Response to the Teaching Excellence Framework Technical Consultation: Year Two

Submitted 12 July 2016 to the Department for Business, Innovation and Skills.

On 12 July 2016, we submitted a response to the BIS consultation on Year Two of the TEF (2017/18). This followed the publication of the Higher Education White Paper in May 2016, outlining the new Teaching Excellence Framework and a number of other changes to higher education. [You can read the TEF proposals here](#).

Questions regarding this response should be directed to president@hertfordshire.su

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Question 1
Do you agree with the criteria proposed in Figure 4?
Yes.

Question 2
   A) How should we include a highly skilled employment metric as part of the TEF?
Hertfordshire Students   welcomes the move towards including a highly skilled employment metric, as too often underemployment distorts the employment data marketed at students and applicants. We would like to see amended SOC groups and see the TEF adapt to fit the outcomes of the 2016 ONS review, so that groups 1-3 more accurately reflect graduate-level jobs.

We do, however, have concerns over the perceived relationship between employment and teaching quality, particularly considering the role that the institution
characteristics plays in this area. We welcome the ongoing review of employment metrics to more accurately reflect the quality of teaching.

   B) If included as a core metric, should we adopt employment in Standard Occupation Classification groups 1-3 as a measure of graduates entering highly skilled jobs?
Yes.

   C) Do you agree with our proposal to include all graduates in the calculation of the employment/destination metrics?
Yes.

Like many students
data, particularly where response rates might be lower than expected. Calculating the destination of all graduates would more accurately reflect the quality of teaching and employment support within providers.

We would also encourage the Office for Students to seek out new opportunities to measure the employment rate of overseas and other EU students in future years of the TEF. This will be of particular concern if providers use the TEF ratings as marketing tools overseas and to justify future increases in tuition fees.

Question 3
   A) Do you agree with the proposed approach for setting benchmarks?

Yes.

B) Do you agree with the proposed approach for flagging significant differences between indicator and benchmark (where differences exceed 2 standard deviations and 2 percentage points)?

Yes.

Question 4
Do you agree that TEF metrics should be averaged over the most recent three years of available data?
Yes.

We agree that averaging the data over multiple years would highlight any consistent issues within the provider

However, we welcome the proposal to report the flags for any individual years with statistically significant returns. We would seek assurance that, in averaging multiple years of data, statistically significant years are only flagged, and not removed.

Question 5
Do you agree the metrics should be split by the characteristics proposed above?
Yes.

These are the characteristics most widely used within the higher education sector and reported within providers, so would hold the least additional administrative burden to providers.

Residual household income is often used by a number of sector organisations (including Student Finance England) to measure socioeconomic background, as opposed to POLAR data. We recommend that residual household income be considered as an additional characteristic, as it holds a quite different value and definition of participation to POLAR data.

Question 6
Do you agree with the contextual information that will be used to support TEF assessments proposed above?
Yes.

As above, residual household income could be a perhaps more effective measure of socioeconomic background, particularly for contextual purposes. A characteristic that increasing numbers of providers are also measuring is the number of students who are first generational higher education participants, the first in their family to enter into a higher education qualification.

We welcome the inclusion of data maps, particularly for regional providers and those with a high number of

Question 7
A) Do you agree with the proposed approach for the provider submission?
Yes.

B) Do you agree with the proposed 15 page limit?
Yes.

We welcome the provider submission and the inclusion of qualitative and additional evidence in the TEF assessment. However, we believe that the provider submission should not be weighted too heavily, particularly against the core metrics. We recommend that providers are distributed a robust framework for the submission to ensure that it is not used by providers to justify any statistically significant returns in their core metrics.

Question 8
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?
Yes.

A key indicator of teaching quality within providers is student attainment, and particularly value added attainment. While this isn
submit attainment and success data, split across the diversity characteristics discussed earlier, within their provider submission. We would seek assurance in this case that providers are including evidence, as proposed, on how they are identifying and preventing grade inflation.

With the quality assurance process due to be reformed to be a returns-based annual exercise, there is currently no formal system for students
This submission, currently a requirement of the QAA review, is an invaluable exercise for both students and providers. We recommend that a short, qualitative submission from a provider students
as included in the proposal, that in this case providers may be disadvantaged by non-cooperation by their students
survey. This survey should be a standard alternative questionnaire, for consistency there would be limited comparability were each provider to design their own questions. Likewise, we would recommend that a framework be made available to students
student submission.

Question 9
   A) Do you think the TEF should issue commendations?
Yes.

   B) If so, do you agree with the areas identified above?
Yes.

We suggest that commendations for excellence in student partnership or learner voice, highlighting the importance of learner engagement, are also considered.

Question 10
Do you agree with the assessment process proposed?
Yes.

Question 11
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.

We believe that providers should have a solid and consistent track record on which to base their award and ratings.

As previously mentioned, we welcome the averaging of multiple years of data to provide a broader view of a provider, especially for small cohorts.

Question 12
Do you agree with the descriptions of the different TEF ratings proposed in Figure 9?
Yes.

We agree with these short descriptions, but would suggest that the name of the
reviewed. Without the wider context of the TEF, this rating could be misconstrued by applicants and prospective students as the top rating. Instead, we recommend that the name   eds
Expectations