



Pearson

Pearson College Consultation response

BIS consultation

Response Teaching Excellence Framework: Technical consultation for year 2

12 July 2016

Questions

Question 1: Do you agree with the criteria proposed in Figure 4? Please outline your reasons and suggest any alternatives or additions.

Broadly yes. However, the use of retention data may operate against students wanting a more flexible approach to HE eg through credit accumulation over many years, or those with a focus on specific modules or years rather than full degrees. Therefore this might conflict with the needs for a more flexible approach being explored in the Accelerated Courses Call for Evidence, or with the needs of working students or those considering Higher Apprenticeships.

Question 2: A) How should we include a highly skilled employment metric as part of the TEF?

Although this is an interesting metric to consider, we would question the assumption that only certain level jobs utilise the skills gained in HE (para 70) and therefore the rationale for adding a highly skilled employment metric. University degrees are meant to develop transferrable skills that can be used in many jobs and activities. Many employers request and/or choose employees with degrees, even for jobs that technically may not necessitate a degree. But obviously if the employer is choosing a graduate they must be doing because of the additional skills the graduate brings with them that can benefit the employer. Additionally we agree that there are many factors that impact on employment apart from teaching quality. In addition to location and university brand mentioned in para 72, there is socio-economic background, school results, race, gender, family connections, the state of the economy across different industries and locations, the type of industry the graduate aims to work within, career development support, and reason for attending HE (including those with ambitions outside of obtaining highly skilled employment). It is therefore questionable whether this should be a core metric. Furthermore, if providers could receive a result below the benchmark in this metric, it could in fact deter providers from seeking to take proactive steps to widen participation.

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?

Yes. The SOC groups are established and recognisable, even if somewhat limited in scope.

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

Unsure.

Please outline your reasons and suggest any alternatives.

The HE system is being reformed very much on the grounds of student choice. Not all graduates are focused on being employed 6 months after graduation. There are many other reasons for wanting a university education apart from employment. Therefore employment rates would probably be more meaningful if they include those seeking to be employed and therefore exclude retired, those in ill health, travelling, taking care of home and family etc as is currently done under the UK PI definition. Alternatively, perhaps both figures could be shown (ie with and without the expanded denominator).

Also, according to some surveys up to 20% of students do not undertake a degree primarily for career purposes. Perhaps consideration should be given on how to measure their outcomes at a later stage.

Question 3: A) Do you agree with the proposed approach for setting benchmarks?

The concept of setting benchmarks is probably sound, though it is in essence an average rather than a goal and often misunderstood. There are other factors that could have a big impact on the benchmark (especially employment) including university brand and age, socio economic background, and location. As these are unconnected to teaching quality consideration could be given to including them in the factors setting the benchmark.

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)?

Please outline your reasons if you disagree.

We agree that the flags should be based on statistical significance. However, the 5% chance of false flags seems quite high.

Question 4: Do you agree that TEF metrics should be averaged over the most recent three years of available data?

Unsure.

Please outline your reasons and suggest alternatives.

On the one hand this seems reasonable for the reasons given in the consultation. On the other, one is reminded of the financial services industry and the requirement now to include in advertising “past performance is no indication of future performance”. This could particularly apply to employment statistics. Therefore the most recent might be more relevant.

Question 5: Do you agree the metrics should be split by the characteristics proposed above?

Yes to some extent, but will the “high, medium or low tariff” recognise students from a non-traditional background?

Please outline your reasons and suggest alternatives.

A key aim of the TEF is to embed widening participation throughout, so it is important that there is a clear way to identify the number of students from a non-traditional background in the Entry Requirements data.

Also para 87 could be heavily bureaucratic and involves a high level of granularity and therefore may lead to very small sample spaces. This is particularly so in part time courses where most providers have seen a significant decrease. Minimum size samples for proper statistical analysis will be needed, as otherwise this could mislead students.

Question 6: Do you agree with the contextual information that will be used to support TEF assessments proposed above?

Yes. Please outline your reasons and suggest any alternatives or additions. Context should probably include the mission of the institution ie Providers should be assessed against their mission.



Pearson

Question 7 A) Do you agree with the proposed approach for the provider submission?

Yes to some extent.

We suggest a definition is given to impact and effectiveness in the teaching context, as this was quite controversial when first introduced to research. Here impact and effectiveness seem to mean something beyond the core metrics. An agreed definition may be necessary to ensure fairness and consistency.

It is not clear how the metrics and the provider submission sit together. Is one more important than the other? Will there be a minimum “score” of the metrics needed to be excellent or outstanding, irrespective of the provider submission?

B) Do you agree with the proposed 15 pages limit?

No.

Please explain your reasons and outline any alternative suggestions.

A maximum word count would allow providers more flexibility in how they present their submission.

Question 8: Without the list becoming exhaustive or prescriptive, we are keen to ensure that the examples of additional evidence included in Figure 6 reflect a diversity of approaches to delivery. Do you agree with the examples?

Yes.

Please outline your reasons and suggest any additions or alternatives.

Simply make it clear these are examples only and not exhaustive and that diversity is encouraged.

Question 9: A) Do you think the TEF should issue commendations?

Yes.

It should also be possible for those rated as “Meets Expectations on procedural grounds” to receive a commendation should it be deserved.

B) If so, do you agree with the areas identified above?

Yes.

Please indicate if you have any additional or alternative suggestions for areas that might be covered by commendations.

There should be many possibilities here, especially if we want to encourage diversity. Others could be:

Excellence in encouraging citizenship

Excellence in career development

Excellence in extra curricula (academic or employment related) opportunities

We would also suggest that these should not be rare but used more generously. The consultation states it only expects about 20% to be Outstanding, so it already proposes a relatively rare “award”. Plus to get excellent or outstanding requires high performance across all three elements. Commendations could be used for a much wider range of providers who have excellence in a more niche area. This would encourage more providers to participate, and recognize excellence in a different and more diverse way.

Question 10: Do you agree with the assessment process proposed above?

No, not entirely.

Please outline your reasons and any alternative suggestions.

Para 114 notes that all providers must meet high baseline standards, and that the UK has a deservedly high HE reputation. However, the minimum level “meets expectations” sounds quite poor. There we suggest another form of more positive wording is considered eg “meets the high expectations of the UK HE sector”.

Para 116 implies that there may be certain minimum scores for the 3 different TEF levels. Presumably this will also mean that if providers get those scores they will be entitled to excellent/outstanding. This is implied but needs to be made clear in the interests of fairness, consistency and transparency.

Para 117 refers to how the benchmarks will be used. As these are just averages in the sector, not goals or standards in themselves, then this inevitably means that only a certain percentage of universities can ever be outstanding or excellent even if the entire sector significantly improved its teaching. This creates a zero sum game and could be demotivating for providers in the long run. Is this the intended policy? If the intention is to have a bell curve, then this should be made clear rather than expressed vaguely as it is in para 119.



Pearson

Finally, consideration should be given to whether it is advisable to omit the CMA compliance given its importance and the fact that providers could face civil proceedings or a criminal investigation for non-compliance.

The proposed process is set within a relatively tight timescale, reflected in the key dates included in Annex B. Responses should be framed within this context.

Question 11: 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?

Yes.

Please outline your reasons.

The TEF is a voluntary process therefore providers are able to make their applications when they feel in a position to do so, even if they only have one year of core metrics. Linking the award duration to the number of years of core metrics provided will ensure that certain providers, in particular Alternative Providers and some Further Education Colleges, are still able to achieve a TEF award with less than three years of core metrics.

Question 12 Do you agree with the descriptions of the different TEF ratings proposed in Figure 9? Please outline your reasons and any alternative suggestions.

No, not entirely.

The 'Meets Expectations' description should include a reference to the acknowledgement referred to in paragraph 50, i.e. that there may be providers with this rating that are unable to apply for a higher rating, due to their inability to demonstrate suitable metrics. It is important to state it is possible for a provider to have this rating as a result of procedural grounds.

Additionally we suggest Meets Expectations should be expressed more positively.

There is no difference between Outstanding and Excellent apart from those two words which remain undefined. There is a lot of room for difference of opinion here, which provides a real challenge to making sure the system is fair, consistent and transparent. We therefore suggest clearer and more objective definitions are needed.

Finally, the members of the panels will have an opportunity to significantly impact the reputation and future of individual institutions and their students. It is crucial that the panels operate as objectively as possible. Therefore in addition to training all panel decisions should be supported by clearly stated reasons and evidence, be open to scrutiny and there should be a fair appeal process.