

Consultation on the Teaching Excellence Framework (TEF)

About you

What is your name?

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Are you responding as an individual or on behalf of an organisation?

Organisation

What is the name of your organisation? (If not relevant, please answer 'N/A')

Staff & Educational Development Association (SEDA)

Which of the following best describes you?

Other (please specify):
Representative of the SEDA Executive Committee

Questions relating to all proposals

Are there aspects of the proposals you found unclear? If so, please specify which, and tell us why.

The approach to educational gain is not clear. There is no consistency or agreed definition in use across the sector, therefore, it would be helpful to have a working definition of how this might be measured / evaluated. However, it is not clear that work on learning gain is sufficiently advanced to enable educational gain to be used in the TEF, which is unfortunate.

Expectations around the student submission are also not clear. Although we agree that flexibility is important, it would be helpful to have indications of areas on which to focus.

In your view, are there ways in which the policy intention (see the box 'The purpose of the TEF' on page 12 of the consultation document) could be delivered more efficiently or effectively than proposed here?

The TEF fails to take account of a more holistic view of the value of higher education including, in particular: regulatory terms, the role of the access and participation plans.

Gold, Silver and Bronze are norm referenced, rather than criterion referenced, categories, which is very problematic. The scheme is supposed to be criterion-referenced, but it mostly is not. 'High' and 'very high' are not, we suggest, criteria. Good teaching works - that is, it generates the required learning as described in programme learning outcomes, QAA standards and the Graduate Index. "Leads to good learning" can therefore be used as a criterion, as long as the reference points are made explicit.

The proposed indicators for excellence are very narrowly focussed. We would invite you to consider using IFF Index: <https://www.iffresearch.com/solutions/graduate-index/>, which offers a much more holistic account

Questions relating to specific proposals

Q1. To what extent do you agree with our proposal for provider-level, periodic ratings (proposal 1)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.

Tend to disagree

Comments:

We propose that those awarded a 'requires improvement' (RI) rating should be able to retrieve at any time before the end of the 4-year cycle. We agree that 4 years should be the maximum period of time for which the TEF rating is valid, but would like the opportunity to re-enter earlier. Waiting for 4 years will actually be detrimental to ongoing improvement, by making it less urgent. We would like to see a continual reflection on practice to drive development. This would be possible within a shorter time scale.

Speed of successful resubmission is a further indicator of quality, in that it both shows a commitment to high quality and shows students suffering lower quality education for a shorter period of time.

Q2. To what extent do you agree with our proposal for aspects and features of assessment (proposal 2)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.

Tend to disagree

Comments:

As an organisation for colleagues across the sector who lead and support educational change, we welcome the inclusion of academic staff development as a feature of excellence. Engagement in ongoing professional development and the ability to be agile and flexible to change are a hallmark of expertise for teaching in higher education (King, 2022), and provision for this and an embedded culture of professional learning should be a visible feature of any institution claiming excellence.

However, we are less comfortable with other aspects. Overall, the features fail to take account of the diverse range of providers and metrics that may be used in the assessment of excellence. The metrics proposed are blunt tools and very approximate proxies for teaching excellence. For example, the NSS is problematic as it is not undertaken by all institutions, and certain disciplines always fare better, so using the NSS does not provide a fair comparison. In addition, the student evidence is potentially problematic in that it will be very difficult to guarantee that it is independent.

A more fundamental problem with NSS, and indeed with TEF, is that it seeks to concentrate on teaching. Teaching isn't the point. Learning is the point. Outcome measures are therefore more appropriate as indicators of the quality of the teaching than are, for example, student views of the quality of teaching. We make a similar point below (Q.14): As it stands, this is not a Teaching Excellence Framework - it is more like a Student Experience Framework.

Q3. To what extent do you agree with our proposal for the rating scheme (proposal 3)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.

Strongly disagree

Comments:

First, the documentation needs to be clear that there aren't 3 ratings: there are four. RI is a rating. We would propose moving away from Gold/Silver/Bronze, as this has been shown to be a disincentive for some students to apply for certain universities. Some minority students will not apply for Gold-rated institutions, as they do not see that they merit this.

One good option would be to move towards star ratings e.g. 5 * instead of Gold, etc.

We should note that the language about excellence has become inflated. The baseline, surely, is competence. So, as an alternative, Bronze might become competent or capable, Silver meritorious and Gold excellent, or similar terms. Accepting that such terms are labels, not criteria. "Requires improvement" fits neatly into this scale.

Q4. To what extent do you agree with our proposal for where there is an absence of excellence (proposal 4)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.

Tend to agree

Comments:

We acknowledged the need for such a category. However we are concerned about the implications and outcomes for anyone in the RI category, and would like to be reassured that the TEF does not become a mechanism for closing universities through the back door. 'Requires improvement' must not come to mean 'requires closure'. If this were to happen it would rapidly bring TEF into disrepute.

Also, it is disingenuous to suggest that laypeople will perceive a Bronze rating as denoting excellence. Suggestions for more appropriate labelling were made above in section 5.

Q5. To what extent do you agree with our proposal for provider eligibility (proposal 5)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.

Strongly agree

Q6. To what extent do you agree with our proposal for courses in scope (proposal 6)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.

Strongly agree

Comments:

We agree that the lead partner should be accountable for those to whom provision is sub-contracted

We would encourage the OfS to begin looking at PGT programmes for the next iteration of the TEF, given the continuing growth of taught Masters programmes.

Q7. To what extent do you agree with our proposal for provider submissions (proposal 7)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.

Tend to agree

Comments:

However, the burden of this work on providers should be considered in the context of the large number of other regulatory requirements. Furthermore, it should be clearer what role the provider submission plays, alongside other bases for judgement. We would encourage the provision of templates, exemplars, etc to frame the evidence effectively so that it can readily be judged in relation to the criteria.

Q8. To what extent do you agree with our proposal for student submissions (proposal 8)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.

Tend to disagree

Comments:

Greater clarity is needed on the data students are expected to use, if any. There is considerable ambiguity about centrality of the student submission. It is positioned as optional, but doesn't seem to be so. We feel strongly that it is either part of the institutional submission or mandatory.

We would like to see more robust measures in place to ensure that this submission is independent.

We feel that students involved should have completed their UG programme at the institutions, or be in the final year of their studies in order to have developed real knowledge and understanding of the institution and its provision.

Q9. To what extent do you agree with our proposal for indicators (proposal 9)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.

Strongly disagree

Comments:

The NSS should not be used as a standalone measure. The significant evidence base on the differentiated responses of students studying in London demonstrate this is not fit for purpose.

This is also another significant change in approach, following the recent move away from the NSS. We are aware that not all institutions take part in the NSS. How will this be taken into account?

We feel that the metrics are not sufficiently focussed on teaching, still less on learning.

We propose that HESA returns on staff qualifications and recognition are included in the metrics. This aligns better with teaching quality. UKPSF-aligned qualifications should be part of the parcel of metrics, for example SEDA PDF awards and Advance HE Fellowships could also be used as relevant data.

Q10. To what extent do you agree with our proposal for expert review (proposal 10)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.

Tend to agree

Comments:

We propose that members of professional bodies involved in supporting and enhancing teaching excellence are included in the TEF panels e.g. from SEDA, Advance HE, Heads of Educational Development Group (HEDG), Association for Learning Design in HE (ALDinHE), Jisc and regional networks of educational developers. We would also like to see National Teaching Fellowship (NTF) holders and Principle Fellows of the HEA (PFHEA) involved.

Q11. To what extent do you agree with our proposal for the assessment of evidence (proposal 11)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.

Tend to agree

Comments:

Analysis should include triangulation to make holistic calibrated judgments.

Q12. To what extent do you agree with our proposal for published information (proposal 12)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.

Strongly agree

Comments:

It ensures transparency and openness.

Q13. To what extent do you agree with our proposal for the communication of ratings by providers (proposal 13)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.

Strongly agree

Q14. To what extent do you agree with our proposal for the name of the scheme (proposal 14)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.

Strongly disagree

Comments:

We would prefer a name that captures the focus of this exercise. As it stands, the TEF does not sufficiently focus on teaching and learning, so something like UGLSEF – Undergraduate Student Learning and Experience Framework - would be better. The name needs to show that it is currently for undergraduate provision only.

Q15. To what extent do you agree with our proposal for the timing of the next exercise (proposal 15)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.

Strongly disagree

Comments:

The timing is poor. It gives very little time for detailed preparation, and takes place early in the academic year, when universities are at their busiest. New student sabbatical officers will only recently have taken up their role. We would suggest that the window opens in April 2023 and closes in June 2023.