



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

GuildHE members are proud to put teaching at the heart of their offer to students and are pleased to be recognised for providing a high quality learning experience through TEF. But the cost and burden of the exercise must not outweigh the benefits. That is the risk with the move to subject level TEF.

TEF can help support enhancement in light of the move to risk based, data-driven regulation as it allows benchmarking and the sharing of practice. It also allows providers to be judged on the difference a university makes to a student's progress, not just rewarding universities for taking students with high A-level results in the first place as league tables often do. It also allows our smaller members who aren't featured in league tables to be included as equals. To date the results shake-up many traditional perceptions of "good universities" and excellent student experiences, which have relied too heavily on evaluating research performance.

We don't think TEF supports providers to better meet the needs of employers, business, industry and the professions. Our members have a rich history of offering industry focused (and often industry taught) higher education before the TEF was imagined. We don't see how this exercise supports better collaboration between education and employment, other than to judge providers on student's employment outcomes: a flawed premise because much of the academic research points more towards a students' social background as the primary marker for future success.

11. These purposes fall into two main areas:

1. providing information,
2. and enhancing the provision of higher education.

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

- Providing information
- Enhancing provision
- Both are equally important
- Neither are important

b. Please outline below the reasons for your answers

The ways students make choices about what and where to study are complicated. Those with more capital are better able to navigate the current plethora of information (from KIS to league tables), and use their family, friends and peers to make sense of the data and



choices available. League tables are inherently biased towards large research-intensive universities, so the TEF could be seen as an important unbiased measure of all providers. There are challenges with making the TEF exercise fair and cost effective but we believe it does help level the playing field by highlighting excellence wherever it is found. But the exercise is extremely burdensome for smaller providers, especially subject TEF. Smaller specialist institutions that piloted subject level TEF found the extra burden did not aid teaching improvement. Conceptually, it acts as a strong disincentive to introduce new courses in case they were “bronze” as they might well be as they were initially developed. There is already ample data to support student choice so it shouldn’t be a priority for TEF.

When TEF was first imagined HE operated in a very different regulatory climate. There was more collaboration, more peer-led review activities, and more regular ‘health checks’ for providers in the cyclical quality review process. Now, in an age of risk-based, metric driven, baseline only regulation, TEF provides an opportunity to share practice through the institutional narrative. Without TEF there is no systematic way for providers to explain their metrics and highlight areas of good practice.

12. Should there be any other purposes for TEF?

No. TEF is already a bit of a “Christmas tree” and policy makers shouldn’t try and hang any more things on it. The balance of ‘keeping it simple’ and ‘making sure it recognises complex reality’ is already difficult enough.

The cost of the exercise to the taxpayer and providers should not outweigh the benefits of the policy. At present both Institutional TEF and Subject TEF has been reported by the OfS and providers as needing considerable resources to undertake the activity.

We especially believe that subject level TEF is complicated and extremely time consuming for providers to deliver and will add only marginally to improving student choice. For smaller institutions in particular, small numbers of students can make subject level data unreportable or unreliable (the problem of the science of small numbers). We don’t think any additional purposes of TEF should be delivered through a subject level process.

13. Are the criteria used in TEF (see Figure 1 for a list of the criteria) appropriate? If not, what criteria would be more appropriate?

We think the criteria are broadly right, though we believe if it is a true exercise in evaluating teaching quality, more emphasis should be placed on how the provider delivers teaching, and the academic outcomes of the student rather than the employment outcomes of the graduate where there is no real evidence that the academic environment makes a tangible difference to graduate employment prospects. This does not mean measuring contact hours and other data driven proxies, but through a more considered approach to evidence from

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providers that shows the ethos and results of teaching that are more context specific (this could be provided in the institutional submission). This includes more effective (and flexible) ways to measure the learning gains of students. This is an element which has been largely forgotten in the narrative of TEF but is something that many of our institutions (and others who are WP focused) deliver in spades. We believe distance travelled is more important than graduate employment in measuring the impact of teaching practices at individual providers.

14. There is no direct measurement of teaching quality currently available. As a result, the TEF uses existing data as indirect measures of teaching quality. These measures are known as “proxies”.

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

No

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

More emphasis should be placed on the learning environment for students, and the TEF should not solely rely on statistical metrics as proxies for quality. The institutional submission should be a more balanced document that both explains the core statistics of the institution and allows an explanation of the exact pedagogical approach, how their facilities genuinely support student learning, and how this influences student outcomes.

Data from the new Graduate Outcomes survey could help contextualise student outcomes. Graduates take away far more than a formal qualification from their time at university. Transferable skills, personal development and social networks all form part of the university experience. Rather than just measuring salary and ‘highly skilled’ job marker, we should be aiming to find out to what extent university has had a positive impact on graduates’ lives more broadly. This is especially important for those students who go into industries that take several years after graduation to work up to higher paid and higher prestige roles (such as in the creative industries and those setting up their own businesses).

Where appropriate, we would also like TEF panels to understand better the extent to which the degree content is being directly used in the graduates chosen profession, as for many subjects this can be an important indicator of the extent to which teaching has impacted on the graduate’s employment outcomes.

15. 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 (see that ‘What is TEF?’ section for detail).



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

Yes. There is ample evidence to show that a student's background and prior academic achievements have a substantial bearing on their future success both at university and beyond. Providers who recruit more affluent students are at present at a significant advantage when it comes to graduate outcomes metrics. This should be taken into account during the flagging process.

b. Does TEF benchmark for the right factors?

We think more could be done to benchmark for disability. Our members educate a significant number of disabled students (mainly with Specific Learning Difficulties such as Dyslexia) and in some providers this equates to more than half of their students. Whilst we take every reasonable adjustment to ensure these students are able to thrive in our learning communities, we know that it is more challenging for disabled graduates to find employment and to move as quickly up the promotion ladder. There is very little nationally collected data on the impact SpLDs have on graduates future earning potential and the types of employment they gain, but it is plausible that just as it impacts academic study, it does impact on employment outcomes. We would like to see TEF better measure the outcomes of disabled students with both a physical and learning disabilities outside of just the NSS metrics.

16. The TEF process uses both quantitative evidence (for example, the core metrics) and qualitative evidence (for example, the written submission).

a. What are your views about the balance of quantitative and qualitative evidence considered in arriving at ratings?

As noted previously, we believe that not all things can be measured with statistics alone and more could be done to use the institutional submission as core evidence gathering, rather than a document which just aims to justify the metrics. We know how powerful the institutional narrative can be in changing the ratings of providers which is why we would like to see more discursive evidence collected through the Institutional Submissions. This could be through asking a few common questions to be addressed in the submission which provide more specific non data-driven, but comparable evidence to the TEF panels.

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

Student involvement in the TEF needs to be strengthened. The changes to the way student feedback is used in the hypothesis means that students have less voice in how their institution is judged. Students should be allowed to submit between 1-5 page submission to the TEF

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Panels directly in order to provide further contextual information. This practice has been successful in QAA reviews for over 10 years.

We remain concerned with the way metrics around 'highly skilled' employment and salary are used. We recently published a report with [London Economics on the inadequacies of LEO](#) in measuring 'good' student outcomes. LEO leaves out factors that have a significant influence on earnings and employment, such as many personal and family details and details about where you are working in the UK and in what industry. It also only covers graduates' earnings and employment in the early stages of their careers; and has incomplete data on earnings from self-employment. These critical gaps in the data particularly impact on graduates in agriculture, the creative arts and those who work in rural/coastal or northern regions with very different average salaries, or who work in niche industries. Not to mention it specifically penalises providers who encourage entrepreneurship and self-employment as defined outcome of their degree, which is becoming more popular. Universities cannot control local economies, the public or the private sector rates of pay. We can prepare our graduates for meaningful employment, but there are many other factors that contribute to their future success.

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

- a. awarding a single rating?**
- b. with three levels of differentiation, plus a fourth rating for those unable to be assessed?**
- c. ratings named Gold, Silver, Bronze and Provisional?**

Please explain your answers.

There is no point to TEF if it only provides one rating. We have a quality assurance process already in place in the UK - and there would be no value to replicating a single awards scheme above that. We think 3 ratings (and a rating for those who cannot yet be assessed) is a good option, and mimics other systems of awards in and outside of education. We think Gold, Silver and Bronze is too simplistic and we don't feel the public have grasped that all providers regardless of TEF rating have met the very high standards of UK quality already. This is especially true for observers and potential students from outside of the UK. We would much prefer more descriptive awards like OFSTED of Good, (Very good) and Outstanding as we feel these better articulate providers results against the baseline quality requirements.

We also think it is important for those new providers or those with not enough data to be able to be seen to get some sort of award. We know from the HEFCE KIS research that providers with little or no data are seen as poor quality just for not having enough data, when in reality this could not be further from the truth. Many world leading providers and courses struggle to meet the data threshold requirements because their cohorts are so small.

18. If you answered no, what alternatives you would suggest:



a. For provider-level TEF?

Good, Very Good and Outstanding

b. For subject-level TEF?

Good, Very Good and Outstanding

c. If your previous response(s) reflected on the impact of the TEF on the international reputation of institutions and/or the UK as a whole, we would welcome any evidence or information you can provide that might support your view or help inform the independent review.

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

If yes, how?

We think it is too early to say what positive impacts TEF has made. For some providers who maybe more research focused, this exercise could be useful in ensuring teaching is taken seriously - but as our members have a long history in investing and championing good teaching practices it has yet to make a substantial difference.

It has had a positive impact on smaller providers, who routinely do not have access to Benchmarked national data sets. This has helped them in informing reflective discussion and enhancement activities.

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

If yes, how?

Having a predominantly data driven exercise will undoubtedly change some providers delivery models, and not always in a positive way. We have heard that there are some providers in the sector that may think about changing the type of students they recruit, or change their course portfolio to have better odds at a higher rating. We would see this as a negative consequence of TEF.

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

If yes, how?

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

If yes, how?

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

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

a. Provider-level TEF?

For smaller providers the largest costs relates to central data analysis and the writing of the institutional submission which is usually undertaken by one or a very small team of staff. Our members have very small registry and quality teams (often just one person), and very few have staff in a policy, planning or data analytics role. TEF has therefore taken away significant resources in the day to day running of the provider.

b. Subject-level TEF?

Again, our institutions are small, with no resource to support this sort of activity before TEF came into being. Teaching teams in smaller institutions have far more responsibilities than those in large universities (such as undertaking outreach activities, interviewing and running the admissions processes, and many also still work directly in industry). Subject TEF brings an added layer of burden to an already stretched institution for administrative resources. Not to mention that our courses are small and highly specialised so the data is more complicated. Our specialist members also often have 1 or more small outlier courses (usually architecture) so there is an additional burden to that specific teaching team. Smaller, specialist institutions involved in subject level pilots found the extra burden did not aid teaching improvement: it was an extra hurdle to no extra benefit.

Our members also think that the subject areas are too broad for meaningful judgements to be made, especially in the creative disciplines where there is one code, but hundreds of different types of creative subjects, from crafting objects and fine art - to music and performance which have very different pedagogies.

At subject level, we think the cost and burden of the exercise outweighs the benefits of the policy.

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



a. Provider-level TEF?

The largest benefits we see from TEF is that it highlights to the public where excellence is truly found, rather than preconceived notions of prestige - usually based on research outputs rather than a good student experience. We also think that it has been a useful exercise in providers having a better understanding of students with different characteristics and backgrounds.

b. Subject-level TEF?

Subject level TEF would also highlight to the public that there is excellence in all sorts of HE providers but we think the cost and burden outweigh any additional benefit. However, there can be significant differences in the graduate outcomes of students who study in a specialist provider e.g. they are more likely to use their degree directly for their profession than those who study an apparently identical subject at a generalist university. Because of this there are often significant pay differences negatively skewed towards specialists, particularly in the early stages of e.g. careers in the creative and performing arts. We don't think providers should be penalised for this, when their graduates are in fact using their degree in a far more applied way.

26. Are there particular types of students, provision or providers that are disadvantaged by the current design of TEF, in a disproportionate way? If so, what changes could be made to address this? (250 words)

Yes. Small and specialist institutions have fewer resources to engage effectively with TEF compared to large multi faculty institutions. TEF usually lands on the desk of one person within a small/specialist HEI.

Data thresholds are also challenging for our members where courses are often taught in small groups. We have very few split metrics and some non reportable courses which adds complexity and creates a more unstable dataset. There are real potential negative consequences on recruitment for those that can't get a TEF rating because of their size.

It is also incredibly challenging for specialist providers to engage in subject TEF as well as institutional TEF. The data is very slightly different because one is benchmarking provider norms and the other subject norms - but for the provider themselves its one and the same. There is also the issue of singular outlier courses in other HECOS codes which add complications and burden.

Location and subject focus are also disadvantaged in employment outcomes. Providers in rural/coastal locations, those based in the north and those that offer creative arts degrees and agriculture degrees in particular are disadvantaged by measuring salary.

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We don't think there are simple fixes to all of these issues but not moving to subject level TEF would help. Small and specialist providers are always disadvantaged by exercises like this, and are often shut out of them altogether. We want to continue to work with the TEF development team on making this as fair as possible to smaller HEIs.

**27. Are there particular types of students, provision or providers that are advantaged by the current design of TEF, in a disproportionate way?
If so, what changes could be made to address this?**

Those that recruit the majority of students from higher social backgrounds, those with high prior attainment and those that live in the south east are at a significant advantage when it comes to graduate outcomes data. Salary and 'highly skilled' metrics are both biased towards the groups outlined above and to certain graduate professions.

To address this we believe we should be collecting other data in the outcomes section, such as the extent to which graduates feel their degree has helped them in their life. If TEF panels also understood the extent to which course content was being utilised in graduate professions they would be able to get a better sense of the extent to which the teaching and learning environment had impacted a graduates specific employment outcome.

Large multi-faculty providers are also at an advantage in institutional TEF as they are more easily able to suppress the importance of 'poorer performing' data from certain groups of students or subject areas.