

## Russell Group priorities for the Teaching Excellence Framework

*Russell Group universities are dedicated to enhancing the quality of the teaching and learning they provide, investing in infrastructure and resources, technology-enabled learning, and support and rewards for teaching-focused academic staff. Whilst we welcome the Government's ambition to provide more meaningful information about quality at subject-level to prospective students, the models which have been tested for delivering subject-level assessments through the Teaching Excellence Framework (TEF) are seriously flawed. In further developing the TEF, we encourage the Government to draw on existing data about subject-level provision, reform and strengthen the provider-level exercise, and support continued efforts to enhance the quality of learning and teaching by institutions and through the Office for Students registration conditions.*

### 1. Summary

We share the Government's ambition to provide meaningful information at a more granular level to assist prospective applicants in their decision-making and to promote the enhancement of teaching and learning and so improve teaching quality across UK HE. Our focus has always been on academic excellence, but we also provide the wider experiences that students today need to be successful.

We have engaged constructively throughout the development of the provider level and subject level TEF. Our Russell Group TEF technical group fed into, and supported, policy formulation and implementation at the request of the Department for Education and ten of our members have participated in at least one of the subject-level TEF pilots, investing considerable time and effort to do so.

**We remain concerned, however, that the subject-level models which have been tested are not capable of generating helpful information for prospective applicants or offering sufficient opportunities for institutions to demonstrate excellent teaching.**

Instead, we encourage the Government to take forward the development of TEF as follows:

- Bringing together existing information and data about subject-level provision for prospective applicants, potentially as a new element in the provider-level TEF
- Strengthening provider-level TEF through a number of reforms including: focusing on absolute performance alongside benchmarked scores, replacing the medal rating system with a more granular "profile approach", and ensuring institutions subject to NSS boycotts or action are not penalised
- Supporting institutions' activity to enhance learning and teaching in individual subjects and dealing with poor quality provision where this exists through the Office for Students registration conditions.

### 2. Flaws with subject-level TEF models proposed so far

Weaknesses in the subject-level TEF models which have been proposed so far include the following:

- While the numbers of students on individual courses are too small to enable any meaningful analysis, aggregating students into large enough groups to enable comparison at subject-level undermines the validity of the exercise. It means treating disparate groups of students as though they are the same.
- Indeed, the subject groupings which have been piloted aggregate a range of different courses together which do not share similar approaches to teaching and learning. Many of the subject

groupings contain courses which are often taught in different departments or even different faculties. This will, in turn, lead to false comparisons being made and so risks misleading prospective applicants rather than providing them with useful information.

- Even though courses have been grouped together for the purpose of assessment, as a result of the benchmarking methodology the data being used in subject-level TEF is based on such small numbers there is a risk that outcomes could be determined by random year-on-year fluctuations as opposed to genuine variations in quality.
- Despite this, many of the metrics at some providers will be suppressed as student numbers are too small. This means, for some institutions, awards will be made based only on partial data, whereas for others, awards will be based on the full suite of data. This risks misleading prospective applicants who will not be comparing “like with like” and won’t be able to distinguish between ratings which have been awarded based on very different sets of data.
- The metrics of providers offering certain subjects are clustered together within a very small range. For example, the performance of graduates in entering highly skilled employment and further study for medicine, dentistry and nursing is extremely high. This effect is likely to lead to a preponderance of golds in some subjects and, potentially, of bronzes in others. It is difficult to see how this helps applicants differentiate between providers. In cases where the majority of providers could receive a bronze for a particular subject – based on benchmarked data rather than absolute performance – this could create an incentive to close courses.
- The subject-level methodology has been designed predominantly for students studying single honours courses. The framework being piloted does not capture the experiences of students who are studying joint or multiple honours programmes, those undertaking modules in other departments and other faculties, or those studying courses which cross discipline boundaries (like natural sciences or liberal arts degrees). Universities are increasing their provision of inter-disciplinary courses to meet student and employer demand, and subject-level TEF risks discouraging these innovative new programmes.

**Overall, the complex subject-level methodology is very difficult to understand and explain to students.** Research undertaken by a consortium of students’ unions<sup>1</sup> found no evidence that students understand TEF ratings are based on benchmarking, and not absolute performance, rather they assumed it was valid to compare one gold institution with another. Coupled with the statistical flaws inherent in the subject-level models tested so far, we are therefore concerned a subject-level assessment exercise as currently conceived could mislead rather than aid prospective students.

Any subject-level assessment exercise is likely to be costly for Government and providers - an analysis by Universities UK estimated the cost to providers of delivering subject-level TEF to be at least £37 million, paid for ultimately through student tuition fees. It is therefore imperative that the exercise delivers value-for-money by fulfilling its purpose of providing meaningful and robust information to prospective students and incentivising good quality higher education provision.

### 3. Delivering a meaningful TEF

#### *Providing subject-level information to prospective students*

Evidence suggests that rather than producing more information for prospective applicants, it would be better to support them to make more effective use of existing information. A better way of supporting applicants to make informed choices would be to bring together existing data and information sources in a more sophisticated and user-friendly online interface, potentially as an additional element integrated into the provider-level TEF exercise. This could allow applicants to select information according to their own priorities, preferences and abilities, recognising that students are not a homogenous group.

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<sup>1</sup> <https://studentsunionresearch.files.wordpress.com/2017/11/tef-pr-research-report.pdf>

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### *Strengthening the provider-level TEF*

Alongside this, we would like to see the Government overhaul and revamp provider-level TEF as a priority including:

- Replacing the gold, silver, bronze medal rating system with a “profile approach” which could involve providing much more helpful information about institutional strengths and weaknesses on a dashboard where informed comparisons can be made.
- Addressing the significant flaws in the benchmarking methodology by placing substantially more weight on absolute values alongside benchmark and sector average scores. This would recognise and incentivise high performance more effectively and would better reflect prospective students’ understanding of TEF ratings.
- Ensuring institutions subject to NSS boycotts, or action which could skew NSS results, are not penalised in the assessment process. This is especially important as some universities have no published NSS metrics at all for TEF4.

### *Enhancing the quality of learning and teaching*

Russell Group universities are already dedicated to enhancing their provision for the benefit of their students and are delivering on this commitment in a wide range of ways including (but not limited to) the following:

- funding and undertaking new research into teaching and learning through internal teaching innovation funds and in-house teaching-focused journals
- recognising and rewarding contributions from academic staff through promotions criteria to support teaching staff to progress, annual teaching awards, and fellowship and CPD opportunities
- use of technology-enabled learning to maximise the value of face-to-face interactions between students and academics, and collection of data through learning analytics to improve learner outcomes
- investment in learning and teaching resources including libraries, museum collections, teaching spaces, labs, IT services, and subject-specific resources.

Rather than using a retrospective benchmarked exercise such as TEF to address poor quality provision where this exists, the Office for Students has the power to do so through its registration conditions for providers. One option for improving the quality of provision on offer would be to raise the regulatory baseline for quality conditions.

December 2019