



Department
for Education



Teaching Excellence Framework: year two and beyond

**Government technical consultation
response**

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Contents

Introduction	4
Scope of the Consultation	4
Consultation Process	5
Linked Documents	6
Summary of responses received and the Government's response	7
Analysis of Responses	7
Responses by Category	7
Main findings from the consultation	7
Overarching Summary	7
Summary of Changes and Decisions	8
Question analysis	10
Question 1 - Criteria	10
Government response	11
Questions 2-5: Metrics	11
Question 2 - Highly Skilled Employment Metric	12
Government response	14
Question 3 - Benchmarks	15
Government response	16
Question 4 – TEF metrics	18
Government response	20
Question 5 – TEF Metrics Splits	20
Government response	22
Question 6 – Contextual Information	23
Government response	24
Question 7 – Provider Submission	25
Government response	26
Question 8 – Additional Evidence	27
Government response	28
Question 9 - Commendations	28
Government response	31

Question 10 – Assessment Process	31
Government response	32
Question 11 – Duration of Awards	33
Government response	34
Question 12 – Rating Descriptions	34
Government response	35
Next steps	38
Future development	38
Annex A: Types of organisations that responded to the consultation	39
Annex B: Further information on metrics	40
Updating the metrics	40
Additional comments on metrics	40
Annex C: Response to the recommendation of the ONS’s review of data sources used for TEF	43

Introduction

1. The [White Paper](#), *Success as a Knowledge Economy: Teaching Excellence, Social Mobility and Student Choice* (May 2016), reiterated the Government's manifesto commitment to introduce a Teaching Excellence Framework (TEF). The TEF will provide clear information to students about where the best provision and outcomes can be found and drive up the standard of teaching across the sector.
2. UK higher education has a justly deserved global reputation for excellence. The TEF will build on the existing high standards we expect of providers, assured through the broader quality assurance system, stretching the best and placing pressure on those with variable quality to improve. The TEF will also help to drive UK productivity by ensuring a better match of graduate skills with the needs of employers and the economy. It will ensure better outcomes for all students, including those from disadvantaged backgrounds.
3. This document responds to the [TEF Technical Consultation \(May 2016\)](#) which put forward detailed proposals for how the TEF will operate in Year Two. It is published alongside and should be read together with the [TEF Year Two Specification](#).

Scope of the Consultation

4. The consultation was relevant to those with an interest in higher education, including statutory and quasi-statutory bodies, higher education providers, representative bodies, students and employers.
5. The consultation applied to the operation of the TEF in **Year Two**, which providers will apply for by January 2017. TEF awards made in Year Two will be published in spring 2017 and will therefore be primarily relevant to the decision-making of the cohort of students applying in autumn 2017 for courses starting in autumn 2018¹ and beyond. Year Two of the TEF will be delivered by HEFCE, working with the QAA, on behalf of the Government.
6. As set out in the Government's White Paper, Year Two of TEF will be a trial year. Outcomes in Year Two will not be associated with differential fee uplifts for providers in England – rather, all those achieving a rating of Bronze or higher will receive the full inflationary uplift. However, these awards will be used from Year Three onwards to inform differentiated fees, unless a provider chooses to re-enter TEF in Year Three or future years to obtain a new award, in which case the latest TEF award will be used.
7. The Government is committed to ensuring that the TEF develops iteratively and, as stated in our White Paper, we will continue to trial and pilot changes to ensure that the framework continues to improve. Once the Year Two assessments are completed, we

¹ We recognise that not all students will follow a traditional pattern of entry and may apply for courses starting at different times during the academic year.

will be working closely with HEFCE, QAA, the TEF Panel and representatives of the sector about potential improvements for Year Three.

8. We will also be carrying out an extensive process of active engagement with the sector, stakeholder groups and others involved through DfE's TEF governance to design the assessment framework for subject-level TEF, prior to conducting subject level pilots in Year Three. Results of the lessons-learned exercise and the Year Three pilots will be reflected in the implementation of subject-level TEF in Year Four. There will be a further opportunity for providers to apply for provider-level TEF in Year Three before the TEF moves to subject level in Year Four.
9. Higher education is a devolved matter. The Devolved Administrations have confirmed they are content for providers in Wales, Northern Ireland and Scotland to take part in Year Two, should they wish to do so.
10. We have made a number of changes to ensure that providers in these nations can be assessed fairly and on a level playing field with providers in England. These variations are reflected throughout this document and set out in further detail in the [TEF Year Two Specification](#).

Consultation Process

11. The consultation opened on 16 May 2016 and closed on 12 July 2016. A total of 308 responses were received. 120 responses were submitted through Citizen Space the online consultation platform, 187 formal responses were received by email and 1 by post.
12. Throughout this document where quotes are given they are not necessarily given in full due to limited space, although we have sought to reflect balanced input from respondents.
13. In addition to the formal written consultation, a number of consultation events and focus group discussions were held with a range of stakeholders during the consultation period.
14. Around 230 stakeholders attended the 7 national consultation events, with a range of organisations represented including: statutory and quasi statutory bodies, representative bodies and higher education institutions, alternative providers and students (Annex A). Representatives included: vice chancellors, assistant principals, chief executive officers, public affairs/press officers, and policy officers. We also attended a range of other events to have discussions with stakeholders, including Higher Education Policy Institute (HEPI) events and the Higher Education Academy (HEA) PVC Network.
15. During the technical consultation period, consultation events were held in Scotland, Wales and Northern Ireland. These followed the same structure as the other events held in London and Sheffield, but with a focus on how to ensure the TEF could operate

across the UK. In total, there were around 100 attendees across the three Devolved Administrations events, held in Cardiff, Edinburgh and Belfast.

16. Views expressed at all of these stakeholder events were fed into the consultation process and have helped inform the Government response to the consultation.

Linked Documents

17. This document is one of a suite of documents being published setting out the Government response to the Teaching Excellence Framework 'Technical Consultation for Year Two'. These documents are:

- [TEF Year Two Technical Specification](#)
- [Review into the data sources for TEF metrics](#) – A review by the Office for National Statistics of the quality of the data sources used for TEF (see **Annex C** for a summary of the Government's response to the ONS's recommendations).
- [Research into the factors that affect highly skilled employment outcomes](#) – A report of analysis carried out to determine what factors should be included in the benchmarking process for the highly skilled employment metric.

Summary of responses received and the Government's response

Analysis of Responses

18. A total of 308 responses were received via Citizen Space, email and post.
19. Three responses to the consultation were not in a format suitable to upload onto our online platform. Therefore, although these consultation responses have been considered as part of our analysis they are not included in the numerical analysis included in this document.

Responses by Category

20. The 308 responses came from a range of organisations and individuals including higher education providers (comprising 132 higher education institutions (HEIs), 21 alternative providers and 29 further education colleges); 11 individuals including staff and academics working in the HE sector, 3 students; 35 students' unions; and other organisations including representative and professional bodies, businesses/employers, charities, and trade unions. Several respondents submitted additional information or evidence along with their responses.
21. Responses outside of England comprised of four from Northern Ireland, nine from Wales, and twelve from Scotland.

Main findings from the consultation

Overarching Summary

22. On the whole there was broad support for the proposals set out in the Technical Consultation. The focus on teaching excellence, widening participation and putting students at the heart of the system were widely endorsed and there was a strong recurring message on the need to retain high standards and ensure the reforms protect the value of the UK degree and the world class reputation and quality of UK higher education. Findings from the consultation in each area can be found in the analysis section below and in the [TEF Year Two Specification](#).
23. On all but two of the specific questions asked, more respondents supported the proposals than opposed them. However, despite the broad support, in a number of areas some respondents made specific suggestions for changes to the Government proposals or requested clarifications that we have incorporated into the framework. The summary of changes and decisions is set out below.

Summary of Changes and Decisions

Question	Summary of Change or Decision
Q1. Criteria	We have made a number of minor modifications to the criteria to improve clarity and focus.
Q2. Employment Metrics	<p>A&B) We will be incorporating a Highly Skilled Employment and Further Study metric, using employment in Standard Occupational Classification groups 1-3 as a measure of highly skilled employment.</p> <p>A&B) We will be benchmarking this metric by Disability and POLAR, in addition to the benchmarks used in the standard HESA UKPI employment metric.</p> <p>C) The denominator for both employment metrics will include only those in or seeking employment and/or further study, as per the UKPI methodology.</p>
Q3. Benchmarks	<p>A) We will use the benchmarks proposed, in line with the UKPIs.</p> <p>B) We will flag significant differences where the difference between an indicator and the benchmark is at least two standard deviations and at least two percentage points – but will also highlight very significant differences where the difference is more than three standard deviations and percentage points.</p> <p>B) Where a provider’s benchmark is above 97% or below 3% and the indicator above or below benchmark, we will remove the percentage point requirement, to avoid the situation where it would not be possible for some providers to receive flags.</p>
Q4. TEF Metrics	We will, as proposed, average the TEF metrics over three years.
Q5. Metrics Splits	<p>We will add an additional split by sex.</p> <p>In Scotland, Wales and Northern Ireland we will replace POLAR with the appropriate Index of Multiple Deprivation (IMD)</p> <p>In Wales, we will add an additional split for Welsh medium courses.</p>
Q6. Contextual Information	<p>We have made a number of minor clarifications to the language used.</p> <p>We will add an additional piece of information on the number of students studying at home.</p> <p>We will include a short contextual note describing the nature of HE provision in that nation to be read alongside</p>

Question	Summary of Change or Decision
	submissions from providers in that nation.
Q7. Provider Submission	<p>A) We have clarified that incorporating the student voice can add value to a submission and suggested ways in which this may be done.</p> <p>B) We have maintained the proposed approach to the provider submission, including the 15 page limit.</p>
Q8. Additional Evidence	We have made minor changes to the list of additional evidence.
Q9. Commendations	<p>We have decided that the TEF should not issue Commendations in Year Two.</p> <p>We will use the lessons-learned exercise for Year Two to identify where Commendations might be most useful, including considering new areas where appropriate, with a view to possibly introducing Commendations in the future</p>
Q10. Assessment Process	<p>We have provided significantly more information on how assessors will make decisions based on the metrics and additional evidence.</p> <p>We have altered the timetable originally proposed to allow more time for providers to prepare their submission.</p> <p>We have added the ability for a provider to appeal a TEF outcome on the basis of a procedural irregularity.</p>
Q11. Duration of Awards	We will maintain the proposed approach whereby, for providers with fewer than three years of core metrics, the duration of the award should reflect the number of years of core metrics available.
Q12. Level Awards and Descriptors	<p>We have amended the rating names to 'Bronze', 'Silver', and 'Gold'.</p> <p>We have provided more detail on rating descriptors in the TEF Year Two Specification.</p>

Question analysis

24. The TEF Technical Consultation invited comments on 12 questions from the following themes:

- Criteria
- Evidence – metrics
- Evidence – provider submission
- Commendations
- The assessment process
- TEF ratings descriptions

Question 1 - Criteria

Q1 Do you agree with the criteria proposed in Figure 4? Please outline your reasons and suggest any alternatives or additions?

Q1	Percent ²³
Yes	53%
No	16%
Not sure	30%

25. A majority of respondents agreed that the criteria proposed in Figure 4 of the Technical Consultation were broadly acceptable to improve the availability of information and improve teaching quality within higher education. However, respondents required clarification on how the criteria would be applied during assessment and how the criteria would accurately measure teaching quality.

“Many of the criteria for achieving a TEF award laid out in the consultation reflect factors which have the potential to improve information and incentivise higher quality HE provision”. **Competition and Markets Authority**

“We acknowledge that developing criteria in order to adequately capture the multi-faceted aspects of excellent learning and teaching is a challenging task and we are therefore content with the criteria proposed.” **University of Bath**

26. Respondents also welcomed specific aspects of the criteria such as recognition of learning gain and supporting students from disadvantaged backgrounds.

² The percentages are calculated on the number of those who responded to the question

³ Across all the response tables, percentages are rounded and therefore may not total 100

27. The only significant challenge was to the criterion on course standards and assessment. Respondents commenting negatively on this criterion felt that course design and academic standards were the preserve of the quality assurance system rather than the TEF.

“The quality and robustness of course design is a central aspect of the quality code and quality assessment system, including internal institutional quality process and external validation.” UUK

28. There were also concerns that the core metrics were disproportionately focused around young, full-time students and would fail to fully capture the academic experiences of mature and part-time learners.

Government response

29. We have concluded the criteria will remain substantively the same. This supports the findings of the majority of respondents who agreed with them. We have made a number of minor amendments to clarify language and to reflect providers with ‘non-traditional’ students.

30. Whilst we recognise the concerns raised about the potential for duplicating aspects of the quality assurance system (e.g. on course standards and assessment), we believe there is clear room to demonstrate excellence above the baseline. Courses may be more or less employer-relevant, stimulating or cutting-edge and assessment may be more or less stretching and rigorous; whilst still meeting the baseline expectations of the UK Quality Code and Framework for Higher Education Qualifications. The **Assessment Framework section** in the [TEF Year Two specification](#) sets out the final criteria.

Questions 2-5: Metrics

31. Although not explicitly the subject of the consultation, a number of respondents expressed views as to the appropriateness or otherwise of using metrics based on student satisfaction, non-continuation and employment. Further information can be found at Annex B.

Question 2 - Highly Skilled Employment Metric

Q2 A) How should we include a highly skilled employment metric as part of the TEF?

Q2 B) If included as a core metric, should we adopt employment in Standard Occupational Classification (SOC) groups 1-3 as a measure of graduates entering highly skilled jobs?

Q2 C) Do you agree with our proposal to include all graduates in the calculation of the employment/destination metrics?

Q2B	Percent
Yes	41%
No	31%
Not sure	28%

Q2C	Percent
Yes	32%
No	49%
Not sure	19%

32. Responses to questions (2A), (2B) and (2C) were wide-ranging.

33. **2A)** A large number of respondents agreed that highly skilled employment should be adopted as a measure. However, some respondents queried the reliability of a highly skilled employment metric as a proxy for teaching excellence. Additionally some respondents expressed concern that in certain fields, such as creative arts, ‘highly-skilled’ employment was not a common graduate outcome and that this did not reflect teaching quality. Further to this, some respondents said that students may be unlikely to reach ‘highly skilled’ employment after just six months, and as such this time frame may need to be revised.

“UCEM is fully supportive of looking at how the highly skilled employment metric can be included within TEF, particularly as one of the main reasons for students studying with UCEM is to further their career in the built environment...” **University College of Estate Management**

“There is a danger that this will be another crude proxy of teaching excellence. For example, many areas of employment require apparently low-level work experience before graduates can move into ‘highly skilled’ employment. The limited availability of highly-skilled jobs in economically depressed areas of the country will have to be borne in mind.” **Higher Education Academy**

34. **2B)** The majority of respondents who reacted positively felt that employment in Standard Occupational Classification (SOC) groups 1-3 as a measure of highly skilled employment was appropriate, or at the very least was the best measure currently available, noting that SOC groups are not an entirely accurate or representative measure of graduate employment. SOC groups could also be useful to observe the 'return' on educational investment that one could achieve when choosing a higher education provider.

"SOC groups 1-3 are classed as professional employment by HESA and so this would be wholly appropriate. It would not be helpful to have multiple different definitions of graduate level jobs. It should be noted that over time, classifications for graduate jobs will go out of date – some jobs will become graduate level jobs as the skill level required rises." **Universities Scotland**

35. However, those who responded negatively suggested that the SOC groups as they currently stand do not fully reflect the variety of graduate outcomes at present.

"We reiterate our overall concerns about the use of a skilled employment metric. In addition, SOC groups 1-3 may not capture all the jobs that require degree level knowledge and skills (for example, veterinary nursing and finance administration would fall outside this measure)." **University and College Union**

36. **2C)** Many of those who agreed that all graduates should be included in the calculation of the employment/destination metrics felt that all graduates needed to be included in the employment metrics to make the data robust and fair. It was also considered that using all graduates in employment metrics would be the easiest measure to understand and would be the most recognisable to students and employers.

"Yes using all graduates, with breakdowns by gender, ethnicity, social background, disability, etc. is important for painting the overall picture across the country." **Student**

"If you chose to go ahead now then we would support using the most widely recognised and used measure as this will be the easiest to explain and have the best chance of being recognisable to both students and employers. However, clear caveats should be provided regarding the issues around differences in outcome relating to factors other than those accounted for in the benchmarks." **Office for Fair Access**

37. However, those who disagreed felt that including all graduates would cause institutions to be unfairly penalised for student choices out of their control, for example choosing to take time out to travel before working. There was further concern that there would be an incentive for providers to limit their recruitment from student groups who typically have lower levels of graduate employment, such as those with caring responsibilities or in ill health.

“We think it would be unfair to include all graduates, rather than the denominator used elsewhere. This would penalise institutions based on whether their students chose to travel before work – which seems a perverse move. It also adversely affects institutions if their graduates are in ill health, or if they have a higher proportion of mature students or students with parental or caring responsibilities – all of which have perverse equality implications.” **Oxford University Student Union**

Government response

38. 2A and B) We have decided to retain the highly skilled employment proposals set out in the Technical Consultation. We will include the proportion of graduates in highly skilled employment (as measured by [Standard Occupational Classification](#) (SOC) groups 1-3) or further study 6 months after graduation as a measure of student outcomes.
39. Most respondents agreed that a measure of highly skilled employment or further study would be appropriate. We believe that highly skilled employment is an important addition to our proxy measures of teaching quality alongside the other metrics. We further believe, as did many of those who responded, that SOC 1-3 remains the best option for defining highly skilled employment currently available and accept that some providers will wish to provide additional evidence where SOC does not reflect the positive employment outcomes for their students. The ONS intends to update SOC in the second or third quarter of 2020.
40. We recognise that to fairly reflect the quality of teaching at the provider, a highly skilled employment and further study metric will need to be benchmarked to ensure it takes account of the students taught by that provider. Following a detailed study⁴ we have decided to benchmark the metric by POLAR and disability, in addition to the benchmarks used for the employment or further study metric (Subject of Study, Entry Qualifications, Age on Entry, Ethnicity and Sex). This will ensure that providers are not penalised for offering certain courses, or for taking on students from disadvantaged areas or with characteristics associated with less successful outcomes.
41. 2C) We have decided to accept the arguments put forward by the majority of respondents who disagreed with the proposed approach for calculating employment or further study indicators. Therefore in a change from our proposed approach, employment/destination rates will be consistent with the current UKPI approach, omitting the ‘other’ activity category from their calculation. However, we recognise that at present the data available to students could be confusing, as there is no single definition for employment rates in the sector (the UKPI version is different to UniStats for example), and we will work with HEFCE, HESA and the wider sector to address

⁴ [Teaching Excellence Framework: Analysis of highly skilled employment outcomes](#)

this for TEF Year Three and beyond. This will be particularly important given the development of the Longitudinal Education Outcomes dataset (LEO) and its intended use in future years of TEF. See the **Contextual data and metrics section** in the TEF Year Two specification for further information.

Question 3 - Benchmarks

Q3 A) Do you agree with the proposed approach for setting benchmarks?

Q3 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)?

Q3A	Percent
Yes	51%
No	26%
Not sure	23%

Q3B	Percent
Yes	46%
No	29%
Not sure	25%

42. Responses to questions (3A) and (3B) were wide-ranging.

43. 3A) A majority of the respondents agreed with the proposals for setting benchmarks, in particular the need to remain consistent with the approach used by HESA.

44. There was a recommendation from some respondents; including both those who agreed and disagreed with the proposed approach, to also include an additional location-based benchmark factor. Those respondents believed this would address differences, such as labour market conditions, between the different regions of the UK, POLAR⁵ and the unique conditions of London specifically.

“... It is concerning that location has not been included as a factor for benchmarking; it is the view of LSESU that given the London location of LSE that this will have an impact on performance against satisfaction, non-continuation and employment/destination and yet this is not something within the institutions control.

⁵ POLAR (the Participation of Local Areas classification) looks at how likely young people are to participate in higher education across the UK and shows how this varies by area. For further information see [POLAR – Participation of Local Areas](#).

Therefore, location of the institution should be included as a factor for benchmarking.” **LSE Students' Union**

45. Several respondents also noted a lack of clarity and transparency in the method of benchmarking.

“Further information is required on how non-traditional providers will be benchmarked...” **Kaplan**

46. 3B) A majority of respondents agreed with the proposed approach for flagging significant differences between indicator and benchmark. Those who agreed pointed out the importance of using a method that provided sufficient differentiation between providers. However, there were some who suggested changes to the proposed methodology, saying that any approach to flagging significant differences should also be consistent with HESA methodologies.

“We agree to the principles of flagging significant difference using the benchmarks. The reduction to c. 2 standard deviations is necessary in order to achieve some distinction, which is not available using the 3sd methodology.” **University of Reading**

“The proposal for setting benchmarks is to use the methodology derived by HESA for their KPIs. While this methodology has been in existence for some years it is not transparent to institutions. To this end the fitness for purpose of the methodology for this exercise has not been established or open to public scrutiny. There needs to be far more transparency around the methodology for setting benchmarks to enable the approach to be assessed.” **University of Kent**

“The benchmarking approach should be consistent with that developed over a long period for the UKPI system, and revised in line with that system. In addition, we would support the inclusion of geographic differences into the benchmarks.” **University Alliance**

Government response

47. **3A)** We conclude that this proposal should stand; metrics will be benchmarked using the HESA approach and the existing factors.
48. We have adopted the UKPI approach to benchmarking. We recognise that not all providers are familiar with the methodology. The [TEF Year Two Specification](#) sets out the basic methodology and provides links to the more detailed methodology published by HESA. HEFCE will supply providers (as they did for the illustrative data) with a breakdown that will allow providers to see how their benchmarks were derived.
49. Although most respondents agreed with the proposed factors for setting benchmarks, amongst both those who agreed and those who disagreed, there were several suggestions for additional factors which could improve the benchmarks. The most

frequent requests were for location of provider and / or domicile of student (region) and a measure of social disadvantage (e.g. POLAR).

50. Within the UKPI methodology, not all factors that impact on the measure of interest are automatically included in the benchmark. Potential factors have to be associated with what is being measured; vary significantly from one HE provider to another; and not be in the HE providers' control, and so not be part of their performance.
51. In addition, it may not be appropriate to include factors that are closely related to one another (this would reduce the efficiency of the method) or which increase the level of "self-benchmarking"⁶. Finally, the UKPI steering group is currently undertaking a review of its benchmarking methodology, due to report later this year. It is in this context that we have considered suggestions for additional factors.
52. We considered the proposal to include region to control for any differences that might exist in the labour market conditions where an HE provider is based. However, we believe that doing so could have a number of disadvantages. While some providers may be very focused on supplying higher skills into their local community, for many they act as a very important supplier to the national labour market and discouraging providers and students from having a UK wide view of employment options could be detrimental to both social mobility and the economy. There are also technical issues. If region is intended to reflect differences in local employment opportunities, then a measure based on government office regions would not be sensitive enough to account for big differences within regions, but to focus on smaller geographic area would significantly increase the risk of self-benchmarking (a university effectively being compared with itself). Amongst respondents proposing region there did not appear to be a clear consensus on how this would be measured, with views split across a measure based on the provider location, student domicile and student destination.
53. We have included POLAR as a benchmarking factor for the highly skilled employment metric, but not for the other metrics used in TEF Year Two. This is because there already exists a benchmarking methodology for these metrics and we felt it more appropriate to maintain consistency with the approach adopted for the UKPIs. However, the benchmarking approach used for UKPIs is currently under review and so this decision will be revisited in light of its conclusions. For TEF Year Two the panel will be able to assess any differences in results for students at different ends of the POLAR scale, as POLAR will be included in the list of splits and the contextual data⁷.

⁶ Self-benchmarking is a term used to explain the undesirable scenario in which the students in the providers comparison group are disproportionately drawn from the provider itself. For example, if all the students studying physics were registered with a single provider, and subject were a factor, then the entire reference group would be drawn from that provider, making the benchmark meaningless

⁷ In providers from England. Providers in Scotland, Wales and Northern Ireland will have their data split by the appropriate Index of Multiple Deprivation

54. **3B)** We conclude that this proposal will stand. Metrics will be flagged as significant if they are significantly (at least 2 standard deviations) and materially (at least 2 percentage points) different from benchmark. Two standard deviations represents a 95% confidence interval. We believe that there is good differentiation between providers and that 95% confidence in a metric is sufficient, given that the use of such an interval is commonplace in many social science disciplines and that a provider's TEF rating will also depend on the evidence provided in its qualitative submission.
55. In response to the concerns raised in the consultation responses we are making some changes to the way that the data will be presented to assessors. Metrics will also be flagged when they are very positive or very negative based on them being at least 3 standard deviations and 3 percentage points different from their benchmark.
56. To ensure that there are not cases in which it would be impossible for a provider to get a flag, where the benchmark is above 97% (or below 3% in the case of the non-continuation metric) and the provider's indicator is above the benchmark, the materiality test will not apply and metrics will only have to meet the significance test in order to be flagged. This is because it would otherwise be impossible for some providers to be flagged as very positive as it is not possible to achieve a result of over 100% (or below 0% in the case of non-continuation).
57. See the **Contextual data and metrics** section in the [TEF Year Two specification](#) for further information.

Question 4 – TEF metrics

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

Q4	Percent
Yes	68%
No	11%
Not sure	21%

58. A majority of respondents welcomed the averaging of the TEF metrics over the most recent three years of available data, as three years' data would provide a more 'stable' view of providers' performance than a single year of data.

"This provides a fair and equitable outline and increases the statistical significance of variances from the benchmarks and provides a more stable view of the provider's performance over a period of time than would a single year's data". Navitas UK Holding Ltd

59. Furthermore a three-year average could encourage and reward consistent performance. Additionally there were a number of respondents who suggested a weighted average approach.

“Whilst we concur that 3 years is sufficient as a time period, we think a weighted average, for example 50% (for most recent), plus 30%, plus 20% (for oldest) would provide a more appropriate representation of the direction of travel. Greater emphasis should be given to more recent data that will reflect the changes institutions are making towards attaining the higher award levels.” **University of Greenwich**

60. There were a small number of responses which suggested larger institutions would prefer a five-year average which would provide a more representative overall picture of their quality. Some alternative providers recommended that a two- year average may be more appropriate as it may give providers more incentive to drive improvements.

“We would prefer to see outcomes averaged over five academic years instead of the current emphasis at most HEIs of three years as this does not cover a full undergraduate lifecycle from recruitment to graduation. Account must also be taken of students on four year programmes including those taking a ‘sandwich’ year out.” **Association of National Teaching Fellows**

“...we do not believe that data from student surveys conducted three years’ ago (which in turn represent the views of students who entered the College more than six years’ ago), is representative of our current provision or the student experience we will be providing to students who enter in academic year 2018/19. We therefore request that independent providers be given the option to use an average from two years’ worth of data, or to use one year’s worth of data, where a case can be made as to why a three-year average would not be representative of current performance.” **GSM London**

61. Some respondents also argued that a three-year average could negatively impact on new providers who would not have datasets available for the previous three years. Similarly smaller institutions and their smaller datasets would not be comparable with large institutions.

“When using averages in any metrics there needs to be a recognition that there are small numbers of HE students at some institutions and percentages are not comparable against benchmarks that are based on large numbers.” **New College Durham**

62. There was also a general concern from all types of respondents that averaging the data could mask any important changes and this would not be recognised by applicants or assessors. A three-year average could also mean that the data included in the average may be outdated and not relevant to teaching standards at present.

“This will almost certainly discriminate against alternative providers, when the stated Government aim is to level the playing field and encourage wider competition. Averages may disguise important changes in the data that are then not recognised as a change in teaching standards. Finally, data used in the average could be up to 5 years old for a TEF submission and therefore not pertinent to the current teaching and learning within the institution.” **The London Centre of Contemporary Music**

Government response

63. After consideration, we have decided that this proposal will stand; TEF metrics will be averaged over the most recent three years of available data. Of the options considered, this approach is the most likely to ensure that small providers are not disadvantaged. In using multiple years of data we have balanced the benefits of using aggregated data (more providers will have a full set of reportable metrics, reducing volatility in metrics outcomes) against the desire to use the most recently available data. Where reportable, the metrics data will also include the flags for each of the three contributing years.
64. We believe that this will give a clearer and more consistent view of metric performance than adopting a weighting approach as suggested by some respondents. Weighting, particularly for small populations could result in too much emphasis being placed on a specific year’s data or a very small number of students. We think that this approach leaves space for providers to innovate, without the risk that a short term impact on metrics data would dictate a TEF award. See the **Contextual data and Metrics section** in the [TEF Year Two Specification](#) for further information.

Question 5 – TEF Metrics Splits

Q5 Do you agree the metrics should be split by the characteristics proposed? Please outline your reasons and suggest alternatives.

Q5	Percent
Yes	61%
No	17%
Not sure	22%

65. A majority of respondents agreed that the metrics should be split by the characteristics proposed, which would help identify any significant differences between student groups.

“TEF is about making choices and this will provide students with these characteristics’ more information and detailed understanding of the institution and infrastructure and support available.” **Bromley College**

66. There was some concern that datasets would not be large enough to be statistically significant, which could lead to small cohorts of data, which questions the validity of the data after it has been split by the characteristics proposed.

“We believe the current threshold of 10 responses to be reportable is too low to draw any significant conclusions from and would therefore recommend that it be raised.”
University of Essex

67. A small number of respondents stressed concern over the impact of the characteristics split on those students from disadvantaged backgrounds, or disabilities, and implied that institutions may be looked upon negatively if these students could not achieve the same graduate outcomes as students from a more advantageous background.

“This seems severely skewed against those institutions who take the most students from disadvantaged backgrounds. The document makes it clear that the institutions will be seen to be failing if students from disadvantaged backgrounds do not do as well as those from advantaged backgrounds – it attributes this to ‘differences in the quality of teaching and learning experienced by different student groups’, and completely ignores the impact of disadvantage in terms of the external pressures placed on students.” **University of Huddersfield**

68. In contrast there were some respondents who wished to see a disaggregation of the ‘disability’ characteristic, as it was felt that the impacts of learning disabilities versus physical disabilities could not be generalised within a singular term. Furthermore, there were a large number of respondents who wished to see a ‘gender’ characteristic.

“We do agree in splitting the metrics, but are concerned that the Disability metric in particular is binary. At SAE a proportion of our students are classified as having some degree of mental health challenges when they apply including Asperger’s syndrome and Autism. It is not clear, how the metric interpret this or make it clear to users of the data.” **SAE Institute**

“We strongly believe that gender should be added to the list of characteristics. This is a significant omission, particularly given recent commentary on the imbalance between the participation of male versus female students in higher education. This would also be more significant in specific subject areas.” **University of Liverpool**

69. A variety of types of respondents recommended that the Black and Minority Ethnic (BME) category needed to be split, possibly between UK students and international

students, recognising that this group would have differing experiences of higher education.

“In the category of Black and Ethnic Minority it is extremely important for there to be a differentiation between UK students and INTERNATIONAL students as they have very different experiences and levels of satisfaction that are not currently being recognized by the NSS.” Lecturer

70. Providers, especially from London and the Devolved Administrations expressed concern over the use of POLAR data, citing that the methodologies had high margins of error due to population density and income disparity particularly in large urban areas.

“..It should also be noted that POLAR relates to students under 21 and excludes mature students. Moreover, the use of POLAR is problematic for Scotland, where the Scottish Index of Multiple Deprivation is used instead of POLAR, and in London, where high levels of population density often mask differences in socioeconomic advantage...” UUK

Government response

71. The majority of respondents agreed that the metrics should be split by the following characteristics: Level of Study, Age, POLAR, Ethnicity, Disability, Entry Qualifications and Domicile. We have decided that these proposals will stand as they will allow assessors to confirm that a provider is genuinely delivering positive outcomes for its students from all backgrounds. In addition we will also include Sex, and for those providers in Scotland and Northern Ireland we will replace POLAR with the appropriate Index of Multiple Deprivation (IMD). For providers in Wales we will replace POLAR with Welsh IMD and Communities First and add a split for students whose courses are delivered in Welsh.

72. The benchmarks will be calculated specifically for each split, for example, a provider could have a benchmark of 3.5% for non-continuation then in the Age split have a benchmark of 3.2% for young students and 3.6% for mature students.

73. Split metrics will only be provided where minimum reporting thresholds are met. Any gaps will not be interpreted negatively or positively by assessors and providers do not need to attempt to “fill” gaps through their submission. Providers may wish to provide additional data in their submissions that illustrates good performance. Splits for domicile will only be provided for the three NSS based metrics because non-UK students are excluded from the non-continuation and DLHE based metrics⁸.

⁸ The decision to exclude non-UK students is made to maintain data quality. Non-continuation is calculated on the basis that students leaving a provider have not enrolled elsewhere. For non-UK students, this cannot be derived from HESA data sets. DLHE response rates are much poorer amongst non-UK students.

74. We consider that POLAR is currently the most appropriate proxy for social disadvantage in England, though recognise that no measure is perfect. We have agreed with the Devolved Administrations that alternatives will be used for their providers because they have not adopted POLAR for Widening Participation. Information about POLAR, particularly the “London issue”, will be included in technical guidance produced by HEFCE. Whilst we acknowledge the arguments for providing a finer level of disaggregation in the disability category, the numbers in many of the sub categories are very small and result in unreportable metrics in the majority of cases. This point also applies in relation to those respondents who requested that the metrics be split by multiple categories (e.g. BME category and Domicile). See the **Contextual data and metrics section** in the [TEF Year Two Specification](#) for further information.

Question 6 – Contextual Information

Q6 Do you agree with the contextual information that will be used to support TEF assessments proposed? Please outline your reasons and suggest any alternatives or additions.

Q6	Percent
Yes	72%
No	10%
Not sure	18%

75. A significant majority of respondents welcomed the use of contextual information as both helpful and useful to support TEF assessments although there were some who requested clarification on how the contextual information would be applied during the assessment.

76. Respondents endorsed the recognition of factors which embraced the diversity of institutional objectives and the varying circumstances providers face including regional economies, demographics, and job markets.

“The contextual information will provide assessors and panels with critical detail about the environment in which a provider operates – given the differences in regional economies, demographics and job markets, this is vital to ensure that institutions are not inadvertently penalised for factors outside their control.”

Birmingham City University

77. There was a recommendation from respondents to amend the term ‘grew up’ in Table 1 Paragraph 95 Part B to reflect the student’s current registered location before enrolling with the provider. Respondents found the term found particularly vague and difficult to capture in practice and highlighted the complexity of some students

'growing up' in several regions before higher education or the term not providing accurate information to support mature or part time students.

"Some concern in relation to some of the information which is to be provided by the 'data maps'. There is a question as to how this information is to be defined. For example, how do we classify where students grew up? Is it their home address at point of entry? We are also unsure what level of geographical organisation is being measured (local authority, town, nation, or postcode)." **Federation of learned societies of Politics, International Relations/Studies and European Studies**

78. Additionally the terms 'young' and 'mature' were deemed too vague by some respondents, as they, particularly the latter, neglected the breadth of ages from 21+ students who have different contextual needs. Furthermore a 'gender' characteristic was mentioned again by some providers for students who do not identify as either 'male' or 'female' in the sex category.

79. One suggestion that was raised by a number of respondents was that we include data on the number of students studying at home.

"We agree with the current list of contextual information but feel that it will be worthwhile to take into account the number of enrolments from the local area, or perhaps alternatively the number of students who live at home during their studies. It is known that students living at home will be more likely to be employed in the local community after graduation and this can have a negative impact on employment in graduate level jobs..." **University of Sunderland Students' Union**

80. The Devolved Administrations also wanted to ensure their specific circumstances would be reflected in the additional contextual information to take into account the different approaches in these administrations.

"There would need to be additional specific contextual information for Wales, to take account of the different expectations placed on higher education in Wales, the Welsh language/Welsh medium provision, different types of employers and employment routes, etc. in order to contextualise the data effectively." **Higher Education Funding Council for Wales**

"We strongly recommend that the panel that considers Scottish institutions has a good understanding of and access to additional information about the different degree structure in Scotland, the devolved approach to education in Scotland and the different approach in the Scottish Quality Enhancement Framework. Otherwise there is significant risk that Scottish institutions will be disadvantaged by inappropriate comparisons with institutions outside of Scotland." **University of Dundee**

Government response

81. We have concluded that we will use the contextual information proposed to support the TEF assessments, with some minor alterations. This is in line with the view of the majority of respondents who welcomed the use of contextual information, and, like

them, we consider it is the most reasonable set of data to provide assessors with a clear understanding of the nature of a provider.

82. Specifically, we have clarified the language – as noted by those above (e.g. mature), and we have added an additional data field relating to the number of those staying at home to study, based on [Travel to Work areas](#).
83. We will also work with each of the Devolved Administrations and HEFCE to ensure that information on the national operating context for HE within each country is made available to assessors, so they have a greater appreciation of the contextual circumstances of each provider. See the **Contextual data and metrics** section in the [TEF Year Two Specification](#) for further information.

Question 7 – Provider Submission

Q7 A) Do you agree with the proposed approach for the provider submission?

Q7 B) Do you agree with the proposed 15 page limit?

Q7A	Percent
Yes	57%
No	25%
Not sure	18%

Q7B	Percent
Yes	54%
No	24%
Not sure	22%

84. Responses to questions (7A) and (7B) were wide-ranging.

85. **7A)** The majority of responses were positive and welcomed the proposed approach to provider submissions. However, a small minority believed that a provider submission would make the TEF overly bureaucratic. There was also a strong consensus to see more guidance on provider submissions.

“... Agrees that there should be an opportunity for each provider to submit a narrative statement. TEF assessments should not be based solely on quantitative judgements. The provider submission should be able to include information that demonstrates improvements and trajectories, rather than focusing only on outcomes. Outcomes are very important, but it is also necessary to understand how providers are improving their offer to students – a continual internal cycle of challenge, rigour and enhancement is an important aspect of excellence.” **Million Plus**

86. **7B)** A large proportion of respondents agreed some form of page limit would help to minimise the burden of the process. However, the length of the prescribed page limit was contested; smaller institutions tended to agree more with the 15 page limit, whilst some larger institutions reacted more negatively.

“As a small provider with 500 learners, I would suspect the submission will be researched and written by a single staff member. We will not have the resources or capacity to put together a team. 15 pages is clearly do-able.” Petroc

“A general direction to be concise would be preferable to an arbitrary page limit. We feel the current suggested page limit is not sufficient for HEIs (particularly Scottish HEIs) to fully understand and contextualise their metrics.” Scottish Funding Council

87. One suggestion was for a ‘banded approach’ to page limits, with smaller providers having a smaller page limit, and larger institutions being permitted a longer submission.

“...HEPs submitting to TEF will vary from small single subject institutions with fewer than 100 higher education students, to large and complex multi-disciplinary institutions with tens of thousands of students. Given this a single page limit for all HEPs would not be realistic or appropriate. There should, instead, be a banded approach with the length limit for a provider submission being determined by a proxy for size and complexity (the most obvious candidate being a banding on the basis of student numbers)....” Newcastle University

88. Responses also noted that providers were keen to receive more guidance on the structure and layout of the provider submission. Some respondents felt strongly that the student voice should be given more prominence in the submission, for example by requiring that a student-led submission should be made available alongside a provider submission.

“We feel that the government is wrong to deny any formal opportunity for students and/or student representatives to provide a submission to TEF as part of the provider submission. This appears to be a deliberate prejudice against the involvement of students’ unions, despite the fact that the higher education sector showed overwhelming support for them in the green paper consultation.” NUS

Government response

89. **7A and B)** The responses we received recognised that we had tried to find a balance between asking for a submission that was long and overly bureaucratic and asking for a submission that would have been too short to enable the Panel to reach an informed judgement. Overall, the consensus was that 15 pages is manageable and a reasonable starting point for Year Two. The Government agrees with this view.

90. Having considered various alternatives, we decided that a fixed template would not be appropriate, as this could be overly limiting for some providers, particularly small or specialist institutions, and could also disadvantage those who would prefer to

submit fewer than fifteen pages. We will therefore ask HEFCE to issue guidance as to the type of things and potential structure that a submission might include, whilst being clear that a provider is free to adopt a different approach, to write nothing under one section, to write less than fifteen pages or to submit graphical evidence (for example) and will not be penalised for the approach it decides to take.

91. We recognise the important role that the student voice can play in providing additional information about a provider’s teaching. We do not consider a mandatory student submission is appropriate, as this could disadvantage alternative providers and others without a student union, as well as providers where a student union chose to boycott the TEF, or where the student union was engaged in a political dispute with its provider on a matter unconnected to teaching. However, in the Year Two Specification we have strengthened the guidance in this area to make clear that in many cases presenting the student voice may serve as strong supporting evidence for a provider, as well as suggesting ways that this could be done, which could include, if the provider wishes, allowing student representatives to write part of the submission. See the **Provider submissions section** in the [TEF Year Two Specification](#) for further information.

Question 8 – Additional Evidence

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?

Q8	Percent
Yes	58%
No	14%
Not sure	28%

92. A majority of respondents strongly agreed with the examples of additional evidence included in Figure 6, on the proviso that they did not become prescriptive and that the guidance should stress these are potential examples only. A minority of respondents recommended the list allow for any relevant additional evidence to ensure scope for innovation and creativity, while others were critical of expanding the list further.

“We believe that this needs to be part of the pilot phase. The government should encourage any example of delivery, and allow those providers taking part in the pilot to put forward any evidence they believe supports their claims. Allowing this open approach will ensure the pilot can identify the widest range of examples of diverse delivery and provision.” **Million Plus**

“The more things on the list, the more scope there is for reviewers to give different judgements to different universities on similar types of evidence.” **University of Southampton**

93. The strongest areas of disagreement focused on the references to contact hours and Grade Point Average (GPA), which some respondents considered had no impact on teaching quality.

“The examples need some refinement. The bullet point on grade inflation relates to standards, not quality, and information on contact hours does not necessarily relate to quality, and certainly not to ‘teaching excellence’, which is a different issue. Likewise the relevance of the reference to GPA is unclear: this does not measure the quality of teaching and is not protected from the possibility of grade inflation.”
University of York

Government response

94. The majority of respondents strongly agreed with the examples of additional evidence included in Figure 6. We have concluded that we will use these examples, and in addition we have made some minor changes to the list. These examples will be used to support providers on the proviso that they do not become prescriptive and that the guidance will stress that they are potential examples only and will allow for any relevant additional evidence to ensure scope for innovation and creativity. We believe that both contact hours and GPA do have merit as one method of demonstrating the impact of a provider’s teaching. See the **Provider Submissions** section in the [TEF Year Two Specification](#) for further information.

Question 9 - Commendations

Q9 A) Do you think the TEF should issue Commendations?

Q9 B) If so, do you agree with the areas identified? Please indicate if you have any additional or alternative suggestions for areas that might be covered by commendations.

Q9A	Percent
Yes	55%
No	29%
Not sure	16%

Q9B	Percent
Yes	48%
No	29%
Not sure	23%

95. Responses to questions (9A) and (9B) were wide-ranging.

96. **9A)** In general, the majority of those who responded were in favour of including Commendations in the TEF, agreeing that it shared and celebrated excellence in the sector, allowing greater differentiation within it. Other respondents felt it opened up the sector to highlight innovation and excellence in providers which otherwise would not receive such recognition, showing its diversity.

“The University welcomes the inclusion of commendations in the TEF which gives the opportunity to reflect specific examples of excellence. It also provides an opportunity to share best practice across the sector which has been a highly valued aspect of existing quality assurance processes, and one which should not be lost.” **University of Warwick**

97. However some respondents stated that given the speed of the TEF, adding Commendations would be premature, and that it may be more beneficial to introduce them at a later stage in the TEF timetable.

“...we believe that there is enough to do to introduce TEF2 in the time available without adding further complexity at this stage for BIS/HEFCE, institutions and assessors.” **Harper Adams University**

“Commendations could be considered as a later development in TEF when the panels have built up experience of what they are looking for. It will be a lot to consistently assess the provider submissions without the added complexity of commendations.” **Faculty of Arts and Humanities, University of Sheffield**

98. Most respondents who commented on the matter agreed that Commendations should be available to providers with all three ratings but did not support the idea to restrict them for 5-10% of the sector. Some respondents suggested an un-intended consequence of Commendations could be the over-specialisation of institutions in order to gain one.

“A system of commendations would complicate the TEF assessment, encourage gaming, and promote individual pockets of excellence rather than encouraging providers to consider standards in all areas.” **Individual**

99. **9B)** Whilst some respondents agreed with the areas identified, others disagreed with a pre-determined list if Commendations were to be used, suggesting the areas listed

were too restrictive and that good practice in other areas could potentially merit a Commendation. Many respondents asked for further clarity on what is required to gain a Commendation and how assessors or Panel members would use evidence to form a judgement.

“Bournemouth University supports the use of commendations; however, we do not believe that there should be a set list of restricted categories. Panels should be able to award commendations where appropriate to reflect excellence. We do not believe that there should be any quota attached to these, as this would undermine the value of the commendation.” **Bournemouth University**

100. Of the areas proposed for Commendations, support and reward for staff and positive outcomes for disadvantaged students were particularly welcomed.

“Commendations in principle are a welcome concept, incentivising and recognising HE providers who develop distinctive, high calibre practice. We particularly welcome the proposed commendation for ‘Excellence in the support, reward and recognition available for teaching staff’”. **Teach First**

101. Several respondents also requested the addition of new areas which included a ‘business, enterprise and industry’, a ‘student engagement, and ‘student wellbeing’ Commendation.

“Language used in commendations should be broadened, e.g. Business is narrow, could be discussed in terms of excellence in links with business/industry, public and third sectors.” **University of Strathclyde**

102. Some respondents suggested the ‘research-led teaching’ Commendation needed to be amended to ensure that non-research intensive providers were not disadvantaged. Others also argued that research-led or informed teaching should be broadened to include the impact of scholarship or professional practice. Additionally ‘excellence in the support, reward and recognition available for teaching staff’ should include other staff involved in learning support.

“We need to guard against ‘Excellence in research-led teaching’ being code for ‘research excellence’ - they are different.” **Aston University**

103. A small number of respondents suggested amendments on the language used in Commendations. For example, ‘business engagement’ could be rephrased more positively and broadened to include employer engagement.

“The suggested measures need to be applicable to all institutions and some of the suggested will disadvantage some institutions more than others. Some examples (e.g. achieving positive outcomes for students from disadvantaged backgrounds) will advantage certain types of institutions, while others (e.g. excellence in the support, reward and recognition available for teaching staff) may disadvantage certain sizes of institutions. Excellence in business engagement would be better

phrased as 'employer engagement' or 'industry engagement'". Myerscough College

"... 'Excellence in business engagement' could read 'excellence in business or sector engagement' thus including those providers who engage closely with their relevant employment sectors that may not be purely 'business'. This would be extremely important e.g. for creative arts providers." ICMP Management Limited

Government response

104. We have concluded that the TEF should not issue Commendations in Year Two. This will make the task of the Panel simpler in what is intended to be a trial year, allowing them to focus on the core task of determining providers' TEF ratings.
105. Nonetheless, we believe that Commendations could have a place in a future iteration of TEF. We will use the lessons-learned exercise for Year Two to identify where Commendations might be most useful – including considering whether new areas, such as a Commendation in student engagement, might be appropriate – with a view to possible introduction in a later year.

Question 10 – Assessment Process

Q10 Do you agree with the assessment process proposed?

Q10	Percent
Yes	53%
No	18%
Not sure	29%

106. A large proportion of respondents agreed with the assessment process proposed, but also provided recommendations. Both those who broadly agreed and those who broadly disagreed had comments and suggestions. Respondents raised concerns around the timescale being too short in order to support a robust process, as well as requesting more information on the assessment process itself.
107. Some respondents requested more information on how assessors would use metrics and additional evidence to make a decision. It was felt that this would help in putting together their submission.
108. A small proportion of respondents recommended that there should be an opportunity to appeal the TEF award. Responses particularly focused on a concern that, without an appeals process, providers would be left without an avenue to seek recourse if any aspect of the TEF assessment process was believed to be unfairly/inconsistently managed.

109. Similarly, respondents stated that they would like the assessment process to be reviewed after TEF Year Two, and any changes made accordingly.

“We support the assessment process outlined for year two of the TEF but we consider that it should be thoroughly reviewed thereafter.” **University Alliance**

110. In addition some respondents raised concerns regarding the background and demands placed on TEF assessors in relation to the consistency of assessment. Respondents suggested that assessors should be employed from diverse backgrounds to ensure that they are qualified to make judgements on specialist subjects and the different types of higher education providers that will be assessed.

“It is not clear from the proposals whether there will be any arrangement to ensure that assessors for TEF have a particular familiarity with the kind of HE provision about which they will be making judgements. We do consider that there is a case for ensuring that assessors considering small and specialist conservatoire-type provision in the performing arts have a good prior understanding of that kind of provision, its mission, delivery and associated data.” **Conservatoire for Dance and Drama**

“Yes we agree with the proposed assessment process; however we would like students to be explicitly referenced as being both assessors and panel members to reiterate the commitment to student engagement at all stages of the process.” **GuildHE**

111. A minority of respondents also recommended that the assessment process should be anonymised to avoid reputational or institutional bias when assessing providers.

Government response

112. Most respondents were in general agreement with the assessment process. Following further development work with HEFCE, we have opted to alter the timetable originally proposed to allow for more time for providers to prepare their submission and to allow HEFCE more time to develop their guidance. HEFCE guidance will clarify how they intend to match assessors to applications. We considered whether to anonymise applications and decided that this would be both impractical and ineffectual in a substantial proportion of cases (as many of the assessors would be able to guess the organisation, based on the information provided in their application). We have provided more detail on how the metrics and additional evidence will be used in the [TEF Year Two Specification](#).

113. We have also listened to concerns regarding the lack of an appeals process and have opted to include an appeals process for Year Two. Providers will be able to appeal on the grounds of procedural irregularity.

114. See the **Assessment: decision making** and **Assessment process** sections in the [TEF Year Two Specification](#) for further information.

Question 11 – Duration of Awards

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?

Q11	Percent
Yes	62%
No	22%
Not sure	16%

115. A majority of the responses agreed that for providers with less than three years of core metrics, the duration of the award should reflect the number of years of core metrics available. This would allow providers with less than three years of core metrics to participate.

“For providers that have fewer than 3 years participation in NSS/DLHE/HESA, there appears to be no alternative to the proposed approach. Better to give newer providers the opportunity to receive an award, but for a shorter duration, than to prevent them from participating at all.” **Ravensbourne**

116. Additionally by using a shorter award this could act as an incentive for new providers to improve their performance and not allow for coasting or decline in performance.

“We also hope that imposing a limit on the number of years to the duration of award will act as an incentive for new providers to improve their performance and not allow for coasting or decline in performance, which is not in the interests of students.”

NUS

117. A small number of responses suggested that the proposal was unfair for newer providers and could create additional burden if they felt compelled to include a greater volume of additional evidence in their submissions. However, others felt it would be unfair to have to wait until they had all three years of metrics to apply.

“This discriminates against new institutions and is unfair, adding expense and risk to the innovators the Government should be encouraging.” **New College of**

Humanities

“...The proposal to further burden these typically small providers with additional submissions to TEF exacerbate a process which already advantages large, publicly funded providers... We reiterate our suggestion from our Green Paper response that TEF awards should not require a full re-submission but simply a review when the data is available.” **Independent Higher Education**

Government response

118. We stand by our proposal that those who do not have three full years of metrics should receive a shorter award, to reflect the number of years of core metrics they have available (i.e. if a provider has one year of complete data, the award will last for one year and if they have two years of complete data, their award will last for two years). See the **Outcomes section** in the [TEF Year Two Specification](#) for further information.

Question 12 – Rating Descriptions

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

Q12	Percent
Yes	26%
No	55%
Not sure	19%

119. A majority of responses, whether in favour or opposed, recommended clearer descriptions of the ratings, for transparency so assessors know what to look for and providers are clear on the basis of decisions.

“There is a lack of standards to define the ratings. This means that is not clear why ‘Outstanding’ is better than ‘Excellent’ (semantically they are the same). This problem could be addressed by using standards for each assessment criterion. Will stakeholders, and particularly prospective students, understand the ratings?”

Nottingham Trent University

120. Some respondents (both in favour and opposed) queried the terminology, i.e. the naming of the ratings, stating that it was unclear why ‘excellent’ was not the top rating. Additionally, respondents were critical of the use of both ‘excellent’ and ‘outstanding’; stating that the terms were potentially confusing and misleading as they are similar in meaning. Some also suggested they might not be easily understood by students and other stakeholders overseas.

121. Some respondents suggested that use of ‘Meets Expectations’ was a risk to the international reputation of UK HE, suggesting that the TEF could be misinterpreted. These respondents felt that the TEF level descriptions should reflect the UK’s standing in the international marketplace. Respondents suggested the use of ‘Good’ or ‘Fulfil Expectations’ to replace ‘Meets Expectations’. However, in contrast there were a small number of respondents who welcomed the positive nature of ‘Meets Expectations’, given that inclusion in the TEF was based on established judgements

of quality from bodies such as the QAA. A small number also suggested the addition of a fourth level.

“I’m not sure how far the public will see the distinction between excellent and outstanding. It’s a big jump in perception from ‘meets expectations’ to excellent.”

Burnley College

“[Members] welcomed the positive nature of the “Meets expectations” rating, preferring this to a rating which implied providers did not have good-quality provision, given that TEF inclusion was based on established judgements of quality from bodies such as QAA, and in due course the Office for Students.” **Independent Higher Education**

122. A number of respondents were concerned that if a provider was not deemed ‘Excellent’, then it could be perceived as deficient. These respondents were keen that the TEF ratings did not undermine the reputation of a provider. A suggestion to remove negative perceptions was the use of ‘Bronze/Silver/Gold’.

“Another option may be ‘Bronze’ / ‘Silver’ / ‘Gold’, already used successfully sector-wide in the Athena Swan process, with each level implying a certain level of achievement above the threshold standards.” **University College London**

Government response

123. Having considered the feedback, we have concluded that the TEF ratings will be changed to ‘Bronze’, ‘Silver’, and ‘Gold’. We consider that these changes to the rating names will avoid any risk of confusion of the different levels and will continue to uphold the reputation of UK HE internationally.
124. Following feedback from the majority of respondents, we have also developed level descriptors, which are set out below in Figure 1 . These descriptors are replicated in the **Assessment: decision making** section in the [TEF Year Two Specification](#).

Figure 1: TEF Descriptors

Gold: The Panel will award a provider a rating of Gold if it appears likely, based on the evidence available to the Panel, that provision is consistently outstanding and of the highest quality found in the UK Higher Education sector; that is:

The provider achieves consistently outstanding outcomes for its students from all backgrounds, in particular with regards to retention and progression to highly skilled employment and further study. Course design and assessment practices provide scope for outstanding levels of stretch that ensures all students are significantly challenged to achieve their full potential, and acquire knowledge, skills and understanding that are most highly valued by employers. Optimum levels of contact time, including outstanding personalised provision secures the highest levels of engagement and active commitment to learning and study from students.

Outstanding physical and digital resources are actively and consistently used by students to enhance learning. Students are consistently and frequently engaged with developments from the forefront of research, scholarship or practice, and are consistently and frequently involved in these activities. An institutional culture that facilitates, recognises and rewards excellent teaching is embedded across the provider.

Silver: The Panel will award a provider a rating of Silver if it appears likely, based on the evidence available to the Panel, that provision is of high quality, and significantly and consistently exceeds the baseline quality threshold expected of UK Higher Education; that is:

The provider achieves excellent outcomes for its students, in particular with regards to retention and progression to highly skilled employment and further study. Course design and assessment practices provide scope for high levels of stretch that ensures all students are significantly challenged, and acquire knowledge, skills and understanding that are highly valued by employers. Appropriate levels of contact time, including personalised provision secures high levels of engagement and commitment to learning and study from students.

High quality physical and digital resources are used by students to enhance learning. Students are engaged with developments from the forefront of research, scholarship or practice, and are sometimes involved in these activities. An institutional culture that facilitates, recognises and rewards excellent teaching has been implemented at the provider.

Bronze: The Panel will award a provider a rating of Bronze if it appears likely, based on the evidence available to the Panel, that provision is of satisfactory quality; that is:

Most students achieve good outcomes; however, the provider is likely to be significantly below benchmark in one or more areas, in particular with regards to retention and progression to highly skilled employment and further study. Course design and assessment practices provide sufficient stretch that ensures most students make progress, and acquire knowledge, skills and understanding that are valued by employers. Sufficient levels of contact time, including personalised provision secures good engagement and commitment to learning and study from most students.

Physical and digital resources are used by students to further learning. Students are occasionally engaged with developments from the forefront of research, scholarship or practice, and are occasionally involved in these activities. An institutional culture that facilitates, recognises and rewards excellent teaching has been introduced at the provider.

Next steps

125. As outlined at the start, this document is one of a suite of documents published that sets out the Government response to the Teaching Excellence Framework 'Technical Consultation for Year Two'. The [TEF Year Two Specification](#) sets out how we are planning to deliver Year Two.

Future development

126. Outcomes in Year Two will not be associated with differential fee uplifts for providers in England – rather, all those achieving a Bronze rating or higher will receive the full inflationary uplift. We will conduct a lessons-learned exercise at the end of Year Two.
127. The results of the lessons learned exercise will inform the implementation of Year Three, which will be a further opportunity for providers to apply for TEF before it moves to subject level in Year Four.
128. The move to subject level will be informed by a series of pilots in Year Three to test the assessment framework and process at subject level. The assessment framework and process will be informed by collaboration between the Department for Education, stakeholder groups and the existing TEF Delivery Board.
129. As outlined in the White Paper, postgraduate taught provision will be included in the TEF from Year Four at the earliest.

Annex A: Types of organisations that responded to the consultation

Options	Responses	
	No. ⁹	%
Alternative higher education provider (with designated courses)	20	6%
Alternative higher education provider (no designated courses)	1	0%
Awarding organisation	1	0%
Business/Employer	1	0%
Central government	2	1%
Charity or social enterprise	5	2%
Further Education College	29	9%
Higher Education Institution	132	43%
Individual (parent, student, teaching staff etc.)	11	4%
Legal representative	0	0%
Local Government	0	0%
Professional Body	20	6%
Representative Body ¹⁰	64	21%
Research Council	1	0%
Student	3	1%
Trade Union or staff association	2	1%
Other (please describe)	16	5%

⁹ Based on how respondents identified themselves in the consultation

¹⁰ Including 35 Students' Unions

Annex B: Further information on metrics

Updating the metrics

Most respondents recognised that metrics would be useful as proxies for teaching excellence. We agree with the large numbers of respondents who drew attention to the various on-going reviews, the potential for developing new metrics, and the need for consistency in communicating information for students across the sector.

TEF metrics will be reviewed regularly, including testing for any unexpected behaviour prompted by this new use of the data, and we will work with HEFCE, HESA and the sector to continue to strengthen the evidence base for teaching excellence in HE to ensure that the TEF uses the best possible metrics. For example, alongside this response, we have published the final version of the ONS's review of the data sources for Year Two TEF metrics¹¹ and our peer reviewed analysis of the factors that influence highly skilled employment or further study metric, which informed our decision on benchmarking. In August 2016 we published the first experimental statistics from the Longitudinal Education Outcomes (LEO) data set and we are evaluating options for using this powerful new dataset in TEF beyond Year Two¹² and our peer review analysis of the appropriate benchmarking factors for a highly skilled employment or further study metric. In August 2016 we published the first [experimental statistics](#) from the Longitudinal education outcomes data set and we are evaluating options for using the data in TEF beyond Year Two.

TEF metrics will be produced by HEFCE according to the TEF Year Two specification. During the consultation process HEFCE supplied illustrative metrics to providers. A high level summary of this data is available on HEFCE's website showing the distribution of flags across the sector.

Additional comments on metrics

There were some specific concerns raised about the metrics in the consultation. We believe they can be addressed by ensuring that the TEF assessors are aware of these issues, through highlighting in technical guidance and assessor training. These are:

London

“King’s has a particular concern in regard to the proposed use of POLAR3 data for this purpose. By now it is widely understood within the higher education policy community that the POLAR3 classification is simply not an effective indicator or measure of participation rates for London and other large urban areas as it cannot

¹¹ See ONS review

¹² See our response to the recommendations at Annex C of this document.

take into account significant socio-economic differences within wards. It is not accurate or granular enough in a large city context. Thus its use in TEF is not supported – at least in the context of London-based institutions without mitigation.”

King’s College London

Panel guidance will include background information on POLAR, including noting the high participation rates that may mask other social deprivation in London and other city areas.

Some London based providers also referenced the emerging picture of poorer NSS results in London than elsewhere¹³ which has been linked to a campus vs. city effect. We do not intend to include this in technical guidance as this is an emerging finding and has not been fully explored.

Bias in student satisfaction

“There is evidence that student evaluation of courses is affected by the gender and ethnicity of lecturers. As SOAS has a much higher percentage of female and BME staff than other HEIs, our staff are concerned about this as a possible source of error.” **SOAS**

Some respondents drew our attention to recent findings that female and minority ethnic academics receive lower satisfaction or evaluation scores than their peers. Whilst reports indicate this may be an issue at individual or course level, our own analysis does not find a significant relationship between the proportion of female academics and the NSS based TEF metrics at provider level, and only a very small relationship between the proportion of minority ethnic academics and the NSS based TEF metrics at provider level. Technical guidance will highlight that the latter could be a possible mitigating factor on NSS based metrics for providers with an unusually high proportion of minority ethnic academics.

Non-continuation

“For example, the non-continuation metric will disadvantage Scottish institutions for various structural reasons:

- *It considers Year 1 of a 4 year degree rather than Year 1 of a 3 year degree, leading to higher ‘neither award nor transfer’ rates in Scotland (due to an additional year where we need to retain our students / deliver them to a successful outcome).*
- *It includes people who move to another institution and this favours institutions with multiple others nearby (this is less true in Scotland).*
- *Colleges are included in the HESA statistics in England but not in Scotland, so people who move to a college in Scotland will be shown as non-continuing.”*

Universities Scotland

¹³ [Regional look at overall satisfaction scores from the NSS](#)

We intend that this will be explicitly recognised in the guidance to assessors as well as within the Scottish context statement (see main text). We recognise that the difference in how transfer to colleges is captured, as well as the different funding regime currently prevailing in Scotland, may serve in some cases to disadvantage Scottish providers on this metric.

Annex C: Response to the recommendation of the ONS's review of data sources used for TEF

The review made some very helpful recommendations that will contribute to the on-going development of TEF metrics. The following priority ratings were proposed by the ONS.

This annex contains our response to each of the recommendations.

Recommendation 1: Improvements to both the NSS and DLHE paper questionnaires and the on-line DHLE questionnaire should be made to bring them up to modern questionnaire design standards.

Priority: Medium

Status: ONGOING

HEFCE and HESA will consider this recommendation as part of their normal review cycle for the DLHE and the NSS.

Recommendation 2: Define the target population for the TEF

Priority: High

Status: COMPLETE

Since this review was commissioned we have defined the target population. The scope was outlined in the White Paper "[Success as a knowledge economy](#)" and is fully described in the document "[TEF Year Two Specification](#)".

Recommendation 3: Determine the extent of under and over coverage from the data sources. Modify the coverage of the data sources if possible and determine weightings to account for remaining differences.

Priority: High

Status: ONGOING

The majority of students and providers that are in scope for TEF are in the target groups for the data sources. Decisions will not be made on the basis of metrics alone; providers will have the opportunity to supply further data / evidence through their submission. Only students and providers in scope for TEF have been included in the construction of TEF metrics. If the data sources include out of scope students or providers, they are excluded.

Examples of TEF under-coverage occur when:

- Providers/Students are out of scope (not in the target population) for the source metrics
- Providers are in scope but do not participate
- Providers/Students are in scope but excluded from the TEF metrics calculations because of poor data quality

Annex F of "Teaching Excellence Framework: Year 2 Specification" lists any exclusions from the metrics data. Providers are encouraged to use their submission to address any

under-representation (for example, providers with large numbers of international students may wish to provide alternative destinations data).

At present, Alternative Providers are in the target population for HESA data, the NSS and DLHE but this is a recent development and not all providers are currently making returns. We expect all APs to participate in all TEF source data submissions / surveys by 2017/18.

Recommendation 4: Further analysis of the characteristics of responders and non-responders should be carried out; if differences are found, weights to adjust for the differences should be applied.

Priority: High

Status: ONGOING

HEFCE are investigating this impact of non-respondents on DLHE and the NSS and we would expect to implement any necessary changes for metrics in TEF Year Three.

Recommendation 5: Further review work should be carried out in conjunction with a fundamental review of the UKPI's benchmarking approach carried out by the UK Performance Indicators Steering Group.

Priority: High

Status: ONGOING

We are engaging with HESAs review and will extend this to carry out our own review of the benchmarks as used in the TEF if necessary. Whilst our intention would be to continue the link with UKPIs we acknowledge that in the long term the differences between the TEF and the UKPIs might result in different approaches to benchmarking.

Recommendation 6: Continue to engage with data providers and users to ensure their views and concerns are captured and addressed.

Priority: Medium

Status: ONGOING

Within HEFCE and HESA there are governance processes in place which seek to maintain user engagement.



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