

**GuildHE responds to:**  
Subject TEF consultation  
May 2018

Distinction and Diversity  
in Higher Education

**GuildHE**

# GuildHE Subject TEF response

## May 2018

### 1. To define 'subjects' in subject-level TEF, do you:

#### **a) agree with using level 2 of the Common Aggregation Hierarchy as the classification system (CAH2, with 35 subjects), and if not, what other systems could be used and why?**

GuildHE is an officially recognised representative body for UK Higher Education. Our members include universities, university colleges, further education colleges and specialist institutions from both the traditional and private ("for profit" and "not for profit") sectors. Member institutions include some major providers in professional subject areas including art, design and media, music and the performing arts; agriculture and food; education; maritime; health and sports and many will have small student cohorts.

We agree with using level 2 of the Common Aggregation Hierarchy, as this ensures that the process aligns to both the OfS approach to data analysis, and is linked to how information is published to prospective students whilst giving a reasonable level of granularity to the data.

#### **b) think that specific changes or tweaks need to be made to the definition of the 35 subjects in CAH2, or to the 7 subject groups used in Model B, and if so, please explain why?**

GuildHE believes that the 35 subject definitions broadly work. However, as the consultation itself acknowledges 'providers define their own subjects and we recognise that no single system will be perfect for every institution and for every student.' There are some subjects where they don't quite fit into the groupings. For example, many of our specialist arts institutions offer Architecture courses. In the current groupings, this programme would be considered an outlier as it sits in a different CAH code. Being able to be a little flexible in porting 1 or two courses into the provider's 'main' subject pot would reduce the burden. Architecture, building and planning could also sit happily in the Engineering and Technology subject group as an aligned discipline.

Our members have also raised concerns around groupings such as sport and exercise sciences, economics, politics and law which have more specific course-related definitions. For example, there are five defined areas of psychology feeding into the CAH2 Psychology group, giving an increased opportunity to aggregate sufficient valid metrics. Sport and exercise sciences, however, have only one defined group (i.e. sport and exercise sciences).

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

No, we disagree that it should have a substantially longer duration as the 6-year model proposes. The fundamental principle of the policy is to give students accurate information so that they make informed choices and to encourage provider enhancement. Therefore, there is a concern that the data in the cycles will not be accurate for students if it is more than three/4 years old, and does not incentivise providers to improve their data. Also, given the transient nature of the student body, and the rapid nature at which providers change, it is not good for competition to allow providers with historically good metrics to continue to have a gold award if their newer metrics would mean a drop in their status. Lengthening the duration also puts the policy at risk of attack from the media and other sources, especially as much of the data used in the methodology is already publicly available. It wouldn't take much for a researcher to calculate a current Gold institution should now be bronze (or indeed be a cause for concern at OfS) for the credibility of the award to be tarnished.

Historically under QAA review, providers were reviewed every 5 years. The methodology allowed review teams to examine both the current and likely future health of the provider. This TEF

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methodology is looking only at historical data, and this can't necessarily predict future quality with confidence.

We thank the TEF team for recognising the burden this methodology has on providers and TEF panels. However, the proposed solution damages the public confidence in the awards. Unistats research suggests that students and parents want up to date information as this is what they perceive to be reliable. Using 6/7-year-old data to calculate the quality of a provider goes against this principle.

We understand the ultimate policy goal is for the Subject TEF methodology to overtake the current provider TEF methodology. We believe at present running both types of approach simultaneously is adding to the burden and worry about how manageable this process is. Once Subject TEF becomes the one single methodology there will be no 3-year provider level awards anymore to legitimise how current the awards are.

We do not support Option 2 of a 6-year award, but on balance could live with Option 1 of a 5-year award. The benefits of having an annual window for submission will also be that as time passes providers will stagger their re-submissions, meaning less administrative work for panels or OfS officials.

In the next iteration of the TEF Subject pilots, we would like to see the OfS/DfE undertake modelling based on historic data of providers to see what impact this could have in the confidence of the awards.

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

We believe that most of the metrics are relevant to assessing subject level TEF. Our members have requested further clarity in how they are weighted, and how familiar assessors are with the complexities of the data, especially the complexities of weighting against both the provider level data and the sector-wide subject benchmarks. This is especially challenging in a specialist single subject institution, where their provider level benchmarks are not related to the sector-wide subject benchmarks.

Concerns were also raised around how the supplementary metrics will affect results, particularly in relation to graduate outcomes, especially LEO. Research has indicated that graduate outcomes hinge on many external factors outside of provider control - such as class, the graduate earnings of parents, ethnicity, gender and location. The LEO methodology is fundamentally flawed and does not indicate at all what the quality of teaching is like for an individual subject at one specific provider. Institutions can show you in other ways how they prepare students for employment and could be linked to their career trajectory over a five year period. Reviewing a provider in relation to the start of a graduate's journey is very problematic, and looking specifically at earnings for the purpose of quality 'assuring' education institutions is a nonsense.

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

- **A 'by exception' approach (i.e. a form of Model A), or**
- **A 'bottom up' approach (i.e. a form of Model B), or**
- **An alternative approach (please specify)?**

GuildHE believes that both of the of the current models present significant challenges. We consider Model B to genuinely fulfil the government's objective of assessing subject-level teaching quality which is fair to both providers and to the public. However, this requires a higher level of burden for providers. We continue to reiterate that the cost of the exercise to the taxpayer

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and providers should not outweigh the benefits of the policy. In our opinion Model B fulfils the policy objective, but is very onerous, whereas Model A is more manageable for providers but does not create robust conclusions to meet the policy objective. There may be a third methodology based on the principles of Model B which retains the robust methodology but decreases the cost.

Model A is problematic using a 'by exception rule' as the Institutional TEF process showed that being reviewed by a panel as well as the 'raw data' did make a difference to the final judgement. A by exception approach could hide a number of courses who are on the boundaries between two awards, and being allowed to submit some additional courses would only uplift a providers top performers whilst shielding the coasters. It is also unclear how comparing a subject with the institutional average would provide meaningful data to students. Students comparing specific subject TEF results for multiple providers would be looking at awards which were calculated using different data and are therefore are not comparable. Specialist providers are also disadvantaged in the Model A methodology but not being reviewed by subject specialists.

Whilst we believe that the Model B methodology meets the needs of the policy intention, it is at present very demanding on providers. One remedy could be to allow providers to submit 1 of their 7 subjects on a rolling basis rather than making providers submit everything at once. This would spread the workload for Registrars, Deans, Quality Managers and Learning and Teaching Leads. If a provider submits 1 or more subjects in a year, their institutional TEF score would be reviewed as per the current arrangement or could be reviewed every other year.

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

##### **a) the initial hypothesis rule for generating exceptions from the metrics?**

In principle we recognise how Model A could work to minimise burden on providers, however, we have a number of methodological concerns about the robustness of the awards, namely the consequences of the sample size of classes with small cohorts, how single subject providers are treated, and how a subject average relates to the institution's whole data. Fundamentally though, it seems illogical to compare individual subjects to an institutional average in order to calculate quality. The overall institutional data is not significant when looking at subjects as a whole sector. Each subject has different trends and patterns, and whilst they help contribute to the provider average, courses significantly range in size which skews the provider level data. You could have a subject which has a double positive flag based on their provider's response, but when compared to other subjects at different institutions may fall foul of the average. It is still unclear in Model A as to whether subject benchmark data will also be used to flag provider's exceptions. It is important that a Model A approach does not suppress positive and under-performing courses in the context of national trends which fall just under the absolute high and low star and exclamation marks.

Single subject providers under Model A are at a disadvantage by not allowing their programmes to be reviewed by a subject specialist panel. Specialist institutions build their culture and identity around their discipline, and it affects the operation of the whole institution. We believe the institutional panels are both less likely to understand the different operating structures and practices of a specialist institution, or be able to recognise innovation if it is reviewed outside of the subject specialists. It also will treat subject specialisms in multi-disciplinary institutions differently to providers who are wholly specialist which is unfair.

##### **b) allowing providers to select a small number of additional subjects?**

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Because providers come in all shapes and sizes we believe the number of additional subjects should relate to the size and scope of the institution. However, there should be a minimum for all providers of 2 subjects.

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

Yes, if the exceptions produce a significantly different result.

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

Yes, there is an easily understandable logic to calculating the overall provider score in this methodology.

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

GuildHE believes that there is currently not enough research into the reasons behind grade inflation, and therefore we would have major concerns about it being used as a metric (even at provider level) at this time. The reasons behind grade inflation are complex and range from provider to provider, so this could lead to some institutions being unfairly penalised.

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

The consultation states that the department intends to let the distribution vary across subject area. GuildHE do not agree with enforcing any distribution onto the metrics, owing to the prevalence of clustered metrics and absolute high and low values within subject levels. Under Model B a natural distribution across different subject groups will occur as Panels will be able to see their subject performance in the round. If more was made of the subject benchmark data as opposed to comparing subject performance to the institution's average data, then much of the government's concerns about distribution would be mitigated.

### **10. To address the issue of non-reportable metrics: a) do you agree with the proposed approach?**

We believe that the TEF should use the same methodology which is currently used for the purposes of Unistats. This aggregation method has had full sector consultation and backing from all different types of providers. As the representative body for providers who will be far more likely to have non-reportable metrics we have been working hard with HEFCE over the last 5 years to ensure that small cohorts are not seen as a negative for the purposes of public information, or for analytical purposes.

Under the current aggregation methodology, Unistats first adds an additional year of data to the dataset in order to see if this enables the data to meet the threshold. If the data still doesn't, then the data is aggregated up to the next subject level. In this process there are very few unreportable courses. We believe this is the fairest way to allow as many courses as possible to participate in the TEF.

The implications for a subject not being able to receive a TEF score should not be underestimated. The Unistats research indicated that parents and prospective students were wary of courses which could not report data and thought the quality of these courses must have been lower than those with

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reportable data. We don't know the full impact of how TEF data may be used by third party providers in advising student choice. If for example, UCAS decided to allow users to search subjects by their TEF rating, this would significantly disadvantage those providers who offer good quality (often world-leading), but small courses.

**b) when assessment occurs, do you prefer that assessors:**

- **rely on group metrics alongside any reportable subject-level metrics?**
- **rely on provider metrics alongside any reportable subject-level metrics?**
- **follow an alternative approach (please specify)?**

For all the reasons above we would hope that the methodology uses a group-based approach. We would also advocate providers being able to move small courses into other subject groups with legitimate similarities. For example, Architecture could sit in either Art or Engineering, Law could move to the social sciences, and medical and health sciences courses could be ported to the natural sciences.

#### **11. Do you:**

**a) agree that QAA Subject Benchmark Statements and PSRB accreditation or recognition should remain as a voluntary declaration, and if not, why?**

We agree that this should remain as a voluntary declaration, as although they are a useful tool, they are relatively broad, and don't always account for the specifics of a particular course. They are also not always a marker for quality or added value for the student.

**b) think that there are any subjects where mandatory declaration should apply?**

No. There are other parts of the public information landscape that inform students of the professional status of the course they are applying to.

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

Yes.

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

GuildHE institutions offer a highly personalised learning experience often with high numbers of contact hours, small class sizes and taught by well-qualified individuals. However, we believe all of the proposed ways to measure teaching intensity fall short of providing students with genuinely useful information or enable a panel to judge the quality of the teaching provision. For example, our members have high levels of industry professionals teaching their courses. This provides an enriching experience, but under the methodologies proposed, providers would be penalised for having contract staff and those with no formal teaching qualifications. It is also problematic to calculate the number of contact hours for courses which ask students to spend a lot of time in studios and labs developing their craft.

Furthermore, a calculation of staff-student ratio does not adequately reflect what good quality teaching is (a 500 student lecture can be as transformational as a 1-1 session) and it is crucial



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that students are offered a variety of ways to learn to suit different learning types. We also do not believe that a survey of students is a reliable way of collecting information about contact hours and teaching provision. Surveys measure perceptions of an experience, and responses are highly personalised. Factual information can be more easily collected from provider Programme Specification and Validation Documentation.

When thinking about the cost of HE and student perceptions of value for money it is important to recognise that students are not just paying for contact hours. Independent study, student support services, and facilities also directly contribute to students' abilities to learn effectively as well as guided information and support directly from subject specialist tutors and technicians. It is therefore unhelpful to calculate teaching intensity as a measure of quality for the student learning environment.

We believe measuring teaching in any of the proposed ways will have a dramatic negative impact on the sector. It will stifle innovation because institutions will have to conform to government definitions of teaching activities, rather than providing the right learning environment for their students; not to mention that quality does not relate to quantity.

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

Although GuildHE strongly opposes any measure of teaching intensity - if one were to be used it is critical that it considers all areas of a course where students are able to learn. This could be typical learning environments, such as lectures, seminars, tutorials, labs, workshops, studio hours - but also could be through work experience placements, off-site visits, exhibitions, masterclasses and moots.

It is also really important that independent study is not discounted in a measure of teaching intensity. The sector has a duty to provide people with the skills they need for future work: such as the ability to meet deadlines and to develop work without supervision. Therefore, discounting it in a proxy for teaching intensity could risk course leaders cutting capacity for independent work.

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

We are strongly opposed to asking students questions around teaching intensity, because intensity is subjective, and their viewpoint may not reflect the reality, or be measured against their previous education experiences.

We also do not consider 'qualified to teach' to be an effective method of assessing teaching intensity. This is because we believe this is a loaded term, and doesn't necessarily indicate teaching quality. Many of our providers recruit teachers from their chosen profession - which students value more highly than whether or not they have a formal qualification. It also undervalues younger or more junior staff.

Our members represent a distinctive part of UK HE where there is a strong emphasis on professional and technical education, all of which is delivered using a number of 'non-traditional teaching' methods. Our creative art students work regularly with real employers as a fundamental part of their assessments, and spend many hours honing their creative skills in the studio; we offer apprenticeships in a variety of areas, our musicians get to learn for the best in the industry through masterclasses and showcases, and our agricultural students get real world experience of working with animals and equipment to name a few. We are concerned that all of these approaches to teaching cannot be captured by a metric, and can be better articulated to the TEF panel as part of a provider's submission.

**16. Do you have any other comments on the design of subject-level TEF that are not captured in your response to the preceding questions in this consultation?**

GuildHE feels it is important to stress the current challenge the two methods put forward. While Model A is preferable to providers, a bottom-up approach is more in line with the mission of the policy and has a more robust methodology.

We feel that the approach to student involvement in the TEF process needs to be strengthened. The changes made to the way student feedback is used in the hypothesis means that students have less voice in how their institution is viewed. We continue to advocate that students should be allowed to submit a ½ page submission to the TEF Panels in order to provide further contextual information about what it is like to be a student at that institution. This practice has been hugely successful in QAA reviews for 10 years, and we hope that the TEF methodology allows students a greater voice in how their provision is viewed.

We also would like to take this opportunity to reiterate our concerns over the use of LEO data in the methodology. Even with the inclusion of self-employed earning the data is fundamentally flawed in a number of ways and academic research has shown that salary has very little to do with the programme of study or a specific institution but is hugely dependent on the demographic markers of the individual student. The LEO data also does not account for regional salary variances, or that universities have no influence over public and private sector pay scales.