

Independent review of the Teaching Excellence and Student Outcomes Framework (TEF): Response from Goldsmiths, University of London

Submitted March 2019

Note: Questions 1 to 9 relate to the institution and the individual filling in the questionnaire. The text below is copied direct from the questionnaire; Goldsmiths' responses are in blue italics.

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

Yes No Don't know

Why have TEF?

The Government has stated that the **purpose** of the TEF is to:

- better inform students' 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.

11. These purposes fall into two main areas: providing information, and enhancing the provision of higher education.

a. Which of these is the most important?

Providing information Enhancing provision Both are equally important
 Neither are important

b. Please outline below the reasons for your answers

We find the way this question is posed problematic, hence our response. We of course agree that providing information for potential students and enhancing higher education provision are both important, but we would argue that these are not, or should not be the most important objectives of TEF.

In terms of providing information to students, there is a range of more accessible, easy-to-comprehend sources of information available – from Unistats, to league

tables and Which? University, to universities own prospectuses and websites. It's difficult to see what TEF provides in addition to these and there is a risk that, whilst it is perceived as a simple assessment of actual teaching - which by its own admission it is only a proxy for - it is in fact more misleading than informative.

On enhancing provision, we would argue that whilst there is public interest in assuring the quality of our university provision, enhancement is and should remain within the autonomy of individual institutions, where ethos and strategy determine on-going development and student choices and achievements are a measure of success. From the perspective of a Bronze-rated institution, the claim that TEF is needed to drive enhancement is questionable – Goldsmiths is well aware of and has strategies in place to address the challenges we are encountering; to claim that we are doing this only because of TEF is inaccurate. Some, including our own SU, have argued that contrary to TEF driving enhancement there is a risk that it instead focusses institutions on superficial matters rather than the real experience of students, or to prioritise undergraduate over postgraduate provision. Additionally, we would argue that there is a risk of exercises like TEF driving homogeneity and stifling innovation in teaching and learning practices through a narrow set of metric-measured criteria.

Should there be any other purposes for TEF?

One of the stated objectives of TEF is to raise esteem for teaching and reward excellence in teaching. We would argue that this should be one of the primary aims of any such framework, and in this it can provide an aide to institutions in offering a form of external recognition.

However, the assessment of teaching and learning needs to be more nuanced. We believe that there is scope to conceive the TEF as a tool for reflecting on, articulating and celebrating the teaching and learning ethos of institutions. This would provide for different approaches to teaching and learning to be understood and offer an additional way to compare institutions for both students and other stakeholders such as employers.

What is TEF?

This section provides some information about how TEF is currently designed and being delivered to help inform your response. This overview of TEF should be considered when responding to the remaining questions in this call for views. In particular, when considering Terms of Reference 1 and 2 in the next section.

The TEF is a national exercise, introduced by the government in England and open to all UK higher education providers. It assesses excellence in their teaching and how well they ensure excellent outcomes for their students in terms of graduate-level employment or further study. Providers are given one of three ratings – Gold, Silver

and Bronze – or a provisional award if they do not yet have sufficient data to be fully assessed.

The diagram in Figure 1 provides an overview of the current TEF scheme (and elements proposed for subject TEF) and the process by which the ratings are determined. This shows that TEF draws on a mixture of quantitative and qualitative evidence. This includes measures drawing on existing quantitative data, all of which are gathered for other purposes, and a submission, which is written specifically to support the TEF process.

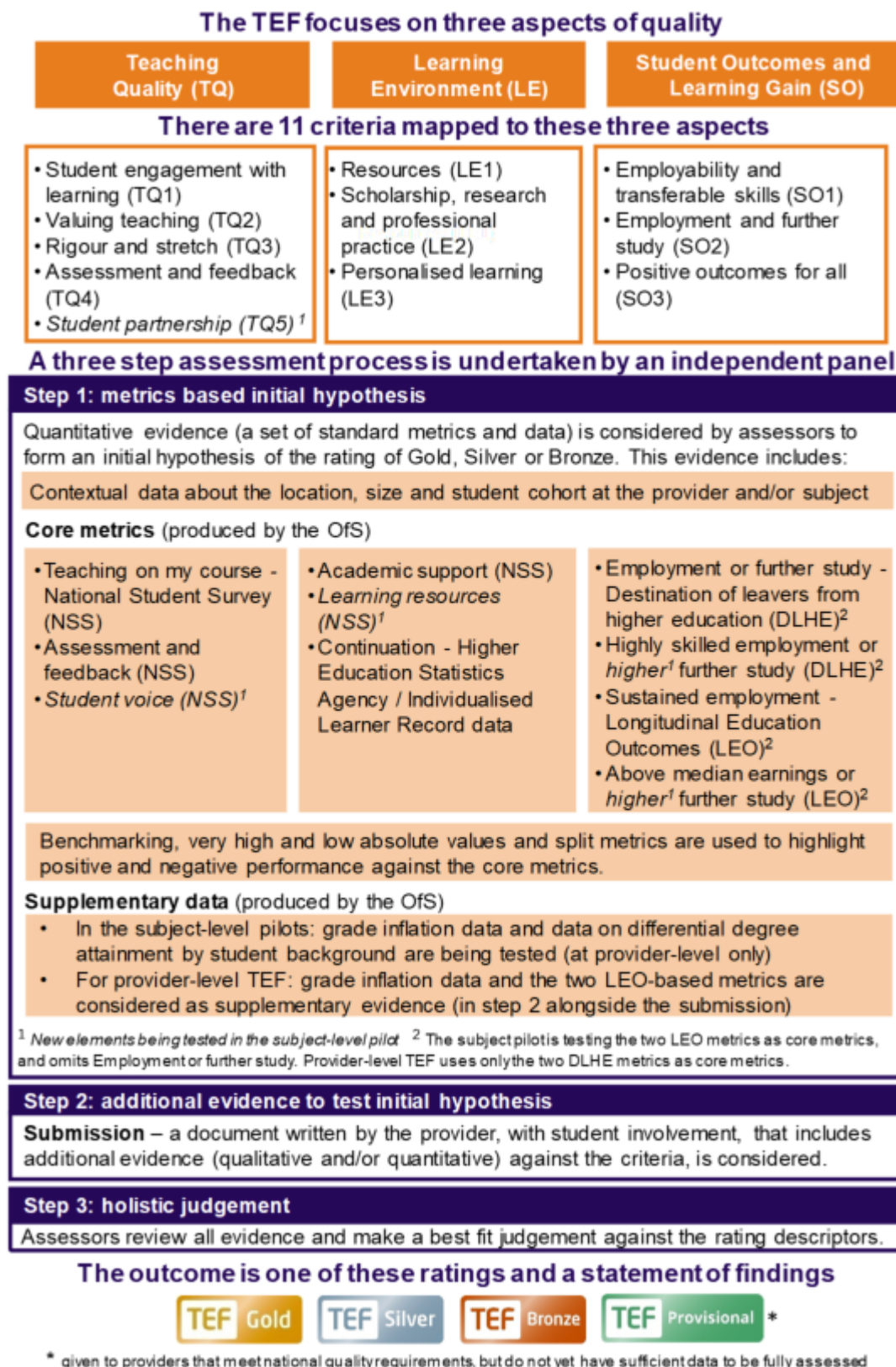
Some of the technical elements shown in the diagram are described briefly here:

- **Independent Panel** – TEF awards are judged by an independent panel of assessors, including students, academics (experts in teaching and learning) and experts in employment and widening participation.
- **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 out into sub categories to show how a provider performs with respect to different student groups (for example, age, ethnicity, educational disadvantage etc) and/or in different years.
- **Benchmarking** – This is used to allow meaningful interpretation of a provider's metrics by taking into account the mix of students and subjects taught at that provider. The benchmark is a weighted sector average where weightings are based on the characteristics of the students 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.
- **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

For more information about TEF, please see:

- The Office for Students' (OfS) [What is the TEF?](#) page for a brief overview of TEF
- OfS' [TEF information](#) pages for detailed information and technical documents
- The Department for Education's (DfE)'s [TEF page](#), including the [TEF specification](#).

Figure 1: The TEF process and evidence base



How does TEF work?

Terms of Reference

1: The process by which ratings are determined under the scheme and the sources of statistical information used in that process

2: Whether that process, and those sources of statistical information, are fit for use for the purpose of determining ratings under the scheme

An independent expert view of the statistical information used in TEF will be commissioned separately, but we would also like your views on the following questions.

As referred to in the TEF overview (previous section), TEF is being delivered at both provider-level and subject-level. We are interested in views on both. Please make clear which level you are referring to in your answers to each question.

13. Are the criteria used in TEF (see Figure 1 for a list of the criteria) appropriate?

Yes No Don't know

If not, what criteria would be more appropriate?

Given the complexities of understanding the quality of teaching and learning (see Graham Gibb's work on 'Dimensions of Quality' published by the Higher Education Academy), and if using a framework that allowed for more nuanced exploration of teaching and learning practice (as we suggest above), additional criteria could be considered:

- the diversity and relevance of the curriculum, including considering such matters as the relationship between research and the curriculum and the diversity of perspectives incorporated into content;*
- the range and quality of 'extra-curricular' opportunities beyond students' direct programmes of study, addressing the importance we know lies in these activities for student development and experience;*
- the 'value added' by the educational experience, the journey of taking a student from one level to another with an understanding of the scale of educational gain;*
- the 'educational philosophy' of an institution and how well this translates into the learning experience and benefits students in particular ways.*

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) appropriate?

Yes No Don't know

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

Being forced to call the metrics ‘proxies’ undervalues them. As the TEF currently stands, it is too easy to question its ability to measure the quality of teaching and the value of the learning experience. This easy criticism could be reduced if the direct link between the metrics and the criteria were removed. A wider basket of metrics could then be included but viewed as contextual information.

As participants in the current Subject pilot, we have some comments on how the metrics are being developed.

The evolution of the metrics has become a self-perpetuating exercise that becomes further removed from the actual purpose of the TEF with each iteration. Adding more NSS metrics, which we appreciate is in response to student feedback, is symptomatic of this. NSS is important, but it is not a measure of teaching quality and this was acknowledged by the earlier decision to halve the weighting of NSS metrics. But then why keep adding more? The resulting attempt to balance metrics across the three Aspects of Quality has now resulted in greater weight being carried by the other metrics, which leads one to question if they are really more important than the NSS.

The inclusion of salary data at 10 years post-graduation as a measure of one of the Aspects of Quality in the current Subject Pilot is hugely questionable – there are so many other factors that will influence salary and career trajectories over this timeframe beyond the undergraduate teaching experience.

Many of these problems could be resolved by our proposal to decouple the criteria from metrics and treat metrics as contextual.

With regard to the metrics in general, it would make sense for more recent years’ data to be treated as more significant or examined more closely. This would recognise the lag in the timeframe that data relates to and better recognise enhancement.

Finally, the flagging of subject-level data with sector-wide absolute high and low values is both confusing and not good statistical practice. We recognise the issue it seeks to address but view it as a misplaced effort to placate a small number of highly scoring institutions. Subject-level data should only be compared to subject-level benchmarks and absolutes.

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 No Don't know

b. Does TEF benchmark for the right factors?

We believe in benchmarking, although would press for location-adjusted benchmarking to be introduced to acknowledge and reflect the well-known 'London (and other metropolitan areas) effect'.

Additionally, there needs to be a campaign of awareness-raising around how the benchmarks are calculated as in our experience this is frequently misunderstood and can lead to unhelpful challenges. It is highly unlikely that the benchmarking is fully (if at all) understood by the proposed audiences of TEF.

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?

Although the claim has always been that the metrics and the narratives are balanced in value, the fact that the metrics are used to reach an 'initial hypothesis' means that in reality the balance of power lies with them. This is problematic where, as we have set-out above, the metrics don't speak directly to the criteria and in seeking to do so have been adjusted to meet the needs of balance across the framework rather than their actual value and insight. It would take away a lot of unnecessary complexity if the metrics were de-coupled from the criteria, allowing for more nuanced assessments of contextual metrics alongside qualitative evidence.

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

Are the ratings right?

Terms of Reference 3: The names of the ratings under the scheme and whether those names are appropriate

There are currently three ratings – Gold, Silver and Bronze – plus an additional Provisional award, given to participating providers that meet national quality requirements, but do not yet have sufficient data to be fully assessed. These are shown below.



We will be separately investigating the needs of applicants and employers as well as the international impact of the scheme and the ratings, but we would also like your views on the following questions.

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

a. Awarding a single rating?

Yes No Don't know

Please explain your answer

Attempting to distil the complexities of teaching and learning into a single rating is misleading and we believe risks damaging higher education by misrepresenting it.

We would propose that outcomes could be multi-dimensional, in much the same way as REF findings are, giving ratings for a range of different criteria. This would allow for greater understanding and recognition of nuances within and between the different aspects of practice and student experience.

b. With three levels of differentiation, plus a fourth rating for those unable to be assessed?

Yes No Don't know

Please explain your answer

The simplicity of having just three/four ratings is out of kilter with the level of complexity in the exercise. The limitations of the three ratings systems could be addressed by a more nuanced system that moves away from a singular outcome however.

c. Ratings named Gold, Silver, Bronze and Provisional?

Yes No Don't know

Please explain your answer

Gold/Silver/Bronze are too value-laden and their apparent simplicity undermines the complexities of the methodology utilised to reach them. Our Students' Union has stated that the Gold/Silver/Bronze ratings are 'patronising'.

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

a. For provider-level TEF?

We would propose that a simple pass/fail, 'meets expectations' measure is most appropriate at provider level, and in fact that current assurance processes already provide this.

b. For subject-level TEF?

We would argue that a form of TEF is most meaningful at subject level, where students identify most closely and degrees of autonomy for provision and enhancement often lie within institutions.

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.

Has TEF changed anything?

Terms of Reference 4: 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)

The review will consider the recently published [Evaluation of Provider-level TEF 2016-17 \(Year 2\)](#) as well as other available evidence, but we are also interested in your thoughts.

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

Yes No Don't know

If yes, how?

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. It will also be very difficult to understand

how much any change is a direct result of TEF and how much is a result of institutional self-reflection and development.

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

Yes No Don't know

If yes, how?

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

Yes No Don't know

If yes, how?

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

Yes No Don't know

If yes, how?

Is TEF worth it?

Terms of Reference 5: An assessment of whether the scheme is in the public interest

We are interested to assess whether the scheme provides outputs that are in the public interest and arrives at these outputs in a cost effective way that meets public interest principles.

The review intends to consider research about the costs and benefits of provider and subject level TEF, but we are also interested in your views of the range of benefits, and costs, of the scheme to individuals, institutions and society.

23. Does TEF help you as a student/provider/employer?

Yes No Don't know

Please explain the reasons for your answer.

Its benefits lie in recognising and valuing teaching practice and driving parity between teaching and research. With adjustment, as we have suggested elsewhere in this questionnaire, its value could also lie in providing a framework for reflecting on and articulating teaching and learning practices and student achievement.

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

- a. Provider-level TEF?
- b. Subject-level TEF?

At both levels the cost is essentially staff time, which at Goldsmiths has been significant though difficult to quantify.

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

- a. Provider-level TEF?
- b. Subject-level TEF?

See above.

Is TEF fair?

Terms of Reference 6: Any other matters that the appointed person considers relevant

The review will also consider whether the overall TEF process delivers effectively for all across a diverse sector.

In the following question, we are particularly interested in views about:

- providers in Scotland, Wales and Northern Ireland;
- harder to reach applicant/student groups;
- part-time students and part time provision;
- small providers;
- specialist providers and specialist provision;
- private providers;
- further education colleges providing higher education.

26. Are there particular types of students, provision or providers that are disadvantaged by the current design of TEF, in a disproportionate way?

Yes No Don't know

If so, what changes could be made to address this?

Smaller institutions may be disadvantaged by the burden of undertaking TEF within more limited resources. Undertaking submissions at both subject and provider levels adds to the burden. Removing the provider assessment could help with this.

27. Are there particular types of students, provision or providers that are advantaged by the current design of TEF, in a disproportionate way?

Yes No Don't know

If so, what changes could be made to address this?

Smaller, specialist institutions may be advantaged by having greater ease in articulating their ethos and practices within the constraints of TEF (this claim is evidenced by the number of small specialist institutions receiving 'Gold' ratings to date). Focusing assessments at only subject level would help to address this.