Office for Students will be looking at, for example, non-continuation data split by ethnicity and sex, for the purposes of assessing fair access and participation and this information should also be included in the TEF.

Further evidence to differentiate providers can and should be taken from the most recent set of QAA reviews which are used as a benchmark for Year 1. In 2013/14, 27% of 62 providers received an unsatisfactory judgement contra to opinion that such judgements have not been given (<http://www.qaa.ac.uk/en/Publications/Documents/Findings-From-HER-2014-15.pdf>).

Furthermore, the BIS impact assessment on the HE & Research Bill notes the following risk factors -- including quality:

o HEIs – 5% financial, 2% quality, 3% overall risk

Forcing more alleged variability than the above 2% (see comment 31 below) undermines the position already taken publicly by BIS in proposing the Bill, especially when considered against the risks noted for alternative providers:

o APs – 20% financial, 11% quality, 16% overall risk

We also note generally, and specifically in relation to this question, that the use of different metrics and statistical methods will increase bureaucracy for institutions, not reduce it – although reducing bureaucracy is one of the stated aims of the framework.

Consultation Questions (page 2 of 4)

Q4: Do you agree that TEF metrics should be averaged over the most recent three years of available data?

Yes

Question 4 further detail:

We believe that this is appropriate, and that the separate benchmarking for each year will show a trajectory, which is important.

Q5: Do you agree the metrics should be split by the characteristics proposed?

Yes

Q5 further detail:

We agree with the characteristics proposed but we believe that gender should also be included. There should be a mechanism to highlight small population sizes should be highlighted as the data may not be representative. Please also note our response to question 6 where we highlight that where similar information is used and reported for a number of different purposes it should be done consistently to avoid confusion.

Q6: Do you agree with the contextual information that will be used to support TEF assessments proposed?

Yes

Question 6 further detail:

We agree with what is proposed and we support the use of data maps.

Concerning the data maps, we are not sure why it will track where students studying at the university grew up. We question whether this is relevant (and it may also be unclear if it is measured at a single point); we believe it would be more useful to establish where they went to school or college prior to university- more clarification on this would we welcome.

We also wonder how this will link to the Fair Access Agreement and the assessment and reporting process under the new arrangements. It is important that any data used is consistent to avoid unnecessary bureaucracy and confusion. This is particularly important because institutions will be required to provide separate information to the Office for Students for publication alongside this information. The data, and the statistical processes used to measure and report on it, should be consistent across all these different processes.

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Q7: -

Yes

Yes

Question 7 further detail:

Bournemouth University generally agrees with the proposed approach for the provider submission.

In terms of structuring the provider submission, it is important that institutions are able to write freely throughout the 15 pages and build up a case that is suitable for their individual institution, rather than providing supporting information that is forced into pre-defined boxes or sub headings. Information that is provided may relate all three categories of 'learning environment' 'student outcomes and learning gain' and 'teaching quality', and this would allow the evidence to be appropriately presented. However, we recognise that it is important to have some element of comparability for the assessors, and so some structure and guidance would be appreciated.

We believe that in addition to the submission, the data and the contextual information, the assessors should also have access to the QAA report. This will include valuable conclusions and information that should be taken into account in the assessment, and the provider should not be required to repeat that in the 15-page submission.

Q8: Without the list becoming exhaustive or prescriptive, we are keen to ensure that the examples of additional evidence included in Figure 6 reflect a diversity of approaches to delivery. Do you agree with the examples?

Not sure

Question 8 further detail:

It is important to note that judgements should be based upon evidence submitted against the criteria, informed by the indicative metrics. We note the following statements:

- in para 19 of the consultation "Assessment will be made against a set of common criteria, covering different aspects of teaching and learning. Assessment will be holistic, based on both core metrics and additional evidence..." and
- in para 34 of the consultation "[The criteria] have been designed to allow assessors to make a clear judgement based on core metrics and additional evidence put forward by a provider ..."

These statements appear to reverse the focus of the assessment away from a holistic approach based on all the evidence (including the metrics) to an approach which will use the metrics first and the other evidence will be used simply to qualify the metrics. We do not believe that this is helpful, particularly in the early years of the TEF when the metrics are proxies, and very limited proxies, for many of the criteria. There are known problems with some of those metrics (e.g. concern about the use of NSS as a proxy for teaching quality was raised across the sector in the responses to the Green Paper.

Bournemouth University agrees with the examples on the list but we believe that they are too narrow.

- In particular, we would suggest the Learning Environment list is relatively restrictive compared to the other elements and argue this list needs to be broadened to better reflect the importance of learning environment for teaching, to refer to professional recognition or accreditations, the proportion of students undertaking placements and the outcome of the NSS question asking students whether they believe their degree has have improved their career prospects.
- The list seems to be based on an understanding of more traditional courses and may not reflect the diversity of new disciplines and creative courses.
- Innovation is a very broad term and in terms of teaching quality, innovative approaches could include a variety of aspects, which aren't necessarily addressed in

this list. Please see our response to question 1.

- References to employers should be widened to make it clear that the views of the third sector, as “employers” of those undertaking voluntary work are also relevant. Voluntary work may be a first step towards a career or may be part of a portfolio career.
- It is also important to recognise that students may become entrepreneurs, initially sometimes in an informal way setting up small unincorporated ventures or as sole traders.

Q9: -

Yes

No

Question 9 further detail:

Bournemouth University supports the use of commendations; however, we do not believe that there should be a set list of restricted categories. Panels should be able to award commendations where appropriate to reflect excellence. We do not believe that there should be any quota attached to these, as this would undermine the value of the commendation. We also believe that commendations should be available to assessors to award alongside all levels of TEF - an institution might receive an overall “meets expectations” rating but be commended for one aspect of its performance which is outstanding, for example.

Consultation Questions (page 4 of 4)

Q10: Do you agree with the assessment process proposed?

Yes

Question 10 further detail:

We agree with the assessment process and in particular, we are pleased to see that the TEF will be looking for teaching and learning experts to carry out the assessment.

In terms of process:

- We would welcome clarification on how the moderation process will work; to ensure that assessments are consistent.
- Notwithstanding the time restrictions, we believe that there should be a right of appeal; failing this, we believe that there should be a process allowing providers to query and clarify their initial assessment following the provider submission— this is particularly important in the first few years of the TEF as metrics are developed and the assessment process is refined, to avoid unintended consequences. We understand that there is an opportunity for the panel to raise queries with the institution; we are in addition suggesting that an institution should be informed of its provisional rating and the reasons why and given an opportunity to comment before publication as an alternative to a formal appeal.
- It is crucial that outcomes are released at the same time across the sector to ensure fairness.
- We also believe that it is important that the submissions are published and that decisions are given.

We would welcome clarification of the role of the provider submission:

- The submission should be taken into account in all submissions. We believe it should be the primary evidence against the criteria, informed by the metrics, as noted in our response to question 8.
- We also believe that the provider submission will be particularly important in the context of the limited metrics available in year 2, and the known problems with some of those metrics (e.g. concern about the use of NSS as a proxy for teaching quality was raised across the sector in the responses to the Green Paper).

Q11: Do you agree that in the case of providers with less than three years of core metrics, the duration of the award should reflect the number of years of core metrics available?

Yes

Question 11 further detail:

New providers should only have their award for the number of years they have existed, therefore new providers, who have existed for one year should not have an award that lasts more than one year. This will be simple to understand for students and ensure that the outcomes are not distorted for new providers.

Q12: Do you agree with the descriptions of the different TEF award ratings proposed in Figure 9?

No

Question 12 further detail:

Bournemouth University does not agree with the descriptions of the different TEF ratings. The ratings are not defined and are circular (excellent means excellent) and therefore it would be very difficult for anyone, including students, to determine what each of the ratings means and how institutions differ from one another, based on these current descriptions.

We are extremely concerned about the international reputation of the sector; and we believe that a “meeting expectations” rating is problematic. It does not suggest quality or excellence, and if this is coupled with a distribution pattern in which only a few institutions are in this category it will imply poor performance.

If it is the intention to suggest poor performance, we have real concerns about the implications for those institutions. We also query why it would be appropriate to use this level for all institutions in the first year. We understand that it is the intention of the TEF to recognise teaching excellence; however we do not believe that it should be a tool to manage the performance of universities – poor performance should be managed by the Office for Students using its quality framework under

its risk-based approach. In our view, genuinely failing institutions should not be permitted to enter the TEF, or if they enter, should not be awarded any rating at all. To do otherwise undermines the quality regime in the UK. As we have noted in response to question 3, there are already institutions which struggle to meet expectations and these can already be differentiated through the QAA review process.

We would therefore prefer to replace “meets expectations” with “good”. It is important to differentiate between excellent and outstanding, and if there is no real difference, we would combine these two categories. The use of commendations may be sufficient to ensure that outstanding examples can be identified.

Alternatively, we propose using a simple star or numeric rating that does not have the same negative connotations.

We believe that market research and testing is required with students, employers and international audiences to ensure that the ratings system will be valuable and meaningful and not damaging to the reputation of the UK higher education sector both at home and with overseas student applicants and with overseas academic partners.

Although the TEF rating itself will be a single rating, the information that supports it, including the metrics, the contextual information, the benchmarks and the submissions will all be publicly available, alongside data published by the Office for Students, the KIS and Unistats data and the quality assessment outcomes. We are concerned, as noted above, that if this data is measured and analysed inconsistently, then different bodies will come to different conclusions based on the same underlying data. This will be confusing for students and unhelpful to employers or the sector. We believe that where existing metrics and data is used, it should be used consistently. A different interpretation may be applied, though the assessment process, which will be reflected in the overall TEF rating, the commendations and the comments of the assessors, but the data and analytical processes used should be consistent. If these existing systems are not adequate, then we propose that either they should be changed for all purposes or new metrics developed.

This is particularly the case, as noted above, for outcomes data collected via DLHE and for data related to fair access and participation. We therefore recommend that where existing or similar data is used it should be prepared on the same basis as the existing data.