



**Independent Review of the Teaching Excellence
and Student Outcomes Framework at subject-level**

**Response from the Chartered Association of
Business Schools**

1 March 2019

The original call for evidence documents are available at:

<https://www.gov.uk/government/groups/teaching-excellence-framework-independent-review>

About the Chartered Association of Business Schools

The Chartered Association of Business Schools is the membership body of the UK's business schools and represents around 120 business schools and higher education providers, as well as affiliate stakeholders, corporate members and international partners. The UK's business and management education sector represents 1 in 7 university students and has a particularly high concentration of international students, accounting for 1 in 4 undergraduate international students and 1 in 3 postgraduate international students. It therefore has a strong interest in ensuring that subject-level TEF results in meaningful outcomes for both business schools and students, including international students.

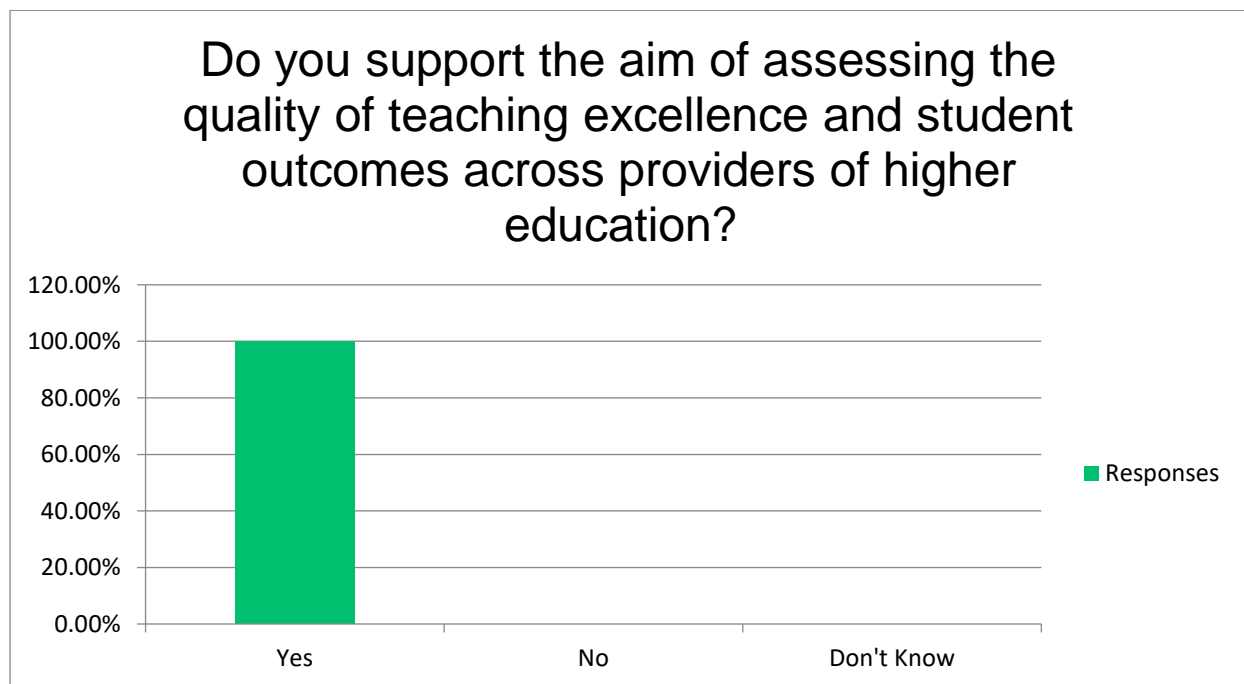
Introduction

This document outlines our answers to Dame Shirley Pearce's Independent Review of TEF. Our response to each question was based on the consensus view of our members as expressed in an online survey which replicated the questions asked by the Independent Review. In addition we have also cited the results we received from members to each closed-ended question.

Consultation questions

Why have TEF?

Q10. Do you support the aim of assessing the quality of teaching excellence and student outcomes across providers of higher education? Please explain why.



Proposed response: Yes.

Proposed explanation: Teaching quality is a key expectation of students and TEF has put learning and teaching and student experience high on the agenda at all universities. TEF has helped to rebalance the strategic focus of HEIs away from just research outputs to include learning and teaching which in many cases is what keeps HEIs alive. Although the metrics used by TEF are the subject of much debate, we are in agreement with the overarching principle that universities should

be accountable for the experiences received by students and that it is important to demonstrate excellence.

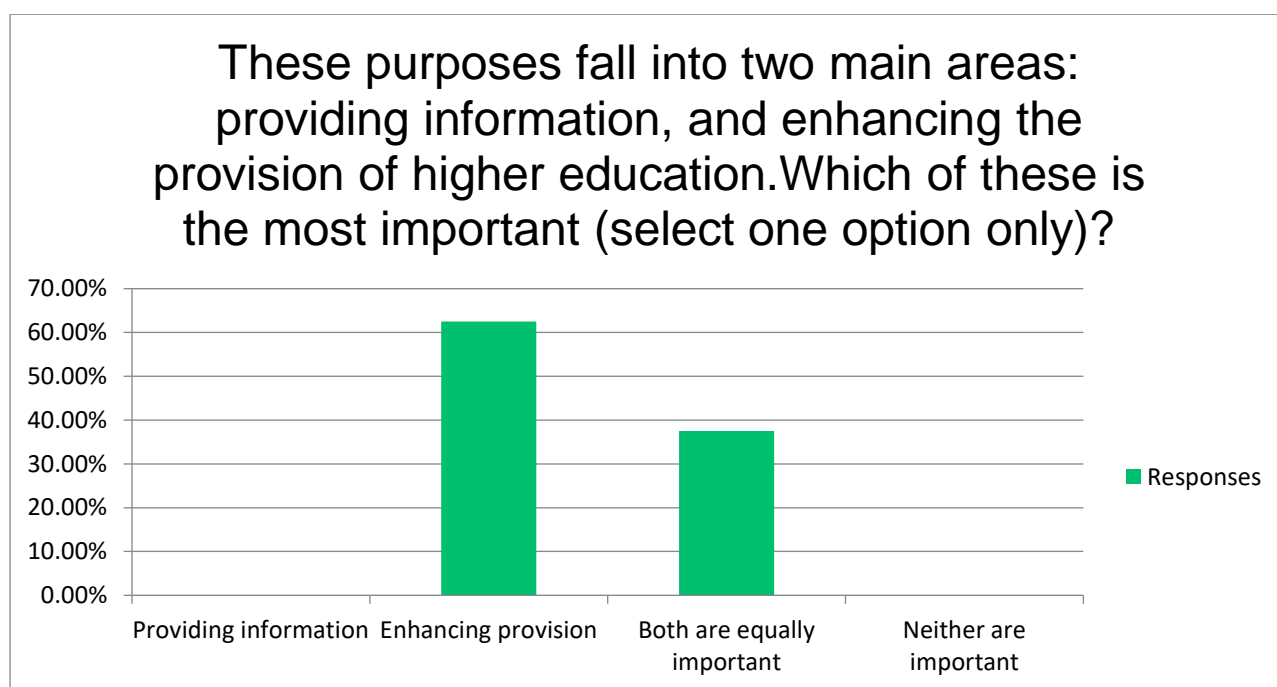
Q11. The Government has stated that the purpose of the TEF is to:

- *better inform students' choices about what and where to study;*
- *raise esteem for teaching;*
- *recognise and reward excellent teaching; and*
- *better meet the needs of employers, business, industry and the professions.*

a. Which of these is the most important (select one option only)?

- *Providing information*
- *Enhancing provision*
- *Both are equally important*
- *Neither are important*

b. Please outline below the reasons for your answers



Proposed response: Enhancing provision.

Proposed explanation: A majority of the members who provided us with their views on the Independent Review of TEF felt that enhancing provision is the most important purpose of TEF but a significant proportion also felt that providing information and enhancing provision were both equally important.

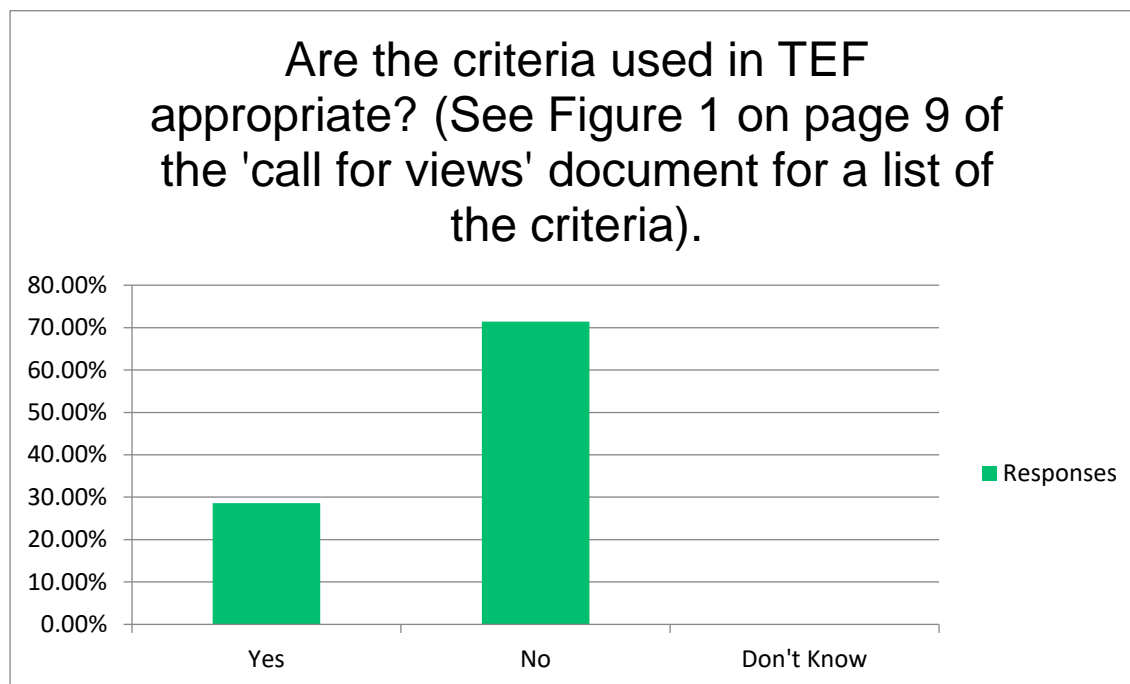
The provision of information on teaching quality will encourage providers to enhance their delivery but it is important to remember that student decision-making on where to study is motivated by a variety of factors (e.g. location, overall reputation) and not solely by teaching quality. Also, it is arguable that most students lack an appreciation of what 'good' teaching looks like. Prospective students are already inundated with a lot of information on universities (e.g. league tables) so it is wise to consider the possibility that TEF could result in confusion and information overload.

Q12. Should there be any other purposes for TEF?

Proposed response: TEF has the potential to encourage the sharing of best practice in teaching across institutions. Any widening of the purposes of TEF should bear in mind that the exercise is already quite ambitious and that the availability of data is a constraint. Such complications were already observed in the previous subject-level TEF pilot when attempting to develop a teaching intensity measure.

How well does TEF work?

Q13. Are the criteria used in TEF (see Figure 1 for a list of the criteria) appropriate?



Proposed response: No.

Proposed explanation: The consensus view from members of the Chartered ABS is that the metrics are overly reliant on data from the NSS and that the quality of academic support could be better measured through other metrics. This could include a measure for learning gain (although it is admittedly difficult to establish a good model for this), data on student to staff ratios and the availability of small class seminars and extra-curricular support programmes. It should be remembered that the NSS is ultimately a measure of satisfaction rather than teaching quality.

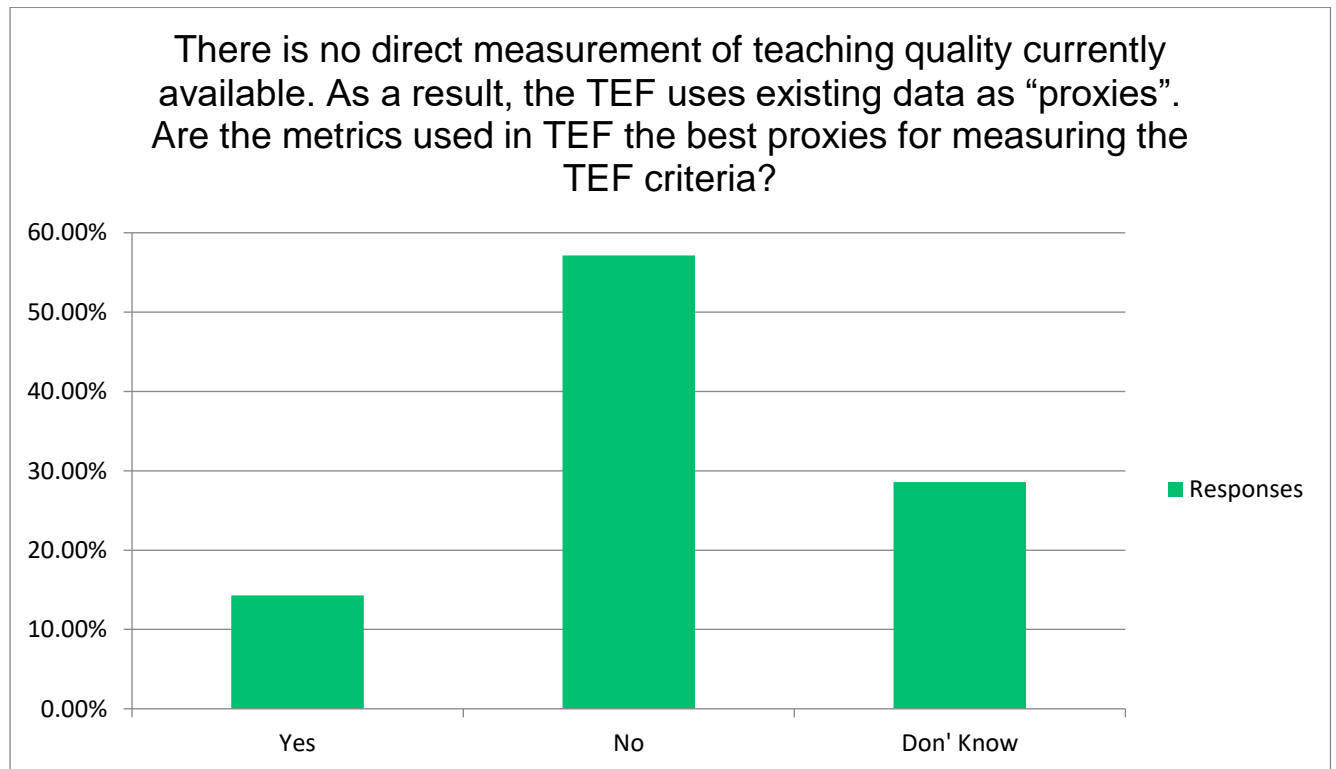
There is a wider question as to how teaching quality can be accurately measured? Several of the core metrics don't relate to teaching quality and the current weightings place a stronger emphasis on employability at the expense of teaching quality. Our members believe that TEF should ultimately be about enhancing teaching quality and we therefore advocate further work in developing reliable metrics to measure this as opposed to persisting with proxies that are not suited for this purpose.

We would like to see teaching given a higher weighting in the metrics based on a more robust NSS and/or a meaningful measure for assessing actual teaching quality. Assigning such a high weighting to graduate outcomes raises the concern that it could lead to courses in some subject areas being undermined as universities will strategically decide to remove these from their portfolios to help boost their metrics scores. On the plus side, the metrics have the potential to illustrate how a

subject is performing on measures that are important to higher education more generally e.g. widening participation.

Q14. There is no direct measurement of teaching quality currently available. As a result, the TEF uses existing data as indirect measures of teaching quality. These measures are known as “proxies”.

- a. **Are the metrics used in TEF the best proxies for measuring the TEF criteria (see Figure 1 for a list of the criteria and metrics)?**
- b. **If you answered no, what metrics would be more suitable proxies?**



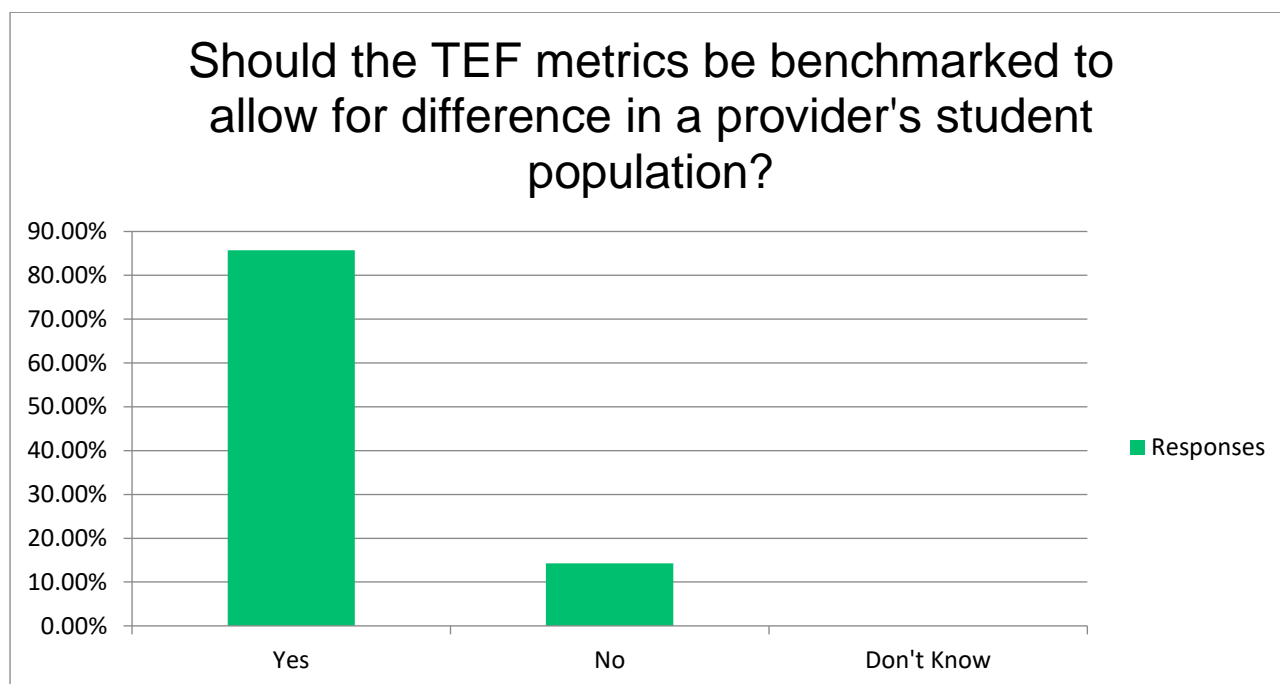
Proposed response: No.

Proposed explanation: As outlined in our response to the previous question, the excessive use of the NSS is a concern due to the subjectivity of students’ views and the fact that most are not in a position to compare differences in teaching quality between institutions. The NSS asks students about their satisfaction with their own lived experiences of teaching which makes comparison across institutions problematic. An additional concern with the use of proxies is that some institutions will have small datasets for some subjects which impacts the reliability of data.

Alternative metrics could be based on inter-institutional peer observation, teaching qualifications/professional development for staff, student to staff ratios, availability of small class seminars and other measures that could provide a better indicator of institutional commitment to long-term excellence.

Q15. The TEF metrics are benchmarked to account for factors such as the subject of study, prior attainment, ethnicity and educational disadvantage of the provider's student intake

- a. Should the metrics be benchmarked to allow for difference in a provider's student population?**
- b. Does TEF benchmark for the right factors?**



Proposed response to Q15a and b: Yes.

Proposed explanation: Broadly speaking we believe that the metrics should be benchmarked to allow for difference in a provider's student population and that the current metrics benchmark for the right factors. There could be a potential benefit in considering the entry criteria of each provider in relation to degree outcomes and DLHE.

To reiterate the point already made in our response to Q13, a particular concern of our members is that employability in TEF now has a 3 weighting and that the three employability metrics are strongly influenced by a university's location. A recent article in *Times Higher Education* (*'TEF metric on graduate earnings reflects distance from London'*) suggests that the LEO metric is biased towards institutions in London and the South-East because the TEF provider data shows that out of 43 English institutions that get a "double positive flag" for the share of graduates earning above the national median wage for 25- to 29-year-olds, well over half (28) were in London or the South-East and none were in the North-West.

Separate graduate destination data suggest that the only two institutions in the North of England that receive the double positive flag on the metric – the University of Leeds and Durham University – simply have relatively high numbers of graduates going on to work in London soon after leaving. These findings would suggest that the majority of graduates remain within the area of their university after graduating and therefore receive a salary closely linked to the average for graduates within the local employment market. Several of our member business schools are adamant that the employability data should be regionally benchmarked as this would be a fairer system for those institutions outside of London and the South-East.

Q16. The TEF process uses both quantitative evidence (for example, the core metrics) and qualitative evidence (for example, the written submission).

- a. What are your views about the balance of quantitative and qualitative evidence considered in arriving at ratings?**

Proposed response: It is important that TEF is underpinned by metrics and not metrics determined, thereby giving institutions the opportunity to improve their overall award through a good, persuasive written submission. Qualitative evidence is important because metrics don't always tell the whole story and certain factors (e.g. geographic location) limit the direct comparability of metrics data across institutions. Institutions with metrics based on small datasets may be more dependent on producing a good written submission which in turn may place a resource burden on those institutions. We would question, however, the scope for a provider's written submission to influence the final rating away from the initial hypothesis unless their metrics data is on the borderline between two ratings.

- b. Are there any other aspects of the process that you wish to comment on?**

Proposed response: Our members are pleased that year 2 of the subject-level pilot will require a 5 page submission for each subject at the level of CAH2. The previous 'model B' pilot exercise grouped subjects together for submission purposes and this did not give each subject the space to give a rich narrative due to page constraints. It may be useful to also consider findings from the United Kingdom Engagement Survey (UKES) instead of just relying on the NSS. This can demonstrate comparability in terms of student views and satisfaction across the whole study period. While our members understand that additional data can help mitigate the weaknesses of existing data sources, it is important that the TEF exercise does not itself detract from teaching.

A general concern is that Economics will be treated as a separate subject under subject-level TEF whereas in many business schools Economics is an integral part of Business and Management provision. During the subject-level pilot some of our members had difficulty in extricating the data related specifically to Economics courses from the overall Business & Management data for the school. The TEF assessment process should afford some flexibility to those business schools who deliver Economics courses.

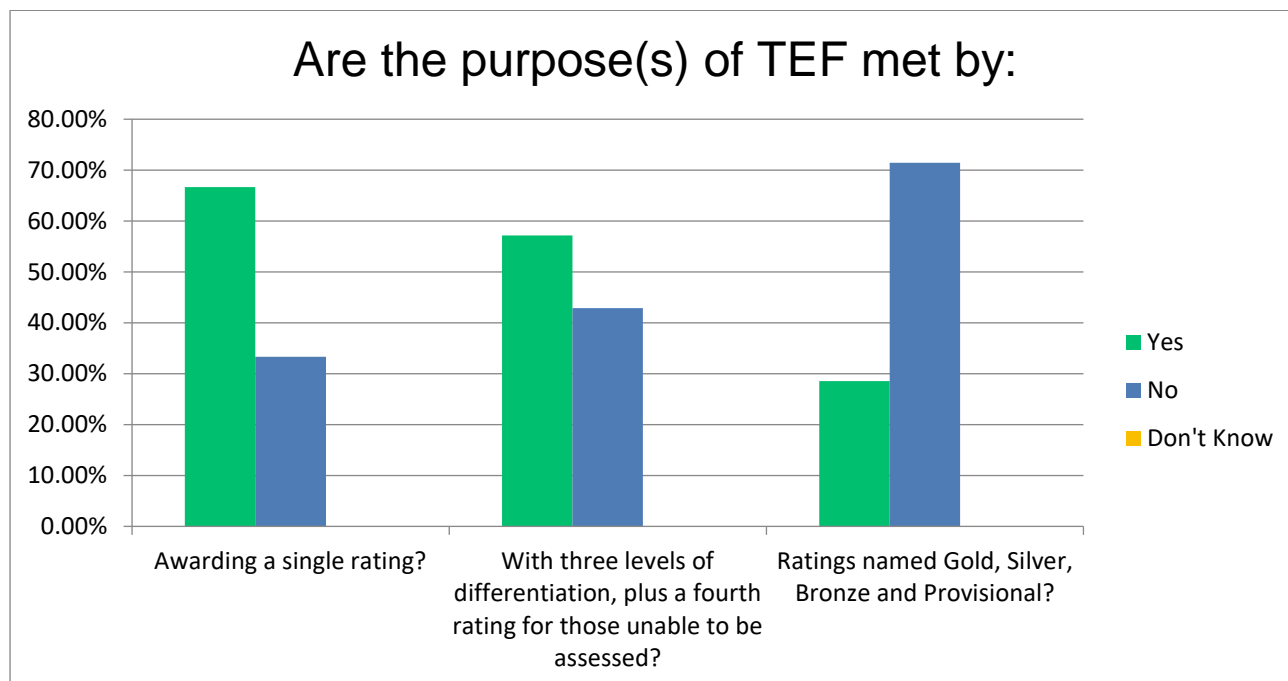
Are the ratings right?

Q17. Are the purpose(s) of TEF met by:

a. awarding a single rating?

b. with three levels of differentiation, plus a fourth rating for those unable to be assessed?

c. ratings named Gold, Silver, Bronze and Provisional?



Proposed response Q17a: Yes

Proposed response Q17b: Yes

Proposed response Q17c: No

Proposed explanation: Given the inherent difficulty in attempting to rate and compare complex organisations it is not clear that increasing the levels of differentiation would improve clarity. Assigning a single ranking to a complex organisation will always be problematic regardless of the number of ranks available. If the overriding purpose of TEF is to provide potential applicants with information then it needs to be as simple as possible for a non-sector expert to understand.

On this basis we support the award of a single rating and a limited range of differentiation levels as anything more complex could confuse prospective students. With that said, an inherent limitation of any such rating system is that there can be no guarantee that the rating awarded to an institution will always match the quality of teaching it delivers (i.e. not every student at a 'Gold' rated school will receive 'Gold' standard teaching).

Our members are concerned about the value-laden connotations of the Olympic style rating system and the possibility that it makes a large number of UK providers appear unduly weak in relation to international competitors. Business schools have the highest share of international student enrolments and our members are understandably concerned that TEF ratings could inadvertently damage the sector's competitive position in the international recruitment market. Careful

consideration is needed as to whether a 'bronze' rating would simply be perceived as bad by potential international students. It could also be argued that there should be a rating below bronze if a provider doesn't achieve a minimum standard.

Q18. If you answered no, what alternatives you would suggest:

a. For provider-level TEF?

b. For subject-level TEF?

Proposed response: For both provider-level and subject-level TEF an alternative to the Olympic style rating system would be a simple set of labels that are less value-laden and competitive: *Outstanding, Exceeds, Meets*. Institutions receiving a subject rating below the minimum could be supervised to ensure the quality of their delivery in that subject improves to the required level. Alongside the rating prospective students may also find it useful to receive a published summary of strengths and weaknesses in each subject.

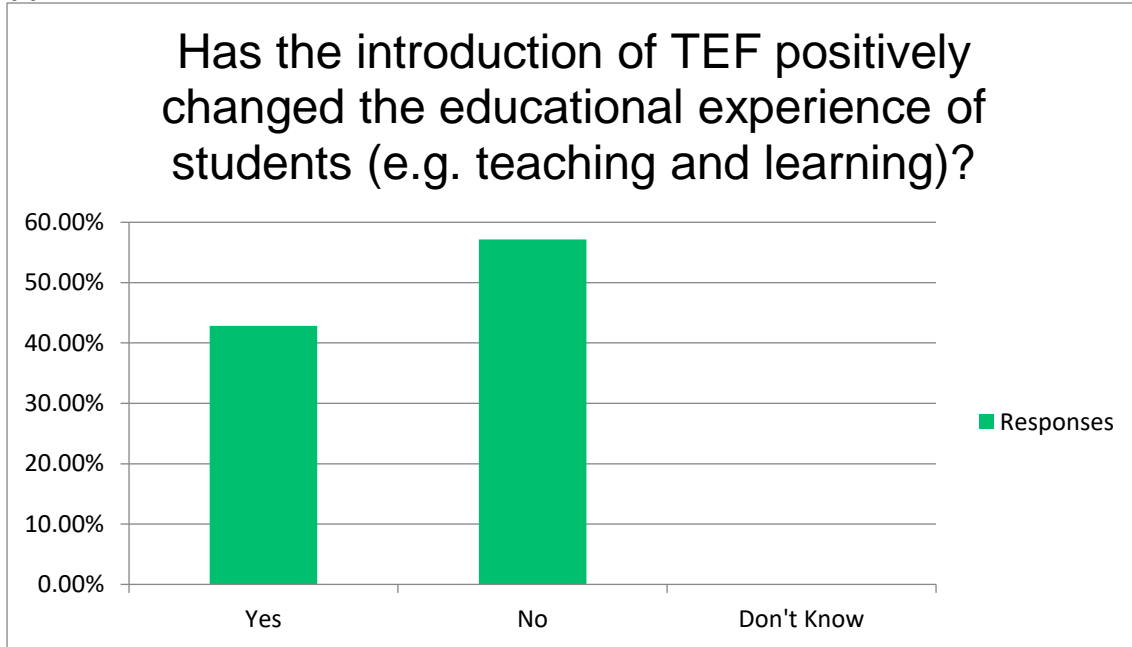
c. If your previous response(s) reflected on the impact of the TEF on the international reputation of institutions and/or the UK as a whole, we would welcome any evidence or information you can provide that might support your view or help inform the independent review.

Proposed response: Most prospective students will not realise the extent to which the UK already has in place a system of quality assurance that does not exist in most competing countries, for example, external examining and evaluation. If a large number of providers are rated 'silver' or 'bronze' it will make them look unduly weak when in most cases such a judgement would not be justified given the quality assurance processes the institutions are subjected to. These quality assurance standards are an opportunity that can be leveraged by the UK HEI sector, and its excellent global reputation should not be undermined by the TEF exercise. Moreover, international students are less likely to understand the nuances intended by the TEF rating system.

Has TEF changed anything?

Q19. Has the introduction of TEF positively changed the educational experience of students (e.g. teaching and learning)?

If yes, how?

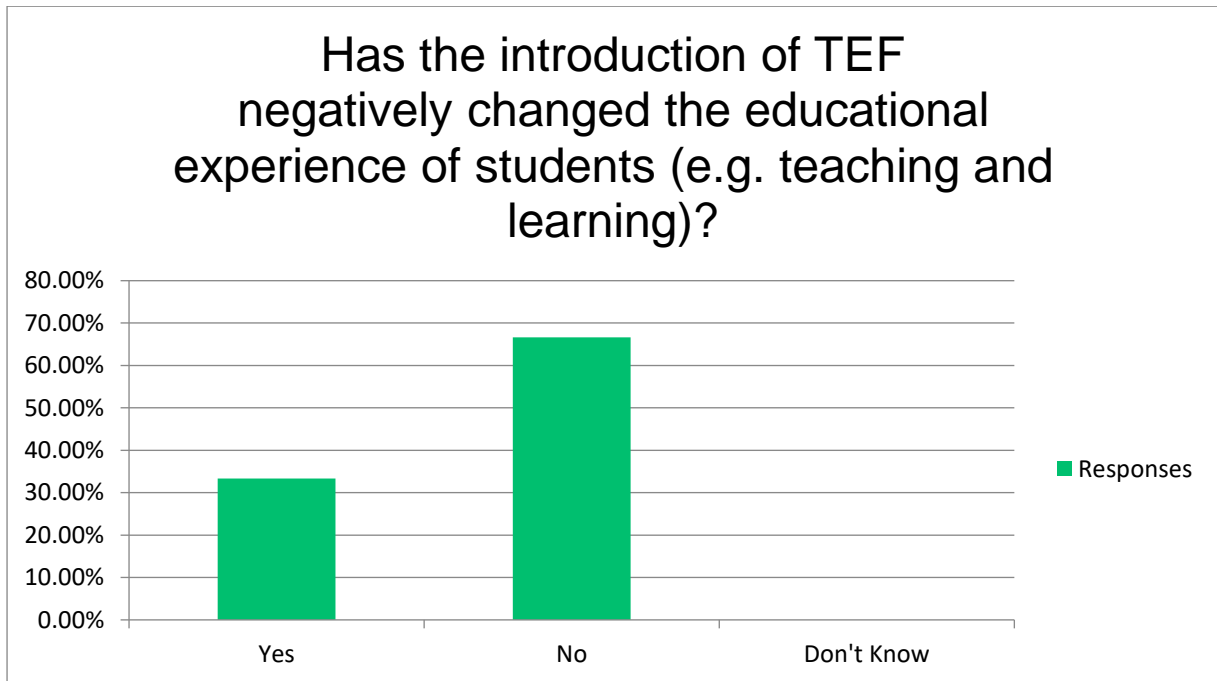


Proposed response: No

Proposed explanation: While slightly more than half of the respondents to our survey felt that the introduction of TEF had not positively changed the educational experience of students, a substantial proportion felt the opposite and cited a number of reasons why this was the case. It is widely felt that TEF has cultivated a renewed focus on learning and teaching in business schools across the sector and that it now features in the daily narrative of educators and senior management teams. This focus has particularly improved assessment consistency, feedback quality and the facilities provided to students. There is also evidence of more funds being devoted specifically for the development of learning and teaching. However, this is clearly not the experience across all institutions.

Q20. Has the introduction of TEF negatively changed the educational experience of students (e.g. teaching and learning)?

If yes, how?

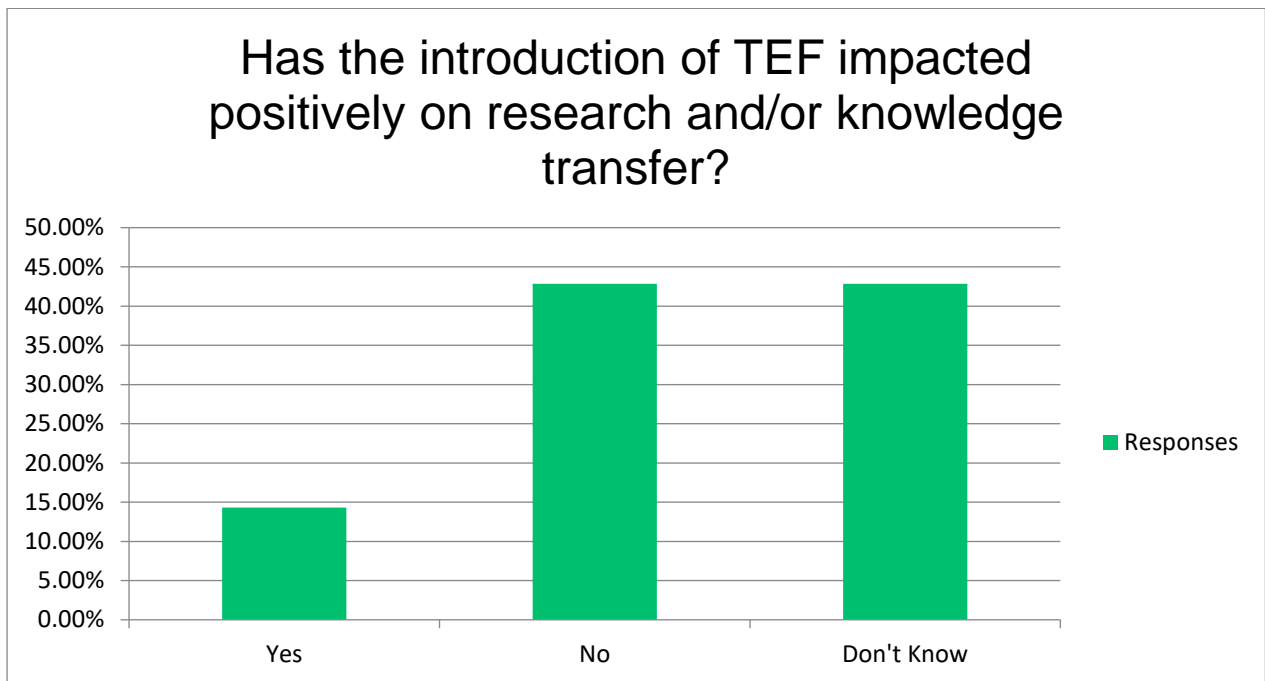


Proposed response: No

Proposed explanation: The broad consensus of our members is that the introduction of TEF hasn't negatively changed the educational experience of students but a couple of unintended consequences have been noted. These are that TEF has led to resources being directed away from student-led activities and that the assessment exercise is selective in what it considers to be 'student experience' meaning that other aspects may no longer be considered a priority e.g. overall course management and timetable scheduling as measured by the NSS. A particularly alarming unintended consequence of TEF are the apparent attempts of some student unions to 'weaponise the NSS' by encouraging their students to give bad NSS scores – and thus a bad TEF rating for their institution – if certain demands are not met.

Q21. Has the introduction of TEF impacted positively on research and/or knowledge transfer?

If yes, how?

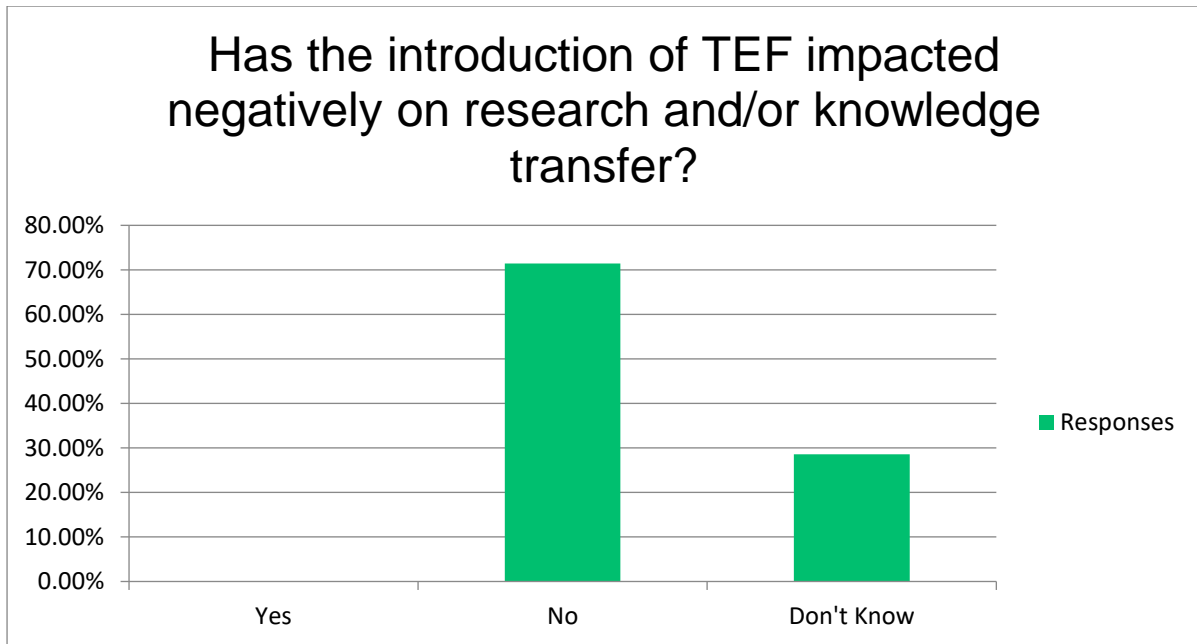


Proposed response: Don't Know

Proposed explanation: Our members are less sure on the answer to this question but there is a feeling that TEF has created an impetus to integrate research and knowledge transfer into teaching and this is largely a positive development. This may take time to be fully realised.

Q22. Has the introduction of TEF impacted negatively on research and/or knowledge transfer?

If yes, how?

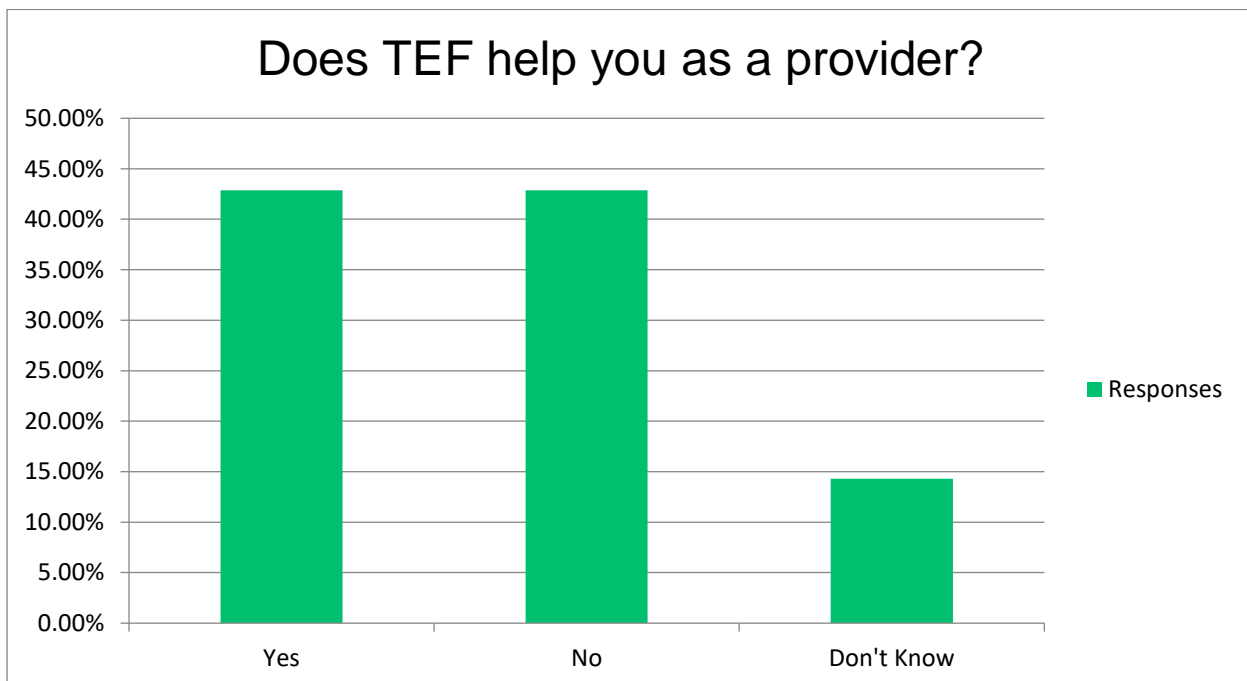


Proposed response: No

Proposed explanation: No evidence of this happening has been given.

Is TEF worth it?

Q23. Does TEF help you as a student/student union/provider/employer/other? Please explain the reasons for your answer.



Proposed response: Yes

Proposed explanation: The split metrics data help business schools to identify strengths and weaknesses in the various split groups and highlight the need for actions to address any potential weaknesses. The TEF also helps to provide staff with a rationale as to why they should invest time in better learning, teaching and assessment.

Q24. Explaining your reasoning, what are the most significant costs of:

a. Provider-level TEF?

Proposed response: Our members perceive the biggest costs of provider-level TEF to be the resources needed to prepare and write the narrative for the qualitative submission. This is perceived as an intensive use of staff time in addition to the numerous data collection activities.

b. Subject-level TEF?

Proposed response: The feeling in relation to subject-level TEF is similar, but with the added cost that low performing programmes could be unjustifiably closed in response to low TEF ratings which may be reflective of small groups of students struggling with certain aspects of the programmes rather than actual overall quality.

Q25. Explaining your reasoning, what are the most significant benefits of:

a. Provider-level TEF?

Proposed response: Provider-level TEF has the potential to serve as a benchmark for overall quality in teaching provision and increase the perception that universities are committed to providing good teaching to students. It shines a spotlight on learning, teaching and student experience, and identifies areas of good practice and areas that need attention. It also helps to raise the profile on how universities can support students in areas such as continuation.

b. Subject-level TEF?

Proposed response: The benefits of subject-level TEF are broadly similar to those of provider-level TEF but with the added benefit that it provides applicants with subject-specific information that is very useful in decision-making.

Is TEF fair?

Q26. Are there particular types of students, provision or providers that are disadvantaged by the current design of TEF, in a disproportionate way?

Proposed response: As mentioned in previous responses, we are concerned that small institutions could be disadvantaged if they are evaluated using metrics data based on small sample sizes. Institutions whose provision is not full-time or delivered off-campus may also be disadvantaged. Several of our member business schools are concerned that the employability metrics favour pre-92 institutions. The TEF metrics in their existing form do not have a measure for learning gain that accounts for students from different educational backgrounds, thus disadvantaging 'vocational' universities.

If so, what changes could be made to address this?

Proposed response: The core metrics data needs to be reviewed to consider some of the issues outlined above, namely small sample sizes, potential biases towards pre-92 institutions and the need to account for students from different educational backgrounds (the latter may require more

detailed/sensitive information about enrolled students). The relative weighting of the metrics should be reconsidered as they are currently skewed too heavily towards employability.

Q27. Are there particular types of students, provision or providers that are advantaged by the current design of TEF, in a disproportionate way?

Proposed response: There is a perception amongst some business schools that TEF will favour larger institutions with the resources to invest in creating high quality submissions. Institutions whose students give them favourable NSS scores will also naturally be advantaged.

If so, what changes could be made to address this?

Proposed response: No comments provided by members.