

## Russell Group input to the BIS Select Committee's inquiry – Assessing Quality in Higher Education

### 1. Summary

- 1.1 There is already a raft of 'mechanisms' within the higher education system to drive up quality:
- (a) The fees-based system has driven and continues to drive up teaching quality. But the system is still embryonic and needs time to really take effect and then bed down and there are features of the new system that could be improved.
  - (b) Information flows are a key factor in any properly functioning market and these have certainly improved, for example: with KIS, the National Student Survey and a wide range of information available on and through the UCAS and Unistats websites. However, a review of how relevant information is organised and accessed would be appropriate.
  - (c) Moreover, there are already many ways by which quality of teaching and learning is assessed and assured including:
    - i. Internal quality assurance mechanisms
    - ii. The external examiner system
    - iii. Quality Assurance Agency (QAA) reviews
    - iv. Extensive audit and reviews by a wide-range of Professional, Statutory, and Regulatory Bodies (PSRBs).
- 1.2 The result of all of these factors can be seen in very positive statistics about the UK higher education system. For example: in 2014 the National Student Survey (NSS) recorded student satisfaction at a 10 year-record high; similarly, demand for places in HE was also recorded at the highest ever level. New graduates are also in great demand with employers: the Association of Graduate employers are expecting an 11.3% increase in demand for the current 2014-15 cycle. These factors indicate the teaching system is not perceived by students or employers to be in need of further measures to drive up quality.
- 1.3 We are not arguing that everything is perfect, but that we already have appropriate systems in place and these are continuing to evolve effectively as expectations in the HE system rise.
- 1.4 The proposal to introduce an 'excellence framework' only increases regulation and potentially duplicates existing processes; but on the other hand if it is very light (e.g. relying on just a few metrics) then it is likely to be highly inaccurate and could be very damaging. A perverse consequence of the framework is that it may even stifle innovation in teaching.
- 1.5 However, if the Government wishes to introduce another, and additional, form of regulation then this is how we would suggest they create their model:
- (a) If a TEF is introduced it should ensure excellent teaching is encouraged and rewarded appropriately. It should not duplicate other QA efforts and needs to be as light touch as possible while ensuring that the TEF is seen to be credible.

- (b) We would like to see universities being allowed to choose from a basket of measures within broad categories.
- (c) TEF must not undermine university autonomy or financial stability.
- (d) The focus should be on teaching and outcomes for students. TEF should include measures to reflect the proximity of teaching to high quality research activity, investment in facilities/ resources and staff to student ratios etc.
- (e) Qualitative metrics in TEF may need to be supported by a light touch narrative element to help set the context for measures chosen by institutions.
- (f) TEF should reflect the diversity across HEIs and the diversity of approaches to teaching in different subjects even within the same university. There is no simple 'one size fits all' model.

## **2. Key Points about ensuring quality in learning and teaching**

- 2.1 We welcome the opportunity to contribute to this inquiry into assessing the quality of higher education, covering the ongoing review of Quality Assurance (QA) and the Government's proposal to introduce a new Teaching Excellence Framework (TEF).
- 2.2 The purpose of the Russell Group is to provide thought leadership and strategic direction for the 24 major research-intensive universities of the UK; we aim to ensure that policy development in a wide range of issues relating to higher education is underpinned by a robust evidence base and a commitment to civic responsibility, improving life chances, raising aspirations and contributing to economic prosperity and innovation.
- 2.3 Our universities produce excellent research on a grand scale and they compete on an international stage to attract the brightest minds from around the world to study, research and teach. They are committed to providing an outstanding student experience, where teaching is enhanced by world-class research and facilities.
- 2.4 It is vital that any new quality assessment system, or development of the current system, supports this position, and protects the UK higher education 'brand'. A new QA regime should eliminate unnecessary burdens and support a system that recognises and rewards institutions delivering high quality education.
- 2.5 It is important not to lose sight of the fact that introducing a fees-based system of funding has already been a key driver for increasing the quality of teaching. But the system is still embryonic and needs time to really take effect and then bed down and there are features of the new system that could be improved.
- 2.6 Moreover, universities have in place systems and processes for assuring quality and to reward staff who are the best teachers. Teaching is also subject to regular review in the HE review process undertaken by the Quality Assurance Agency (QAA) on behalf of HEFCE. In addition, university teaching is also subject to review by external examiners and (in professional and vocational subjects) by Professional, Statutory and Regulatory Bodies (PSRBs) such as the Bar Standards Board for law degrees.
- 2.7 Taken together, these systems and processes are already working to drive up the quality of university teaching. Indeed, our universities continually strive to improve their teaching offer, investing heavily in new teaching resources, facilities, equipment and excellent teaching staff.

### **3. Quality Assurance review (Questions 1 and 2)**

- 3.1 The UK higher education system is renowned globally for its quality; indeed the UK ranks second only to the US in the number of world-class universities and the global reputation of our leading universities remains strong.
- 3.2 As noted above, universities already have their own systems and processes in place for assuring teaching quality. This includes engagement with PSRBs (where appropriate), using a well-regarded external examiner system, and a range of other internal processes alongside the formal reviews undertaken by the QAA.
- 3.3 Our universities will not flourish if they are overregulated and it is important that resources should be focused where problems of quality are most likely to occur. QA should therefore be risk-based and proportionate, with regulatory resources focused on new providers and areas of weakness. Any new QA system must have three core components:
  - It should be demonstrably risk-based
  - Standards should be consistent, but regulation should be proportionate
  - Any new HE providers should be subject to the most rigorous QA tests.
- 3.4 Universities with a strong track record of success, and which have been delivering high quality education for a long time, should be subject to considerably less inspection and bureaucracy than newer institutions. This will also provide for the most efficient use of public funds.

### **4. Objectives of a Teaching Excellence Framework (Question 3)**

- 4.1 If a Teaching Excellence Framework (TEF) is to be introduced it should support universities in managing and delivering high quality teaching and learning in diverse ways. It should help encourage esteem and reward for high quality teaching staff.
- 4.2 A Green Paper on the TEF is expected soon. It is clear that some measure of comparability between institutions will be necessary in the TEF and that, at least for early iterations of the TEF, assessments will need to be made at the institutional level. There is also an assumption that performance in the TEF will be used to determine university eligibility for the tuition fee cap uplift in line with inflation announced in the Summer Budget, although a direct link between the two has not yet been confirmed.
- 4.3 It is important to highlight how leading universities are already focused on the importance of esteem and reward for high quality teaching staff. Government could help provide even more backing for this through publicly-funded scholarships for staff to promote high quality teaching in universities.
- 4.4 If a framework needs to be more 'hands on', then it is preferable that institutions considered 'high risk' should be examined more frequently than those considered 'low-risk' in regards to teaching quality. This would save money and ensure that no unnecessary burden was imposed. This approach would also decrease the risk of excessive bureaucracy when efforts could otherwise be spent delivering quality teaching. Development of the TEF should link to a new (and hopefully tiered and risk-based) QA regime and must not duplicate effort.

- 4.5 The TEF assessment should reflect the extent to which university teaching is already subject to scrutiny by PSRBs and avoid duplication here as well. These bodies already exercise exacting quality assessment standards on the courses that they validate on behalf of their respective professional bodies.

#### *Assessing teaching excellence*

- 4.6 Whatever the agreed arrangements are in place, there will need to be robust procedures for the collection, processing and publication of data, having regard to the requirements of the Information Commissioner.
- 4.7 We would argue that the inputs to the TEF should be a basket of measures and that this basket must include a measure to reflect the relationship between high quality teaching and high quality research activity. There is no “one size fits all” approach to measuring teaching excellence, so we have proposed a small “basket” of quantitative measures for inclusion in the TEF, some of which should be common to all universities, and some of which universities can choose themselves (from a set of measures that are appropriate and relevant) based on their own mission and style(s) of teaching). This might form a “Core Plus” model of assessment.
- 4.8 The “Core Plus” model and ability to select from a basket of measures also enables universities to compete effectively and develop their distinctive different offerings.
- 4.9 These quantitative measures should be complemented by a short qualitative statement setting the quantitative measures in context.
- 4.10 The basket of measures should not include measures that are unrelated to teaching, as this would risk creating perverse incentives to shift resources away from teaching and into other activities (e.g. widening participation) that do not contribute to the quality of teaching.
- 4.11 The basket of measures should not include simple ‘value-added’ measures as these would not capture the great diversity and value of educational experiences, for example: academic content, growth in confidence, team-working ability, and entrepreneurial skills. Any ‘value-added metrics risk creating perverse incentives to move effort and resource away from the rich and diverse mixture of skills and personal development opportunities graduates need into a narrower model of higher education.
- 4.12 Under a ‘Core Plus’ model, there might be judgement required as to whether the measures used were appropriate to each institution, and the weight to attach to each in arriving at the final assessment. There should be appropriate guidance issued to the assessor on how to undertake an effective review.

#### *Qualitative measures*

- 4.13 The TEF should include appropriate qualitative measures of teaching excellence in addition to quantitative measures. These measures could include an evaluation of the teaching environment. The REF 2014 exercise included a section on the research environment, so this could be a useful point of comparison between research and teaching at a particular institution.
- 4.14 The scope of any qualitative measures would need to be agreed. An approach which attempts to make statements about teaching at a more granular level (faculty, school, department etc.) has the potential to add complexity and burden to the TEF exercise. There would also need to be an agreed basis for attaching relative weights to the data

related to different faculties/schools/departments, based on student numbers or similar measures.

- 4.15 We would like the TEF to show how teaching of the sort the Russell Group delivers is shaped by an active research environment. The TEF should, for universities of this type, make a strong link with the Research Excellence Framework. A measure of research environment in which the student is a learner would be most appropriate. Excellent research is of great benefit to the provision of teaching excellence, allowing students to learn from leaders in their chosen field of study.

## **5. TEF and a new QA system (Question 4)**

- 5.1 It is important the TEF when it is introduced works in close alignment with the new QA system and processes. There would be scope for the two frameworks to be closely aligned so as to avoid duplication and any unnecessary extension of the regulatory burden.
- 5.2 Whilst we recognise the objective of the TEF to measure teaching standards accurately across higher education institutions, we have reservations about how these new measures may be interpreted and implemented. An over-prescriptive TEF that is not linked in any meaningful way to a new QA system would be out of sync with the way in which higher education institutions are developing flexibly in response to changes in technology and cross-cutting burdensome data requirements.
- 5.3 A prescriptive and compliance driven TEF would divert academic attention away from the most critical areas of teaching and learning. Above all seeking an overtly regulatory TEF and concurrent QA process could lead to over-bureaucratising the way in which academic leaders provide their tuition to students. Innovation and an entrepreneurial approach to learning needs to be cherished; if our evaluations become too rigid, not working in harmony with one another, we put this at risk.

## **6. Main challenges in implementing a Teaching Excellence Framework (Question 5)**

- 6.1 The Government's timetable for implementation of the Teaching Excellence Framework, with a first assessment due to be published in 2016 is very challenging, and becomes more so as the date for publication of the HE Green Paper has slipped back. Experience of developing the Research Excellence Framework and its precursors suggests that the TEF may take a number of iterations, over many years to develop and refine. The Government should, therefore, be cautious of attaching too much weight to the first outputs from a new framework.
- 6.2 There is likely to be a negative impact on the competitive position of UK universities if the TEF appears to suggest that only a small proportion of the taught provision is of a high quality. On the other hand, a framework that suggests that close to 100% of teaching is excellent would not be credible.
- 6.3 Creating a system where there is a binary divide between institutions whose teaching is judged as "excellent" and those whose teaching is "not-excellent" would be highly problematic, as it will require very fine decisions at the margin for those institutions whose teaching quality is judged to fall close to that dividing line. This is particularly true given the impact (in terms of fee income and reputation) for any institution whose teaching is judged to be "not excellent".

- 6.4 Data on outcome measures, for inclusion in the TEF, can be volatile for reasons unrelated to teaching excellence: there is a case for using data from more than one year, to smooth the results.

#### *QA for other functions*

- 6.5 The QA regime does need to change and, as we have set out above, the new system needs to be risk-based and proportionate. This would also make the system more cost effective for all involved, allowing resources to be focused where the need for improvement is greatest. HEFCE is right to acknowledge the important role that PSRBs play in quality assurance and we hope that this effort is not duplicated in the new system. However, the current QA model is also used for purposes beyond the needs of the higher education Funding Councils. This includes Home Office regulation of visa compliance. Home Office visa regulation includes a provision for 'Educational Oversight' of all educational institutions sponsoring visas for non-EU students and staff. The Home Office depends on the outcomes of the current QAA review to determine those institutions eligible to sponsor international students. This arrangement is governed by a memorandum of understanding which sets out the roles and arrangements for Education Oversight on behalf of the Home Office.
- 6.6 In the absence of a unified system there is a risk of other authorities like the Home Office constructing new means of QA assessment or placing new reporting requirements on universities. Either scenario will contribute to another level of regulatory burden for universities and, possibly, confusion for international students.
- 6.7 An appropriately tiered and proportionate QA system as recommended by the Russell Group in our response<sup>1</sup> to the most recent HEFCE consultation may help nullify the risk of new QA systems created by other regulators and authorities.

#### *Other risks*

- 6.8 Prospective students and employers will use the TEF as an indicator of teaching quality when making judgements about where to study and who to employ. The financial cost of not being judged excellent according to the TEF is likely to be greater (in terms of reduced demand for places and reduced fee income) than the benefits of a small inflationary increase in tuition fee income.

#### *Use of the National Student Survey (NSS)*

- 6.9 It has been suggested that one measure of quality in teaching excellence at a university could be derived from using the National Student Survey (NSS) as a proxy for quality experienced by students in tutorials or seminars. We would have some reservations about this measure being implemented in this way, as it would undermine the stated purpose of the NSS, whilst providing an inaccurate check against the quality of teaching on a specific course.
- 6.10 The NSS is a well-established student satisfaction survey, but it was never designed to measure 'teaching excellence'. It is a snapshot of students' responses to a number of statements about their university course, with students responding using a five point scale. The results of the survey are purely quantitative and limit the effectiveness of the survey to a snapshot of student satisfaction at single point on their course.

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<sup>1</sup> <http://www.russellgroup.ac.uk/policy/policy-documents/quality-assessment-review-consultation/>

- 6.11 Calibrating the results of the NSS across different universities and subjects studied does not effectively allow for students to make a meaningful comparison in terms of quality, given that each respondent is only likely to have experience one university and one subject. As a survey, the reliability of the NSS (and the confidence that can be placed in its results) is limited by the number of responses. Therefore the absolute scores need to be used with care, particularly when drawing firm conclusions about the effectiveness or quality of teaching. Experience also suggests there are some groups of students (medical and dental students in particular) that are often harsher in their scoring on the NSS, so universities with a high proportion of such students would be disadvantaged. Studies have also shown that many students complete the survey in just a few minutes, suggesting that they have not fully engaged with the process.
- 6.12 There are also concerns about perverse consequences around completing the NSS if it is a component of TEF and thus linked to future tuition fee increases. In this situation we might expect students to mark down universities in order to keep fees low for future cohorts.
- 6.13 If the NSS is to be used as part of TEF then teaching, rather than other elements, should be the focus, and the NSS has a section (questions 1-4) devoted to this.

#### *TEF panels*

- 6.14 With robust judgements needed on the TEF submissions made by institutions (in particular any qualitative element), we understand that the idea of an independent TEF assessment panel is being considered. Clearly the membership of the TEF panel will be critical and it is important that this should include senior, and respected, individuals from leading universities who are fully able to evaluate teaching excellence.

## **7. Fee levels and teaching quality (Question 6)**

- 7.1 In the Summer Budget statement on 8 July 2015, the Chancellor of the Exchequer announced:
- “Driving up the quality of higher education is also important, and this Budget announces a number of measures to address this. These include allowing institutions offering high teaching quality to increase their tuition fees in line with inflation from 2017-18, with a consultation on the mechanisms to do this.”
- 7.2 This statement makes an implied link with TEF, although that has still not been confirmed. The version of TEF that is available in 2016 to inform decisions on any increase in the tuition fee cap for 2017-18 is likely to be only the first iteration of the TEF. It may not be a sufficiently robust measure of teaching excellence to be linked to any long-term indexation of the fee cap.
- 7.3 Allowing the maximum fees cap to rise in line with inflation will help to ensure universities can afford to continue to deliver high quality teaching. Since 2012 the value of the maximum tuition fee has been steadily eroded by inflation, and we welcome the Government’s decision to allow indexation, although we would have preferred this to have happened sooner.

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