

Summary of the listening sessions for the TEF Independent Review

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Introduction

This paper summarises the listening sessions held to inform Dame Shirley Pearce's Independent Review of the Teaching Excellence and Student Outcomes Framework (TEF). Dame Shirley reported to the Secretary of State for Education in August 2019. Her main report can be found here:

<https://www.gov.uk/government/publications/independent-review-of-tef-report>

The listening sessions were a key component of the Independent Review. They were extensive in number and scope, and covered a wide range of stakeholder groups, including providers of higher education and students, businesses and consumer advocates, and a range of other interested parties. Around 60 separate events were organised, and meetings were held in Birmingham and Leeds as well as London to ensure a good geographic spread.

The purpose of the sessions was to gather and discuss the views of key stakeholders in a way that complemented the findings of the "call for views" consultation – summarised in the separate report by York Consulting¹. The sessions created the space for the Review Team to go into issues in greater depth and to engage in dialogue to explore ideas. The sessions were each led by the Independent Reviewer or a member of her advisory group, and were supported by the senior advisor to the review.

This overview was developed to provide the Independent Reviewer and her advisory group with a summary of the issues raised at these listening sessions, identifying commonalities and differences between the groups of stakeholders, as well as some of the changes that stakeholders told the review they would like to see.

There are two sections to this document – an overview of the sessions that took place with nine domestically-focused stakeholder groupings set out below, then a more concise summary of the sessions which took place with those approaching the TEF from an international perspective.

Stakeholder groups

For the purposes of providing a concise and easy to navigate overview, the domestically-focused listening sessions have been grouped into broadly comparable stakeholder groups, as follows:

1. Further Education Corporations and Alternative Providers (**FECs and APs**)
2. **Universities** (Higher Education providers other than FECs and APs)
3. **Members of the House of Lords**
4. The **devolved administrations** (and associated sector bodies)

¹ York Consulting (2019) Analysis of responses to the call for views for the Independent Review of the Teaching Excellence and Student Outcomes Framework (TEF), <https://www.gov.uk/government/consultations/independent-review-of-tef-call-for-views>

5. **Students** (and student unions)
6. Student and consumer **advocates**
7. Charitable and non-departmental public bodies (**system bodies**)
8. **Employers** and Professional, Statutory and Regulatory Bodies (**PSRBs**)
9. **Staff** who work in Higher Education

These groupings include, where appropriate, relevant mission groups and representative organisations. The terms in bold are used throughout this document to link comments to the stakeholder groups.

The review also spoke to a range of stakeholders with a primarily international perspective. As they approached the TEF from a very different angle, the review felt that it would be more informative to have the findings from these sessions presented and analysed in a different way. The international stakeholder section can be found towards the end of this document.

For a comprehensive list of the stakeholders consulted, please see Appendix A.

Key themes

A selection of ten key themes, building on the terms of reference set out in the Higher Education and Research Act 2017, form the basis for the overview for the domestically-focused stakeholders. These themes are used as the titles of each section, and are:

- The **purpose** of the TEF;
- The **process** used by the TEF;
- The TEF **metrics**;
- The TEF **ratings system** (“gold”, “silver”, “bronze”, “provisional”);
- The **impact on providers** of TEF (other than burden);
- The **burden** of the TEF;
- The **international impact** of the TEF;
- The **public interest**;
- **Fairness**; and
- **Subject-level TEF**.

The feedback from the international stakeholders was instead considered against the themes of “**Awareness**”, “**Knowledge and Understanding**” and “**Impact**”.

An overview of the feedback from domestic stakeholders

Purpose

The TEF was set up to achieve two main key purposes - providing information to students and driving the enhancement of the provision of Higher Education. The purpose of the TEF was discussed at all listening sessions, with many stakeholders saying that the TEF should focus on one or other of these goals.

“The TEF should focus on enhancing provision”

Many stakeholders felt that the two purposes of the TEF were in tension with each other. Some thought that this tension led to the TEF not serving either purpose effectively, and that the TEF should choose one or the other; others disagreed and felt that the TEF should continue to focus on both, as the two purposes were inseparable.

The dominant view, expressed to some degree by all stakeholder groups, but most strongly by providers and system bodies, was that the TEF should focus on enhancing provision, and that to do this effectively it would need to be significantly refined.

Some of those representing longer-established universities felt that having the TEF focus on enhancing provision would require more granular information to be made available. This was because whilst provision was delivered at course-level, this was far removed from the provider-level that the TEF operated on.

Some representing providers, academic staff and the devolved administration stakeholders felt that the TEF was actively hindering a focus on enhancement as they believed it led to competition rather than collaboration, and diverted staff away from delivering teaching.

Many providers, particularly FECs and universities, felt that the information provided by the TEF (particularly the data split by student characteristic, and the subject-level data) was already proving very useful in enhancing provision. Many of those from FECs believed that the TEF highlighted their HE work, and gave them recognition for what they are doing for quality enhancement. They felt that increasing the visibility of HE in FE increased the voice of those within the college seeking to enhance HE. Many universities felt that strengths of the TEF were to hold providers to account, leading to more conversations about employability and skills, and as a tool for rebalancing a focus towards the student experience and journey. Many students, however, did not believe that there was much evidence to support the view that the information provided by the TEF led to the enhancement of provision.

Many stakeholders believed that students did not use the TEF, and that there was a lot of data available from other sources. They felt it would be preferable for the TEF to no longer have “providing information” as a purpose. This view was also felt by students who attended the listening sessions. Representatives of FECs, APs and the devolved administration stakeholders in particular felt that it was important that the

TEF did not act as a source of information for students, as they believed that it was a very poor measure of teaching quality. Many employer representatives also told us that there was limited awareness of the TEF amongst their members.

Some stakeholders, including many of those representing advocates of student or consumer interests, and many employers, even felt that the TEF was providing students with misleading information. They felt this way either because they felt that teaching excellence was not what the TEF was actually measuring, or because they believed that other sources of information (such as whether the course was accredited) would be more useful to students. In this way, they believed that the TEF acting as a source of student information could go so far as to impair student decision making.

“The TEF should retain both purposes - enhancing provision, and providing information”

A less common view, expressed by some advocates of student or consumer interests, was that the TEF should focus on both enhancing provision and providing information. This was because they believed that the two were inseparable. As there was no relationship between a provider’s TEF rating and the amount of money that they received per student, if the TEF rating was not used to provide information to students, it would not impact upon student choice. This would remove the incentive for providers to act to enhance their provision and thereby hope to improve their TEF rating.

Both stakeholders in favour of and opposed to the TEF providing information to students told the review that they believed that the TEF would need to be significantly refined in order to effectively inform students about the quality of provision. Some stakeholders felt that the TEF needed to be renamed, in order to make it much clearer to students that it measured graduate outcomes and the student experience, rather than the quality of teaching. Other stakeholders - particularly some of those representing the sector in the devolved administrations, APs and FECs - felt that the TEF needed to provide a more detailed and contextualised output to achieve the aim of providing information.

Process

The tensions between simplicity, accuracy and transparency were the basis of many of the discussions at the listening sessions as were those between relative and absolute values. . Most groups also had a variety of issues with how the process operated, and suggestions as to how it could be improved.

The tension between simplicity, accuracy and transparency

Many, particularly amongst providers, felt that the process was too complicated and lacked transparency. A common view, expressed by most groups, was that the technicalities of the process need to be better explained. How the benchmarking process worked was mentioned regularly in this context.

Those representing devolved administration stakeholders and smaller providers were not convinced by the “one size fits all” nature of the process. They were keen, for example, to set out more clearly that salary data had not been benchmarked to account for difference in regional job markets. .

Advocates of student or consumer interests could see that whilst the use of simpler terminology might help resolve the tension between simplicity, accuracy and transparency, the nature of the choice facing students looking to choose a higher education provider meant that the TEF would have to be relatively complicated.

Most of those who spoke to the review were in favour of the TEF being determined through a less complicated process. Despite this, a dominant view amongst both providers and the devolved administration stakeholders was that the metrics and benchmarking process needed to take greater account of contextual factors. This would favour a more complex and accurate process, over a simpler but less accurate one.

The tension between relative and absolute values

A dominant view amongst all groups was that it was very important for the TEF to include relative values, though many felt that the benchmarking process used to generate them was too opaque, and did not consider a sufficient number of factors.

Whilst many universities, particularly pre-1992 providers, felt that it was important to include absolute values alongside benchmarked data in the process, most FECs and APs felt that the TEF should not consider absolute values as these were more influenced by student backgrounds than by the quality of teaching.

Suggestions for improvement

Students, academic staff, employers and PSRBs all felt that the TEF process needed to engage them more effectively, particularly by seeking their contribution to the writing of submissions.

A common theme across most groups was the feeling that the TEF process needed to be better explained. This was felt most strongly by FECs, APs, system bodies and the devolved administration stakeholders, who were particularly keen to receive

guidance on how to best write a submission, especially with regard to how to present evidence for small or specialist cohorts of students.

A dominant view amongst universities was that TEF submissions should allow them to discuss their future plans.

Metrics

There was a fair amount of discussion around the tensions between qualitative and quantitative evidence. More of the feedback focused on issues with the metrics, and suggested how they might be improved or replaced. Despite this, a consistent theme was how useful the data was; particularly benchmarked, split, and at subject-level.

The tension between qualitative and quantitative evidence

A dominant view was that there needed to be greater weight given to qualitative evidence, particularly the submission. Many providers felt that their metrics made them bronze, and that there was nothing they could do about it through their submission as it was not given enough weight. This view was held most strongly by FECs.

Universities mostly agreed that more attention needed to be paid to the qualitative context, but there was no consensus amongst stakeholders as to the correct balance between qualitative and quantitative evidence. Some APs were concerned that a focus on the submission would lead to the TEF becoming an “essay writing competition”.

A small group of stakeholders - , some APs, academic staff, and devolved administrations - suggested that the qualitative evidence should include direct lesson observations.

Issues with the metrics

A dominant view amongst the smallest providers was that there were issues around the use of metrics with small sample sizes. This view was expressed more widely when it came to considering subject-level TEF.

Within the quantitative data, some (particularly FECs and APs) favoured an increase in the weighting of the National Student Survey, whilst a contrasting view (held most strongly by the devolved administration stakeholders and academic staff) was that this data set should have less weighting due to sampling errors and other perceived technical limitations. Many universities were also concerned about the NSS, given their recent experience of boycotts, but felt that decreasing its weighting undermined the credibility of the TEF. Some employers suggested that the TEF should include a new metric, similar to the NSS, which would capture feedback from employers.

A dominant view from FECs, APs, employers, and the devolved administration stakeholders was that data relating to salaries, such as LEO, was crude and should be less highly weighted. A contrasting view, expressed by a small number of universities, was that outcomes data had an important role to play. To some degree, all groups expressed concerns about the use of LEO without it including some form of regional weighting. This view was found most strongly amongst the devolved administration stakeholders, FECs and post-1992 universities.

Many providers (particularly APs and FECs) and the devolved administration stakeholders were concerned that continuation data was too blunt a tool to be an

effective measure. They saw a need to contextualise the continuation metric, to allow for consideration of why students did not continue and include allowances for regional context in respect of continuation.

A range of stakeholders across several groups expressed concern about graduate outcomes data not considering further study as a positive outcome, unless the further study was at a higher level.

Many suggested that new metrics should be added, such as one to better consider graduate outcomes, one to measure mode of delivery, and one to measure achievements against a widening participation objective – the latter being of interest to employers. Employers were particularly interested in the widening participation objective as it aligned with their own aims of recruiting more employees from disadvantaged backgrounds. Others, including system bodies, warned against adding too many new metrics as it would make it even harder for the wider public to understand.

A common view from the devolved administration stakeholders was that the TEF should allow their providers to use comparable metrics, such as the Scottish Index of Multiple Deprivation (SIMD) in Scotland rather than the Participation Of Local Areas metric (POLAR). A dominant view, expressed by most groups including students, was that the TEF should include a metric looking at learning gain, or if not a metric, learning gain should at least be considered more in the process than it is now. Most were not sure how this should be done, though system bodies suggested that an assessment of learning gain could be submitted as additional qualitative evidence.

Ratings System

The views expressed on the rating system focused on their granularity, how they are perceived and the range of awards available. There was also a broader discussion as to whether the outputs from the TEF process should take the form of specific awards, or whether the TEF should provide more detailed information instead.

Granularity

A common view amongst all groups, including students and employers, was that the options of “gold”, “silver” and “bronze” were too blunt to capture all of the information that fed into the TEF, and led to unfair and misleading cliff edges. Some, such as Advance HE and Independent HE, felt that this could be improved by having a wider range of awards. Others, such as some system bodies, felt that the system could indicate when a provider was close to achieving another rating level.

A contrasting and less common view, expressed by a small number of FECs and APs, was that the current ratings system was helpful as it was clear and easy to understand, and that it improved student choice by helping newer providers compete with better-established universities.

Perception and range of awards

A common view amongst most groups was that “bronze” ratings were wrongly seen as substandard or “needs to improve”. Some in each group suggested that there needed to be a new rating beneath “bronze”, equivalent to Ofsted’s “requires improvement” rating. Alternative Providers were particularly interested in this new rating being clearly beneath “provisional”, so that it was clear that “provisional” did not mean they were beneath quality standards.

Some amongst the member of the House of Lords, devolved administration stakeholders, FECs and APs were happy with the “gold” rating as it was an effective tool for promotional purposes and was useful for aspirational purposes. A contrasting view mentioned by a small number of participants was that disadvantaged students found “gold” intimidating and were discouraged from applying to highly rated institutions.

Differentiation

A dominant view, found in all groups, was that the TEF should produce a more differentiated outcome than just a single award. It was believed that this would better inform student decision making, reduce the impact of cliff edges and create more areas for improvement, thereby better incentivising enhancement of provision.

Some APs, as well as Universities Alliance, were keen on the introduction of a system that awarded “rosettes” or commendations, which they believed would create incentives for those providers who felt they would otherwise be unable to achieve above bronze. Alternative suggestions included:

- “gold” and “bronze” awards being supplemented with detailed comments,
- LEO information being presented as supplementary data alongside the award,

- a “dashboard” rather than a rating, and
- the TEF panels setting out areas for improvement in their feedback.

Impact on Providers

There was a great deal of variety when it came to views on the impact of the TEF on providers. The most common area of discussion was whether there were tensions between focusing on teaching and focusing on research.

The tension between educational experience and research or knowledge transfer

A dominant view, particularly amongst academic staff, was that the TEF drew resources away from other work carried out by providers. Students and smaller providers were particularly concerned about this when it came to subject-level TEF.

Some universities believed that this perceived drawing away of resources could negatively impact upon their research and post-graduate provision, whilst the devolved administration stakeholders believed it could even harm teaching quality by taking up staff time, by incentivising “gaming” behaviours (as they felt that improving the metrics did not necessarily correlate with improving teaching quality) and by encouraging grade inflation. Staff were concerned that the TEF did not attempt to measure improvement, and felt that the data which was captured was not meaningful in relation to teaching quality.

A contrasting view, expressed most strongly by providers (most strongly by FECs), was that the data provided by the TEF (particularly the benchmarked, split and subject-level data) really helped them focus on improving teaching quality, but would be even more helpful if the processes used to generate them were less opaque.

A view held by some FECs was that the TEF could lead to improvements in teaching quality by being aspirational.

Staff felt that the TEF had exacerbated the division between institutions that focused on teaching and those that focused on research.

Unintended consequences

Some universities and students expressed concern that poor TEF ratings and competition between departments could lead to “bronze” courses being neglected or cut, rather than receiving extra investment to enable them to improve.

Some staff believed that the TEF would not incentivise improvement, as it was too student-focused, and therefore it was not possible to tie it to career advancement in the same way as REF.

Some advocates of student or consumer interests suggested that the TEF should learn from the way issues with unintended consequences were being dealt with by the Knowledge Exchange Framework (KEF).

Burden

All groups had strong views on the burden of the TEF, and often discussed this in terms of the tension between the burden of the process and the value generated by the final output. Many also spoke about the relative burden of the TEF on different types of provider.

The tension between value and burden

A consistent and dominant view amongst all groups, particularly staff, was that the TEF was a significant burden. It was also a widespread view that the burden of TEF would become much greater with the introduction of subject-level TEF. Some universities, notably pre-1992 providers, suggested that there should not be a move to subject-level TEF (see separate discussion in subject-level).

Some, particularly FECs, APs and the devolved administration stakeholders, told us that they believed there was limited value in the TEF when Ofsted, the QAA or the devolved administration equivalents were already effectively assessing their quality.

Some advocates of student or consumer interests suggested that providers may be over-estimating the burden, as they would be carrying out some level of self-assessment at provider and subject-level even if the TEF did not exist.

Some students felt that there was a tension between the TEF quickly adapting to any future changes that might become relevant to students, and being low burden for providers. Many were also concerned that providers were focusing on the TEF at the expense of widening participation objectives and improving teaching quality.

Relative burden

A dominant view amongst all groups was that the burden of the TEF fell much more heavily on smaller providers as they had fewer staff. This view was most common amongst FECs and APs.

Most stakeholders from the devolved administrations, and the Russell Group, felt that providers in Scotland, Wales and Northern Ireland also suffered from a heavier relative burden, as they were also required to take part in local quality systems, and had to put a lot of work into the submission to explain how the local context affected their metrics.

International impacts

Most groups did not discuss the international impacts of the TEF in much depth. Those that did (universities, and politicians and devolved administration stakeholders) focused on how the TEF was perceived by international students.

International perception

A consistent view was that the TEF was confusing to international students, both in terms of the differences between the four educational systems of the UK, and in terms of what it meant to be less than “gold”.

Most of the devolved administration stakeholders feared that their providers would be disadvantaged if they did not participate in the TEF. Many universities and employers, and some system bodies, felt that the TEF wrongly sent the message that most UK provision was “less than the best” (i.e. not “gold”).

A common view on the solution to these problems was that the TEF needed to be presented to the outside world with greater clarity. In particular, it needed to be clearer that the TEF was a quality system specific to England, and that all providers were above a high baseline whatever their award.

Public interest

Much of the discussion around the public interest centred on the creation of unintended consequences, including conversations about how it impacted teaching quality, particular types of students, the devolved administration stakeholders, and employers.

Alignment of incentives

A common view amongst providers was that the TEF incentivised providers to focus on “gaming” metrics in a way that did not relate to teaching quality. Students might be encouraged to work in geographical areas with higher salaries, for example, which would be against the public interest as it harmed local economies and policies such as the “Northern Powerhouse”.

Some providers believed that the TEF increased competition and so harmed teaching quality by dis-incentivising collaboration between providers, and discouraged risky but worthwhile innovation in teaching methods and modes of delivery.

A view expressed mostly by FECs and APs was that the continuation metric encouraged them to pressure students not to drop out, even when this would be in the student’s best interests. Many of these providers also told us that it discouraged them from accepting students from disadvantaged groups, as they were more likely to result in negative flags for absolute values in the TEF process.

A contrasting view, expressed by a minority of FECs and APs, was that the TEF helped competition and choice by allowing them to be compared directly against more prestigious universities. Many APs, however, felt that the TEF’s impact on competition was limited due to new providers requiring too many years of comparable data before being eligible to take part.

Some providers told us that employers might be discouraged from hiring students from non-“gold” rated providers, harming students, or would just be confused by what the TEF was telling them. This was a particular concern for FECs and APs, where they believed that FE provision could receive an Ofsted grade that was significantly different to the HE provision’s TEF award.

Many employers told us that whilst the TEF provided valuable information if one knew to look for it, they were largely looking for graduates with specific skills, and they believed that these could not be found through the TEF. On the whole, they did not feel that currently there was a place for the TEF within their recruitment processes.

Devolved administrations

Discussions with the devolved administrations and associated sector/funding bodies outlined concerns with the way in which the TEF was communicated. They believed that the TEF is perceived as a UK wide quality scheme rather than a scheme

developed for higher education in England, which providers in the devolved administrations may choose to join.

The devolved administration stakeholders also reported issues with alignment of the TEF: specifically that the TEF did not align well with HE quality schemes and systems in Scotland and Wales, and that the LEO metrics did not cover providers in Northern Ireland.

Fairness

All groups set out a large number of perceived disadvantages associated with the TEF, and made suggestions as to how these should be remedied. Some also mentioned that a tension existed between having the TEF process be variable to better accommodate the diversity of the sector and having the TEF treat all providers consistently.

Perceived disadvantages

Perceptions of disadvantage were raised most consistently by FECs, APs and the devolved administration stakeholders. Across all groups, those most often described as being disadvantaged by the TEF were smaller providers; providers outside of London and the South East; part time and widening-participation students; and providers operating interdisciplinary courses.

Many felt smaller providers were disadvantaged due to the burden of completing a TEF submission being spread across a smaller number of staff (in many cases, only one staff member), and because less data was available upon which to base a judgement. This was a particular issue for FECs and APs, and was felt to be significantly worse for subject-level TEF. Smaller providers and APs expressed concerns about being disadvantaged by the TEF process because they felt the need to explain the legitimate gaps they had in the metrics, due to the size or nature of their provision, in their submission, using up space that other providers used to describe their positives. APs particularly felt they offered unique, flexible provision in response to market demand but that the TEF was designed around traditional three-year university provision.

Suggested solutions were to provide more guidance on writing submissions, and reducing the scope of subject-level TEF.

Most providers and the devolved administration stakeholders felt that the TEF was unfair to non-London and South East providers as graduates earn more in London. Devolved administration stakeholders also felt that differences in context between their providers and those in England were not properly accounted for. Suggested solutions focused on using regional benchmarking of outcomes data, and allowing the use of alternative data sets in the devolved administrations.

A common view amongst all groups was that the TEF needed to include an effective measure of “learning gain” or “value added” so that it was able to compare between different types of provider and student more fairly. Alongside reducing the weighting of the LEO salary data, this was one of the most commonly suggested solutions to the perceived disadvantage faced by providers with large numbers of widening participation students.

Many universities and the devolved administration stakeholders told us that interdisciplinary courses were particularly disadvantaged by subject-level TEF, as they did not easily map onto a single subject. Some indicated that as it did not seem to be possible for subject-level TEF to treat all types of provider and provision fairly,

their preferred solution would be to not move to subject-level TEF (in England) or to not take part (elsewhere in the UK).

Whilst the need to improve benchmarking approaches dominated discussions of benchmarking, a minority view was that benchmarking was inherently unfair because by definition someone had to be below average, even if all provision was excellent.

The tension between the diversity of the sector and having the TEF be consistent

Some of those who suggested changes that they felt would lead to the TEF taking better account of the diverse range of students and providers, also told us that introducing such additional measures would greatly increase the burden and complexity of the TEF process, which would not be desirable.

A less common view, from Independent HE, was that the TEF process should operate differently for different types of provider, to reflect the different expectations of students.

Subject-level TEF

All groups had views on subject-level TEF, often informed by experiences of taking part in the subject-level pilots being run by the OfS. The views were dominated by discussions around the utility of the data, the choice of subjects, and the tension between burden and value. One of the most common views, particularly amongst providers, was that subject-level TEF should not be continued.

Utility of data

The dominant view was that the data provided by subject-level was useful, both for informing students and for helping drive providers' internal processes so that they could better enhance provision. Some told us that the data helped facilitate a conversation with a wider group of colleagues, including academics. This was felt to be particularly true for split and benchmarked data, though some smaller providers told us that they could not take advantage of this benefit as their data sets were so small as to be suppressed. Most employers valued the raw subject-level data, as they felt that both the subject-level awards and the provider-level data were too broad.

A contrasting view, expressed by some universities, was concern that poor data at subject-level could drive course closure. Some employers felt that subject-level data was not drawn out enough, particularly as outcomes may vary significantly between courses.

The choice of subjects

A common view was that the subjects used by subject-level TEF were too broad, with the courses within them too different to enable meaningful comparison. Many FECs and APs felt that specialist or single-subject providers could be significantly disadvantaged by differences in graduate salaries that could mostly be explained by the differences in the type of course within a subject, rather than by the quality of teaching.

Some were concerned that the greater levels of granularity associated with subject level would lead to fewer providers and courses having sufficient data to participate.

Many people across the different groups told us that an issue with subject-level TEF was that the subjects did not match academic departments, and that it was therefore difficult for providers to align the TEF with existing quality and data collection systems. They believed that this increased the burden associated with the TEF. Some employers suggested the solution was aligning the subjects in the TEF to those used by the REF.

The tension between burden and value

Most felt that the value of receiving subject-level data and awards was outweighed by the disproportionate level of burden, the opaque and complex nature of the processes involved, and the limited availability of robust data at subject-level. Most devolved administration stakeholders told us that these issues would see their

providers choose not to engage with subject-level TEF; many providers in England felt similarly, and their preferred solution was not to move to subject-level TEF.

A less common view, held by some APs and advocates of student or consumer interests, was that the subject-level TEF was more worthwhile than provider-level TEF as the information it provided enabled competition between new and established providers, thereby incentivising enhancement. Some system bodies were concerned that if a subject had a different TEF rating to that of the provider it could be confusing.

An overview of the feedback from international stakeholders

Key points from international stakeholders

- The Teaching Excellence and Student Outcomes Framework (TEF) was not universally known, but there was some awareness among institutional leaders and policy makers in certain countries.
- There was a broad view that the TEF had positive features, in particular, its impact in highlighting the importance of teaching, the learning experience and outcomes for students, and the fact that it was government backed.
- International stakeholders tended to support the purpose of the TEF as an information tool, as this would support transparency.
- Ratings were attractive in their clarity and simplicity but they were felt to be potentially misleading in that they could disguise a complex picture.
- It was felt that the name of the TEF could be misleading, especially as teaching excellence could be interpreted in many different ways.
- There were mixed views on the metrics, including the use of proxies.
- It was believed that clearer communication was needed about the TEF, including its purpose and the rating system, to avoid misunderstandings and reputational damage.
- Institutions and prospective international students tended to value league and rankings tables. It was felt that there was potential for the TEF to feed into these.
- It was believed to be too early to judge whether the TEF would have an impact internationally.
- For countries which are devising similar systems, the TEF was being looked at closely along with other schemes.
- Overall, the TEF was valued for what it was trying to achieve, in terms of raising the profile of education in HE internationally and possibly the visibility of lesser-known institutions.

The following section summarises the findings from the review's discussions with stakeholders with a primarily international perspective. A series of calls were held with experts in countries across the world. The list of people contacted is set out in Appendix A. The views of these experts are summarised in three areas: awareness, knowledge and understanding, and impact.

The findings in this overview are broadly consistent with those outlined in the British Council report: 'International Perceptions of The Teaching Excellence and Student Outcomes Framework'². International insights and considerations are also addressed throughout the Independent Review.

Awareness

An overall consensus was that there was at least some awareness of the TEF, in particular among senior thinkers in HE. It was believed that this awareness varied within and between countries.

Insights from the interviews suggested that awareness of the TEF tended to be greater in countries which closely follow university rankings and league tables.

Awareness and interest also seemed to be greater in countries with similar policy activity in higher education. Specifically, there was interest in Australia within government and providers at executive level, as they were undertaking a consultation on the reforms of performance based funding for the Commonwealth Grant Scheme.

Knowledge and Understanding

A dominant view was that, once explained, the TEF was appreciated for what it was trying to achieve, notably in raising the profile of students' education within HE relative to research. However, a further dominant view was that levels of knowledge and understanding of the detail were in general limited.

The TEF tended to be interpreted as part of a review process, but its relationship with a quality assessment framework was unclear.

There appeared to be some misconceptions as to whether the TEF was voluntary or obligatory. Stakeholders also did not fully appreciate the details of the benchmarking process, or that the continuation and employment data only applied to UK students.

When the dual purpose of the TEF was explained, there was a shared view that it could be valuable as an information tool for stakeholders, and as a means of improving the transparency of institutional performance.

Ratings and Metrics

² British Council (2019) International perceptions of the Teaching Excellence and Student Outcomes Framework, https://www.britishcouncil.org/sites/default/files/international_perceptions_of_teaching_excellence_20190329.pdf

There were contrasting views on the suitability of the “gold”, “silver” and “bronze” (GSB) rating system used for the TEF.

Some respondents valued the ratings for their clarity and simplicity. They believed that the ratings reduced the metrics to a form that international students, for example, would value.

It was also stated that these ratings might signal to the sector where improvement is needed. However, a contrasting view in several sessions was that the rating system was too simplistic and disguised valuable detail, which many stakeholders, including students and their advisors, would welcome.

Interviews highlighted that the system could easily be misunderstood. Specific references were made to the “bronze” rating, which was often viewed as poor performance. There was a clear consensus that the current TEF ratings – without clear explanation - could damage institutions’ reputations internationally. Equally, it was felt that “gold” ratings could enhance institutions’ reputations.

It was argued that some of the metrics could be misleading, particularly with regards to measuring ‘teaching quality’. As such, many also thought that the name of the exercise was inappropriate.

Issues were raised regarding the difficulty of comparing institutions that were fundamentally different and had different missions. It was thought that specialist providers, for example, should not necessarily be judged in the same way as full-subject institutions.

Other comments on the ratings included that a “gold” rating could lead to institutional complacency; and that “bronze” could create a culture of ‘tunnel vision’, in which an institution might focus on meeting the metrics for the TEF at the expense of other priorities.

A common view was that the TEF ratings and metrics could lead to innovative activities not being recorded, and that they might even be discouraged. The inclusion of an institutional commentary in the assessment process was also broadly welcomed.

Impact

A prominent view was that the TEF almost certainly already influenced choice amongst those who were aware of it, as there was often only a relatively small amount of information available to prospective international students.

It was felt that the simplicity of the ratings system, and that they were government backed, aided the TEF’s impact. The government backing particularly mattered in the international market.

However, there was a view that membership of a particular mission group was more influential in shaping current choice than its TEF rating. It was a common view that the TEF score often reinforced what students already knew about certain institutions.

There was a strong consensus that university rankings were influential in shaping institutional reputations and student choice. It was felt that these rankings could drive change within institutions, but also that they only covered a limited area of students' education.

Overall, there was a positive feeling about the TEF, particularly its impact in terms of highlighting the importance of teaching, the learning experience, and outcomes for students.

Learning and International Conversations

It was acknowledged that dialogue about, and interest in, the TEF might grow. However, it was felt that this would depend on the ways in which the exercise progressed and how it was communicated.

It was clear from the interviews that many countries already had systems in place for monitoring and reviewing teaching, and whilst a dialogue with international stakeholders would be welcome, this would not necessarily be with a view to adopting a system similar to the TEF.

Insight from China revealed that - in view of particular institutions' specialisation in particular fields of study - certain providers may be outstanding in one field but not in another. Therefore, a system similar to the TEF might not be suitable.

An important point was raised that in certain European countries and beyond, much information on the student experience is collected with a view to informing student choice, e.g. UMultirank, and that if the TEF were to become a stable exercise, then it might be incorporated into international choice tools of this kind.

General Observations and recommendations

It was thought that the TEF had the potential to feed into international league tables. In particular, metrics around the 'quality of teaching' could contribute to overall rankings. This was thought to be important in view of the significance of such rankings to adult influencers and students.

There was a general view that linking funding to quality assessment might not be appropriate, depending on the rigour of the exercise.

There was a view that it was extremely difficult to measure 'quality' and 'improvement' and, in particular, it was challenging to ensure there was sufficient context surrounding the metrics.

There was a suggestion that the GSB rankings could be changed to a 100-point scale for greater transparency. It was felt that this should be coupled with a change in the TEF name, as it was argued the TEF does not measure teaching excellence.

Reference was also made to the value of using social media and big data in exercises like the TEF. In terms of metrics on student outcomes, frequent reference was made to the merit of including a measure on 'learning gain'.

Overall, international stakeholders recommended that the main purpose of the TEF should be clarified. It was believed that the TEF might create greater transparency and that prospective international students might value the information it provided, but that at the same time, stakeholders were not sure whether it could also be an effective tool to drive institutional improvement.

Appendix A – Stakeholders involved in the listening sessions

This is a non-exhaustive list of the stakeholders who attended the listening sessions held by the Independent Review of the TEF or who spoke to Dame Shirley Pearce during the course of the review.

Due to the large number of stakeholders with a domestic focus, they have not all been named individually.

Stakeholders with a domestic-focus:

- 1. Further Education Corporations and Alternative Providers**, including:
 - The Association of Colleges (AoC) alongside a number of their members
 - The Mixed Economy Group (MEG) alongside a number of their members
 - Independent HE alongside a number of their members
 - A number of larger Alternative Providers

- 2. Universities** and the wider HE sector, including:
 - Guild HE
 - The Russell Group alongside a number of their members
 - Universities UK (UUK) alongside a number of their members
 - A large number of representatives from UK HE providers who signed up to one of three open sessions – one in Leeds and two in London
 - The Association of Heads of University Administration (AHUA)
 - British Universities Finance Directors Group (BUFDG)
 - Million Plus
 - Universities Alliance

- 3. Members of the House of Lords**

- 4. The devolved administrations and associated sector bodies**, including:
 - The Scottish Government
 - Universities Scotland, alongside a number of their members
 - The Welsh Government
 - Universities Wales
 - The Higher Education Funding Council for Wales (HEFCW)
 - The Department of the Economy (Northern Ireland)

- 5. Students and student unions**, including:
 - A number of students and student unions who signed up to one of three open sessions – one in Leeds and two in London

- 6. Student and consumer advocates**, including:
 - Which?
 - The Complete University Guide
 - The Association of Graduate Careers Advisors (AGCAS)
 - A number of graduate careers advisors
 - Push

7. Charitable and non-departmental public bodies, including:

- UCAS
- The Quality Assurance Association for Higher Education (QAA)

8. Employers and Professional, Statutory and Regulatory Bodies, including:

- The Confederation of British Industry (CBI)
- The National Centre for Universities and Business (NCUB)
- The Federation of Small Businesses (FSB)
- The Institute of Student Employers (ISE), alongside a number of employers who sit on their board
- Prospects
- The Association of Chartered Certified Accountants (ACCA)
- The Engineering Council (ENGC)
- The Royal Society of Chemistry (RSC)
- Screen Skills
- The Academy of Social Sciences

9. Staff who work in Higher Education, including:

- The University and College Union (UCU)

10. Other individuals and organisations, including:

- Professor Sir Chris Husbands (Chair of the main TEF assessment panel);
- Professor Janice Kay (Chair of the main TEF assessment panel for the subject-level pilots, and Vice-Chair of the main TEF assessment panel);
- Iain Mansfield, a former DfE official, responsible for TEF;
- Gordon Marsden MP, Shadow Minister for Higher Education, Further Education and Skills;
- David Sweeney, the Executive Chair of Research England;
- The Rt. Hon. Lord David Willetts, the former Minister of State for Universities and Science (2010-2014);
- A number of TEF assessment panellists;
- Ofsted;
- The Department for Education;
- The Office for Students (OfS);
- The Royal Statistical Society.

Stakeholders with a primarily international focus:

• **Australia**

- Paul Wellings, Vice-chancellor of University of Wollongong, Chair of the Expert Group working on Australia Performance Based Funding Plans
- Phil Aungles, Director of Performance and Analysis Section, Higher Education, Research and International, Department of Education and Training

• **Canada**

- Harvey Weingarten, President and CEO – Higher Education Quality Council of Ontario
- **China**
 - Hamish Coates, Professor and Director, Higher Education Division, Institute of Education, Tsinghua University
- **The Netherlands**
 - Frans van Vught, Honorary Professor of Comparative Higher Education, University of Twente, U-Multirank Lead
 - Bert van der Zwaan, Rector Manificus at Utrecht University
- **UK-based**
 - Jo Beall, Professorial Research Fellow at London School of Economics, Former Director of Education and Society at British Council
 - Fiona Crozier, Head of International at the Quality Assurance Agency for Higher Education (QAA)
 - Simon Marginson, Professor of International Higher Education at the University of Oxford