

# Response ID ANON-NHMS-54V7-C

Submitted to **Teaching Excellence Framework: Technical Consultation for Year Two**

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## Introduction

### What is your name?

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### What is your organisation?

**Organisation:**

The Staff and Educational Development Association

### Please select the option below that best describes you as a respondent to this consultation

**Organisation type:**

Professional Body

**Additional details (if required):**

SEDA would wish to support a framework, which genuinely positions student learning at the centre of HE. Students are at the heart of all that SEDA does and, as a body, SEDA aims to improve student learning and to defend it from any perceived or potential dangers, utilising evidence from our scholarship of and research into learning and teaching. The importance of elements including curriculum design, programme planning in partnership with students, the learning environment, and a highly skilled workforce are essential in creating powerful learning experiences and metrics that detract from those aspects, could pose a threat to the quality of HE.

SEDA and its membership of approximately 100 institutions (largely UK Higher Education) are highly knowledgeable and skilled in teaching and supporting learning in higher education; taking an active role in numerous policy-driven and policy-driving initiatives, since its inception 20 years ago. These include being the initial driver in the development of training in teaching and supporting learning for new academics; drafting the original UKPSF; being an invited member of the round table discussions chaired by David Willetts in 2011 to explore what more could be done to incentivise excellent teaching in higher education and responding to the initial TEF consultation. The SEDA network is a passionate and active one that shares good practice nationally and internationally through various organisations, including the International Consortium of Educational Development. SEDA is a values-driven organisation, committed to educational development and the advancement of education for the benefit of the public and works to this end, particularly, through educational and professional development.

To this end, SEDA works with its members and the wider higher education community, to:

- Lead and support improvements in the quality of students' educational experiences
- Deliver and support the professional development of new and experienced academic staff; staff in learning and teaching support roles; and those involved in special initiatives to enhance and develop learning and teaching across the higher education sector
- Support institutional members in relation to strategic educational change and development
- Enhance capability in leading and supporting educational change
- Foster, through scholarship, a greater understanding of educational development, the teaching process and the nature of students' learning.

A central point that SEDA would like to underline in its response to the technical consultation is that, in its current form, this is not a teaching excellence framework; rather it is a framework that reflects the provider and the reputation of the institution. It is about provision, not teaching.

SEDA understands that, in order to establish the TEF, it makes practical sense to use existing national metrics; however, SEDA would like to express concern about the metrics identified. This has been explored further in the responses. SEDA would like to express a hope that some of the currently flawed measures will be removed in due course and replaced by potentially much richer, more focused metrics, for example, data around learning gain (as funded by HEFCE). SEDA would like to commend this work on learning gain, which could result in more focused, informative data for measuring the quality of learning and teaching. If the TEF is to be at all meaningful, it must be a developing and developmental process. Currently, this is not built into the proposals; instead, the proposed process points strongly to the potential for risk aversion from institutions.

Further to our specific responses below, SEDA would be willing to work with BIS and relevant bodies to:

1. Position 'Learning' as a central tenet of such a framework i.e. evolving into a 'Learning and Teaching Excellence Framework'
2. Support the creation of 'appropriate and contemporary evidence' (i.e. Figure 4 and Figure 6) in partnership with other professional bodies/groups (if willing) such as:
  - a. Heads of Educational Development Group
  - b. Association for Learning Technology
  - c. Principal Fellows of the HEA

d. Others

3. Create a template for written submissions to guide and focus the responses within the 15-page institutional reports, allowing some autonomy within boundaries, informed by pedagogic literature and evidence.

4. Support the development and evaluation of any future metrics aligned to Teaching and Learning Excellence, both in evidence and scholarship e.g. Learning Gain and Analytics.

## Consultation Questions (page 1 of 4)

### Q1: Do you agree with the criteria proposed in Figure 4?

No

#### Question 1 further detail:

Broadly speaking, SEDA agrees with the three 'Aspects', but not with the 'Criteria' suggested for each aspect. These need substantial revision. They are retrograde in that they do not mention critical elements of higher education such as creativity, challenge and engagement.

#### Aspect: Teaching Quality

The criteria, in general, appear to be very static and do not position the students centrally and actively, instead relegating them to a position of passivity and as recipients of an education that is 'done to them'. SEDA believes fundamentally in a learning community and partnership model, where students are empowered and engaged throughout their time in higher education and in all aspects of the process of higher education. SEDA would like the criteria to move away from a consumer model, where learning [Y1] is 'provided' by the HEI and 'consumed' by the student. The criteria as they stand could have this focus, but they would need to be re-written to position centrally the concepts of creativity, the active partnership of student and institution and the developmental process of change. They would then be fit for purpose.

SEDA suggests that there is a disconnect between the suggested evidence and the criteria proposed. The criteria need to be evidence-informed, drawing on the scholarship of teaching and learning, thus grounding them in research findings. The criteria must foreground innovation, as this is key to the global reputation of UK HE. To reiterate: the current criteria implicitly promote a very passive role for the student: a Teaching Excellence Framework needs greater emphasis on the quality of learning and the engagement required to achieve it.

SEDA also questions the proposed data: currently this seems to be biased towards quantitative data, based on a positivist epistemology, whereas the triangulation of qualitative data with quantitative is certainly of more benefit in this developmental process e.g. TESTA (Transforming the Experience of Students Through Assessment) is being used extensively across the HE sector, both at home and international, and is premised on the triangulation of data from audits, questionnaires and focus groups to identify and inform areas of development and enhancement. SEDA would like to underline that the contextual document, which is to be provided by HEIs is of crucial importance: proper contextualisation is key, as the quantitative metrics are developmentally meaningless in isolation from this.

SEDA would like to reiterate forcefully that the aim of teaching in higher education is learning, not satisfaction. To link satisfaction with quality and associated fees, is deeply problematic and will inevitably stymie creativity and innovation. This may result in academics teaching 'safely' and students avoiding risks in their learning and assessments. This is anathema to the true aims of higher education. There should, therefore, be a move away from measures of student satisfaction (which is not a proxy for quality) to measures of engagement. UKES or NSSE data would be fitter for the purpose than the NSS.

A key focus which SEDA feels is missing is that of developmental practice. The current proposals focus on measuring performance at certain points in time, but development and change are not priorities. SEDA would like to see a focus on how institutions are using the data to take steps to improve rather than merely commenting on data sets. This process should not be about taking snapshots; the 3-year period needs to show improvement annually, in addition to the 3-year averages, if they are to be maintained.

In the same vein, institutional investment in and encouragement for continuing development both of staff and policies should be included to underline the institutional commitment to on-going improvements and enhancements. One example of this is the CPD schemes in place for academics and those in academic-related positions, including those leading to qualifications recognised by HESA. Such a dataset would be highly relevant to the TEF metrics and is much more closely related to teaching excellence than, say, employment.

The UKPSF has been in place since 2004 as a benchmark, against which to measure teaching performance. SEDA was fully involved in the development of the UKPSF along with GuildHE, Universities UK, the NUS, HEFCE amongst others. Although SEDA does not regard the UKPSF as without fault, it has had a significant impact on teaching and learning across higher education. It should, therefore, play a central role within the final TEF documentation as a source of evidence that institutions' staff have reflected against.

In addition to actual teaching qualifications, a focus on identifying developmental schemes of peer observation of teaching, rather than an OFSTED type approach of grading and judging is of paramount importance. Assessors must be trained fully to look beyond the actual teaching sessions and include a focus on the ethos and culture around opportunities for staff to engage in development.

#### Aspect 2: Learning Environment

The first criterion in this section centring on the effectiveness of learning resources is reductive, positioning HEIs and academics as being the creators of the learning experience and ignoring the active role of the students. Students must be seen as part of this developmental process. This is an area in which SEDA could contribute significantly. SEDA's strengths are in working with institutions, other national association/bodies and students towards the enhancement of learning in all contexts.

The proposed use of individualised feedback and opportunities for students to reflect and enhance their performances autonomously and independently is admirable. However, evidence from scholarship on effective learning environments and cultures is absent from the criteria and proposed evidence. SEDA would

like to see, for instance, a focus on student partnership and peer assisted student learning and support. Schemes in place to facilitate such approaches contribute an added dimension and significant richness to the student learning environment.

### Aspect 3: Student Outcomes and Learning Gain

The Employment metric is particularly concerning: A six-month post-graduation data point is too short; this should be at least 12 months - 3 years.

Contextualisation is key: regional factors (e.g. incomes in the North East are lower than London; graduates in London face more competition from those moving into London), disciplines and professional issues (e.g. job markets for arts graduates are very different to those for Medicine). This must be taken into account and SEDA is anxious about how this will be achieved. If the focus were on employability outcomes rather than employment per se, e.g. graduate attributes, this would be more fitting and equitable.

SEDA also expects that some of the current measures will be removed in due course and replaced by much richer, more relevant metrics, for example, data around learning gain (funded by HEFCE) and Learning Analytics (being led by JISC). SEDA would like to commend these works, which could result in more informative data for measuring the quality of learning and teaching.

**Q2:** -

**Q2a:**

SEDA recommends that a highly skilled employment metric is not part of the TEF.

Ultimately this metric is the most problematic of the three, as there is no relationship within the evidence that teaching excellence (however perceived) results in highly skilled employment. In fact, HEPI showed that highly paid employment was more related to parental income than institution creating a 10% premium.

The definition of what is considered 'highly-skilled' is also problematic and dependent to some extent on personal interpretation. Some graduates may actively decide not to enter the established 'highly skilled' sectors and this is certainly no failure: it is a conscious choice, perhaps based on wanting to go into the charity sector, etc. What is classed as a highly skilled graduate job is biased against certain types of work, especially public service, charities, the arts and the caring professions and this will undermine the significant achievements of many institutions. This proposed metric would not acknowledge the satisfaction of people with their post-HE jobs that are not encompassed by this description and fails to acknowledge that highly skilled employment is not always the motivator for attending university.

Highly skilled/highly paid employment is not a measurement of learning but instead (as seen in the recent HEPI Report), is predicted much more reliably by family income.

TEF does not include lifelong and life-wide learning. This is a major omission and should certainly be included. Many students go to university for the simple joy of learning, not because it has a certain, specific outcome. This must be taken into account and post-graduation engagements, courses and CPD would also create an interesting reflection on the benefit of the learning experienced previously.

It would be important to see more of a focus on metrics that reflect the graduates' autonomy and career choices, such as contributions to society, charity/volunteering, self determination and potentially reference to the happiness index, for example. Many different employment metrics could be included but few could be deemed 'teaching excellence' related with knowledge of the literature and evidence.

No

No

#### Question 2 further detail:

b) See answer 2. a). In addition, the SOC is historical, outdated, lacking contextual data and open to interpretation.

c) No - there are clearly graduates where their inclusion does not acknowledge other contextually important data e.g. carers, retired people etc.

**Q3:** -

Yes

Yes

#### Question 3 further detail:

3. a) Yes, with reservations.

A proviso, however, is that benchmarks need to remain fluid. If they become too rigid, they become meaningless, as they do not reflect changes in context and circumstance. SEDA suggests that POLAR quintiles may be effective here and that benchmarking should be used more broadly.

HE has been benchmarking for years but this has not been used effectively to change HE. SEDA questions whether the TEF is going to disrupt the existing model. The NSS has had some impact, in that it has encouraged certain HEIs to take different approaches to teaching and supporting learning and provides some evidence to make changes and create further investment in the learning experiences of students. This does not seem to have any discernible impact on the league table rankings but hopefully, the TEF will create a greater disruption that will lead to real engagement in activities that will improve learning experiences.

3. b) Both pros and cons that can be anticipated.

### Consultation Questions (page 2 of 4)

**Q4: Do you agree that TEF metrics should be averaged over the most recent three years of available data?**

Not sure

**Question 4 further detail:**

Our main reservation is that to scrutinise the data from the last three years, immediately positions the process in the past. As such it will become a retrospective benchmarking exercise and significant time will be needed before changes are seen in the results. SEDA's proposal is that this should be an annual process to allow for changes to be seen in a more timely manner. This will, however, necessitate a quick and efficient update of data.

**Q5: Do you agree the metrics should be split by the characteristics proposed?**

Yes

**Q5 further detail:**

SEDA agrees with the proposal of certain key characteristics, however, there are omissions in the categories that could skew results and/or not provide a sufficiently detailed picture of which factors have the most impact on outcomes. We propose the inclusion of on-campus and off-campus students, as this split has a significant and well-recognised impact on performance and outcome, which may not be picked up through the other categories. There needs to be flexibility and granularity for instances when these characteristics do not apply and it is important to recognise and record intersectionalities. A further suggestion is to include all protected characteristics rather than to prioritise a selection. If the decision is to use a selection rather than the whole range, a clear rationale should be provided for clarity.

**Q6: Do you agree with the contextual information that will be used to support TEF assessments proposed?**

Yes

**Question 6 further detail:**

The use of data sets, such as POLAR statistics, can be helpful as they can add more context to the data being examined. Taking the answer to question 5 into account, SEDA would like data collection to be a dynamic process but would like to caution against placing too much data burden on HE institutions.

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**Q7: -**

Yes

Yes

**Question 7 further detail:**

7. a) It is vital to recognise the importance of properly evaluated, continually improving provision as provided and evidenced by good educational development units in HEIs. A dynamic teaching, learning and assessment strategy is a good piece of evidence and SEDA would like to see this included in submissions. A strong suggestion would be that each TEF panel should include an educational development expert, as these colleagues have expertise and experience in making judgements about the quality of teaching, both in their own institutions and more widely as expert assessors for PG Certificates in HE and UKPSF CPD schemes, in others.

SEDA suggests that a submission template would be helpful for both institutions and panels to suppress the likelihood of a 'hidden template' evolving over time. This would disadvantage a number of institutions and make the consistency of judgements through this process very difficult. SEDA suggests an indicative list of evidence but this must be carefully drafted so that it does not become a list of requirements. Again, this is an area in which SEDA already has significant experience and expertise and would be keen to work with BIS and HEFCE in drafting a template for institutional use with input from our fellow colleagues (in HEDG, ALT and PFHEA). A key criterion of 'institutional culture recognises excellent teaching' should be included. SEDA is perfectly placed to work with universities to support them in a proper contextualisation of the metrics.

7. b) To limit submissions is wise and 15 pages seem reasonable. It would be interesting, however, to know what evidence generated this number – a mock submission, perhaps? It is imperative that the 'journey' of the HEI is foregrounded in this document: an HEI on the move is far preferable to a complacent institution that is unaware of its strengths and areas for improvement and development and, therefore, does not make changes. Stasis is unhealthy for HE (particularly with the movement globally). SEDA suggests the inclusion of evidence such as a strategy for development and enhancement; evaluative evidence of success against such a strategy; the development of courses; a dynamic learning, teaching and assessment strategy and implementation plan and an active continuing professional development policy and culture.

As suggested above, SEDA suggests the use of a template to clarify what is expected in terms of submission: with a short 15-page report. A template is vital to enable assessors to compare institutions with greater facility and less bias. We would be willing to create or contribute to a template for institutional submissions, but would envisage working with other key parties (HEDG, ALT, PFHEA, ALDinHE etc) to refine this. These bodies have been involved in the quality of learning and teaching, nationally and internationally, for many years too and we have the joint expertise to design a template that would underpin the institutional submission very effectively.

**Q8: 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

**Question 8 further detail:**

Yes, in the broad areas. No, in the terminology.

The list in Figure 6 has a retrospective focus. The emphasis is on 'looking back at what has gone' rather than on innovation, creativity and future planned development. In order to minimise this, SEDA suggests a focus on the following as evidence of success and associated evaluation:

- Inclusion of the institutional learning, teaching and assessment strategy and implementation/action plan
- The engagement of an institutional Educational Development Unit: its role, reach and position in the institution
- Evidence of successful investment in educational development and the student learning experience
- Institutional approaches to teaching, including the engagement of students in curriculum design; genuine and embedded partnership with students; authentic and active learning and assessment; the proportion of time spent in collaborative learning versus a delivery approach.
- Institutional assessment and feedback policies, including instances of self, peer and formative assessment and feedback.
- Institutional CPD for academics and those in academic-related roles. Examples of how the institution actively promotes, supports and encourages individuals who excel in educational leadership as well as teaching excellence should be included.
- Evidence of institutional support for and encouragement of professional recognition, such as Fellowship of SEDA, engagement with the SEDA-PDF and engagement with the HEA Fellowship scheme.

SEDA would like to highlight the potential pitfall of teaching intensity. This must not be seen as an increase in contact hours as a main aim of HE is to develop autonomous learners, not learners dependent on the academics and traditional transmissive teaching. Additional elements such as peer-assisted learning, peer review, and peer assessment must be included to avoid spoon-feeding students to demonstrate teaching intensity for the purposes of the TEF.

Care must be taken to ensure that this does not become an exercise on generating activities to count as evidence. The focus must remain on the enhancement of learning, not gaming the system. In practice, the proposed TEF is more likely to encourage institutions to retrench with tried and tested (often mediocre) methods likely to be preferred over innovation and creativity which often requires more substantial changes to the educational culture of an institution and involves some risk.

**Q9:** -

Yes

Yes

**Question 9 further detail:**

9. a) Yes but with reservations. SEDA may support one commendation, if there were just two level ratings in the TEF: 'Meets Expectations' and 'Exceeds Expectations', instead of the proposed OFSTED style three which are poorly worded and structured and will be difficult to justify the differences between the different ratings. With just two ratings a commendation allows recognition of a specific strength.

9. b) Yes, to some extent. The impact or influence of these must be evidenced in the narrative of the submission and they must not be anticipatory. Research alone would not be evidence for a commendation; claims that research enhances the student learning must instead be evidenced in the form of research-led teaching that involves the students actively.

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**Q10: Do you agree with the assessment process proposed?**

Yes

**Question 10 further detail:**

Representation on the TEF panel is of concern. We recommend a SEDA presence, or, at the very least, an educational developer on each panel. Specialists, as suggested in this consultation document, are not necessarily people with a deep knowledge of teaching and learning. They have expertise in other areas, in particular, their discipline and research, but the educational development community is concerned with the quality and enhancement of teaching and learning on a daily basis. Educational Developers need to be present on each panel to ensure the focus remains fully on the quality of teaching and learning.

It is of vital importance to reassure the sector that assessors will be able to come to robust, considered decisions. For this to happen the sector needs to see and be consulted on the standards for the criteria, as these apply to assessors' judgements on the additional institutional evidence. One major concern is that the very tight timescale will put pressure on assessors to make quick decisions rather than considered ones.

**Q11: 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?**

Not sure

**Question 11 further detail:**

This seems particularly harsh for new providers, but if all providers in the sector will be monitored annually due to annual collection of the core metrics (as they will be produced annually anyway) there seems little sense in the award being for varying periods. It would make some sense to ensure it is consistent for all providers and if appropriate data metrics dropped significantly it could trigger an action unless the drop was planned/anticipated? There are pros and cons that are clearly evident and the balance between ensuring great learning experiences and avoiding unnecessary bureaucracy and institutional costs (time and money). Such costs should, as far as possible, be invested in the student learning experience and environment.

**Q12: Do you agree with the descriptions of the different TEF award ratings proposed in Figure 9?**

No

**Question 12 further detail:**

SEDA does not agree with the descriptions of the different TEF ratings or the different ratings themselves. The difference between excellent and outstanding as applied to teaching has not been explained with any clarity. In addition, in a 'Teaching Excellence Framework' it is unclear how the final category can be more than 'excellent'. To re-iterate, SEDA would support one commendation, and just two level ratings in the TEF: 'Meets Expectations' and 'Exceeds Expectations', where said expectations are more clearly defined than they are now and are publicly transparent.

SEDA cautions that it will be challenging to ensure that HEIs do not begin to 'game' the system, for example, eschewing pedagogic approaches that challenge the students or entail risk-taking and therefore may result in lower student satisfaction. Students often want 'guaranteed' results, which has never been an aim of higher education and is anathema to a dynamic and stimulating learning environment. It is incumbent on those who design the assessment that this is taken into account and that the focus must remain on learning and teaching and the driving up of the quality of learning and teaching in higher education. An associated concern is that the very largest HEIs may find it harder to get the 'outstanding' and 'excellent' grades than smaller, specialist institutions as a result of bias of disciplinary bias.

It is imperative that equal consideration is given to metrics and the contextual document and the sector will need to be assured that this is the case. SEDA questions the impact that institutional and/or disciplinary bias may have on the decision-making process. Unconscious bias is a well-researched phenomenon and certainly applicable to the TEF decision-making process. Perhaps anonymised submissions should be considered.

What will contribute most to an award - the quantitative data or the submission and panel? What percentage impact does BIS anticipate each element will have on the final award?