



## Teaching Excellence and Student Outcomes Framework: Subject-Level Consultation

In March 2018 the DfE published a consultation on the Subject-Level Teaching Excellence and Student Outcomes Framework. As they state, ‘This consultation is an opportunity for all stakeholders, including students, providers, employers and sector bodies to comment on the proposed design of subject-level TEF. Findings from the consultation will ensure the design of subject-level TEF is informed by a thorough evidence base.’ For the full consultation document, see [here](#).

Here is the Society’s response to its sixteen questions.

### 1. To define ‘subjects’ in subject-level TEF, do you:

- a) **agree with using level 2 of the Common Aggregation Hierarchy as the classification system (CAH2, with 35 subjects), and if not, what other systems could be used and why?**

We think CAH3 is preferable to CAH2 for our discipline. One of the four objectives of TEF is to better inform students’ choices about ‘what and where to study’ (*Teaching Excellence Framework: Subject-level pilot specification*, DfE, July 2017, p. 7) which will not be helped by adopting CAH2, since it puts together History and Archaeology. It is true that about 35 UK HEIs offer joint degrees in History and Archaeology, but numbers tend to be small and the vast majority of History and Archaeology students take single not joint honours degrees. The disciplines are quite distinct: history’s emphasis on independent learning and engaging with primary texts of the written word and images contrasts with the centrality of field work, post-excavation and laboratory techniques to archaeology. The LEO data of the two disciplines are quite different too, with historians generally earning more. Thus to conflate the two serves the interests of potential students in neither history nor archaeology. Subject-level CAH 3, ‘History’, would provide metrics and subject-level provider submissions which would help students pick the course at the university most suitable for them.

- b) **think that specific changes or tweaks need to be made to the definition of the 35 subjects in CAH2, or to the 7 subject groups used in Model B, and if so, please explain why?**

For specific changes to CAH2, see our answer above. We accept the case for 7 subject groups in order to ‘streamline the assessment process and reduce the burden for both panel members and providers’ (*TEF: Subject-Level Technical document*, 4.12).

### 2. Do you agree that we should have a longer duration and re-application period in subject-level TEF?

Since we favour Model B, which is more labour-intensive with a likely assessment process of more than a year (*TEF: Subject-Level Technical document*, p. 12) and we are conscious of value for money, we back the second option: assessment every two years, with a duration of six years and re-application every four years.

**3. Should subject-level TEF retain the existing key elements of the provider-level framework (including the 10 TEF criteria, the same suite of metrics, benchmarking, submissions, an independent panel assessment process and the rating system)?**

While the Society has reservations about the current design of TEF (see our answer to Q.16), we strongly endorse the qualitative evidence submitted at both provider- and subject-level, which will be assessed by an independent panel. The latter contains the vital element of peer-review, which (as with REF) we regard as the best form of assessment.

**4. For the design of subject-level TEF, should the Government adopt:**

- A ‘by exception’ approach (i.e. a form of Model A), or
- A ‘bottom up’ approach (i.e. a form of Model B), or
- An alternative approach (please specify)?

We favour Model B. This would provide prospective students with the clearest information (via the provider- and subject-level submission, the report of the panel plus the rating) on the greatest number of subjects.

**5. Under Model A, do you agree with the proposed approach for identifying subjects that will be assessed, which would constitute:**

- a) the initial hypothesis rule for generating exceptions from the metrics?
- b) allowing providers to select a small number of additional subjects?

Were Model A to be adopted, we would favour providers selecting additional subjects, in the interests of making available more subject-specific results and reports to potential students.

**6. In Model A, should the subject ratings influence the provider rating?**

We think it should, so long as the adjustment process is accessible and intelligible, avoiding confusion to students and ensuring that the final provider-level rating accurately reflects the quality of teaching at that institution.

**7. In Model B, do you agree with the method for how the subject ratings inform the provider-level rating?**

We do, since it is logical and transparent.

**8. Do you agree that grade inflation should only apply in the provider-level metrics?**

We do, since we accept that decisions around grade boundaries are best examined at the institutional not subject-specific level.

**9. What are your views on how we are approaching potential differences in the distribution of subject ratings?**

We back the proposal: the ratings are which awarded should be evidence-led; there is no necessary reason why different subjects should have the same distribution of outcomes; and once again the premium should be on giving potential students the clearest information under the rules as currently devised.

**10. To address the issue of non-reportable metrics:**

**a) do you agree with the proposed approach?**

**b) when assessment occurs, do you prefer that assessors:**

- **rely on group metrics alongside any reportable subject-level metrics?**
- **rely on provider metrics alongside any reportable subject-level metrics?**
- **follow an alternative approach (please specify)?**

This is unlikely to affect history, so we will not offer an opinion here.

**11. Do you:**

**a) agree that QAA Subject Benchmark Statements and PSRB accreditation or recognition should remain as a voluntary declaration, and if not, why?**

We believe that the history benchmark statement should be a point of reference for subject-level submissions, and providers should be explicitly encouraged to make reference to it. However, given the very diverse ways that history is taught, which the benchmark statement acknowledges, it would be inappropriate to require providers to use it to frame their subject-level submissions.

**b) think that there are any subjects where mandatory declaration should apply?**

Since this isn't applicable to our discipline, we do not offer a view on this.

**12. Do you agree with our approach to capturing interdisciplinary provision (in particular, joint and multi-subject combined courses)?**

We accept the case for not offering separate ratings for joint programmes. This is an additional reason in favour of Model B since it means a prospective student can find specific information about both elements of an interdisciplinary degree which might not be available under Model A, were one or both deemed 'non-exceptional' or were not submitted as an additional subject. We note that in History, joint degrees are offered with a wide range of departments, often across Social Science and Humanities faculty lines (with, for example, Art History, English, Modern Languages, International Relations, Politics, and Sociology).

**13. On balance, are you in favour of introducing a measure of teaching intensity in the TEF, and what might be the positive impacts or unintended consequences of implementing a measure of teaching intensity?**

On the one hand, we welcome some element of teaching intensity, since it adds an element of 'teaching' into the assessment process which has been diminished by the reduction of NSS core metrics from 50% to 33% in TEF3 onwards; moreover, these core metrics are primarily

proxies for teaching, and a component of ‘teaching intensity’ breaks new ground in addressing inputs rather than (perceived) outcomes. One benefit would be that students could compare and contrast the proportions of their contact hours that are in small and large groups. A likely unintended consequence will be the addition of ‘empty hours’ of ‘contact’ (for example, scheduled library time with a postgraduate tutor available for consultation) to inflate ‘intensity’ scores. We fear that any teaching intensity metric will result in significant game playing. More broadly, the focus should be on the quality of teaching not its quantity, and to privilege contact hours runs the very great danger of perverse or unforeseen consequences. The prime responsibility of teaching history undergraduates is to encourage them to develop their skills and understanding as independent learners, which can only suffer if attention and resource will be concentrated on teaching intensity. Secondary school league tables, and the pressures to achieve good A level results, have produced a generation of undergraduates used to directed teaching and learning, and we have to wean them off this culture of academic dependence. Encouraging greater teaching intensity will make this all the harder to achieve.

**14. What forms of contact and learning (e.g. lectures, seminars, work based learning) should and should not be included in a measure of teaching intensity?**

The rich diversity of teaching needs to be acknowledged were a teaching intensity metric to be adopted.

**15. What method(s)/option(s) do you think are best to measure teaching intensity? Please state if there are any options that you strongly oppose and suggest any alternative options.**

We do not believe that any of the six options comes close to measuring the quality, rather than the quantity, of teaching. Our preference would be to move away from metrics towards a supplementary submission, from both students (adumbrated in option 2) and their teachers, whose qualitative claims can be verified. The most unacceptable suggestion is in option 3: that the seniority of the teacher could be a proxy for the quality of the teaching. We know of no data that would support such a proposition, and our collective experience is that the brightest and most effective teachers can be found in any rank of the profession. It is obviously important that the sector has confidence in the TEF and this option would damage the credibility of any teaching intensity metric.

**16. Do you have any other comments on the design of subject-level TEF that are not captured in your response to the preceding questions in this consultation?**

The Society endorses the objectives behind TEF to better inform students’ choices about what and where to study, to raise esteem for teaching and to recognise and reward excellent teaching. However, we do not believe that the mechanisms chosen to pursue these objectives are well-chosen. The NSS metrics are inadequate proxies for the teaching experience offered by many universities, and there is an imperfect relationship between university teaching and both retention and LEO data. We will be making these points, at greater length, to the forthcoming Independent Review.