Response to Independent Review of the Teaching Excellence and Student Outcomes Framework (TEF)

Introduction

Section 26 of the Higher Education and Research Act (2017) provided for an independent review of the Teaching Excellence and Student Outcomes Framework (TEF). The State of Secretary for Education appointed Dame Shirley Pearce of the LSE to conduct this review, supported by an advisory group, and she issued a Call for Views on 18 January 2019, with a closing date of 1 March 2019. Here is the Society's response.

Please note that the answers to Qs 1-9 have been omitted, since they relate to details about who is making the submission.

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

We do support measures to assess and encourage teaching excellence. The Royal Historical Society speaks on behalf of over 4300 Fellows and Members, with Fellows in every history department across the country. We actively advocate the best teaching practice in both HEIs and secondary schools. To facilitate this we have an Education Policy Committee which meets three times a year; we work closely with the Historical Association, The Institute of Historical Research, History UK (HE) and the ‘A’ Level awarding bodies; we have two prizes awarded annually for inspirational and innovative teaching; and we are devising a teaching portal for our website to assist teaching history at undergraduate and postgraduate level in HEIs. The challenge is not whether but rather how best to assess quality. As we indicate below, we are sceptical of the proxies currently used in TEF to assess ‘Teaching Quality’ and ‘Learning Environment’. We would also welcome an examination of the quality of ‘student outcomes’ were this phrase to go beyond the DLHE and LEO metrics to consider the broad value of a university education including a history degree to individuals and to society, including the acquisition of critical analytical skills, humane and ethical qualities and participation in civic society. Such an assessment would require qualitative judgements rather than quantitative data.

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1 Information about the Review and the full Call for Views document is available here: https://consult.education.gov.uk/higher-education-reform/independent-review-of-tef-call-for-views/supporting_documents/TEF_review_Call_for_views.pdf
11. The purposes of TEF fall into two main areas: providing information, and enhancing the provision of higher education.

a. Which of these is the most important:

- In our view, enhancing provision

b. Please outline below the reasons for your answers.

RHS officers and councillors annually spend many hours each year at open days, meeting hundreds of prospective students and parents/carers. We also teach undergraduate students throughout their courses of study. We know of no evidence that a significant proportion of students are currently making poor choices when picking their subject or university. KIS data is only infrequently and partially mentioned at open days by prospective students and their parents: contact hours constitutes the main topic on which they tend to focus. Very little interest, and less understanding, of TEF metrics is at present manifest in this context.

Nor do we think Subject-Level TEF will provide meaningful information to prospective history students. The decision to use CAH2 subject classification means that history provision will be considered alongside history of art, architecture and design, archaeology, heritage studies and classics. Core metrics will not be separated out for each of these disciplines, and since the subject-level submission is likely to be no longer than five pages, it may well consist of a commentary on the core metrics, or else be structured thematically across several disciplines. There will be little in the submissions, or the panel judgement upon them, to help a potential applicant in history, while the metric data is likely to impenetrable to most applicants. We do not think that TEF represents a significant improvement on the information currently available.

We welcome initiatives which ‘raise esteem for teaching’ and ‘recognise and reward excellent teaching’. TEF has raised the profile of the teaching and student outcomes agenda at strategic level in HEIs, with new revenue streams directed towards issues such as retention, employability, attainment and widening participation. It also offers some balance to research-driven measures associated with the REF. However, we remain unconvinced that TEF, as it is presently configured, is best suited to enhance teaching and learning provision.

12. Should there be any other purposes for TEF?

The TEF submissions contain a rich source of information on teaching excellence, and we would support ways in which some of these current practices, approaches and opportunities in each discipline might be highlighted and disseminated, perhaps in co-operation with a body equivalent to the former Subject Centres for the HEA. The loss of the HEAs has removed an important mechanism for sharing disciplinary skills, knowledge and expertise that can inform teaching enhancement. In times past, too, QAA did valuable work in promoting good practice and innovation.

13. Are the criteria used in TEF appropriate? If not, what criteria would be more appropriate?

Many of the criteria for assessing ‘Teaching Quality’ and ‘Learning Environment’ are sensible enough, in themselves. We welcome the inclusion of ‘student partnership’, now being tested in
the subject-level pilot, since teaching and learning is, at its heart, a collaborative venture between teachers and students. However, at both provider and subject level, we would welcome an additional criterion of ‘learning gain’ rather different from that proposed in SO1-3: in other words, the ways in which the student’s knowledge, skills and independent learning in each subject have been developed by their study at an HEI. At present, this is deduced from the career they chose to pursue and the income they have earned. As is well known (and well evidenced) these choices are often influenced by social background, ethnicity, gender, connections and geography, as well as or more so than the subject and/or university at which students studied. ‘Learning gain’ is a developing pedagogical field, but it has the merit of engaging directly with student progress in HEIs. See, for example, the forthcoming report of the National Mixed Methodology Learning Gain Project (https://www.officeforstudents.org.uk/advice-and-guidance/teaching/learning-gain/national-mixed-methodology-learning-gain-project/).

14. 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?

We are concerned that the NSS core metrics indicate student views on teaching rather than teaching itself, which makes them inadequate proxies to assess ‘teaching excellence’. Significant studies have pointed to substantial levels of bias in student evaluations of their individual tutors. We lack comparable studies on the effect of biases such as these on student evaluations of their degree programmes as a whole, and the absence of such scrutiny weakens our confidence in the NSS data on which TEF relies so heavily. It is also perverse to assess ‘teaching excellence’ by primarily relying on the views of ‘learners’: surely teachers themselves (in the spirit of peer review and the external examining system) should have a direct voice in TEF? At present their role is limited to contributing to subject-level submissions which, inevitably, focus on the core metrics rather than on pedagogical philosophy and practice, innovative methods of teaching, assessment and so on. It is also a manner for regret that there is no acknowledgment in the metrics about the value of research-led teaching, which is distinct to university teaching. As noted under Q.13, we also believe that there is an imperfect relationship between teaching history at university and ‘student outcomes’ based on DLHE and LEO data, which is not acknowledged in the TEF proposals.

b. If you answered no, what metrics would be more suitable proxies?

We would favour a core metric which engaged more directly with the impact of teaching and the acquisition of learning, so a solution would be devising a statistically sound metric for learning gain, as noted in answer to Q.13. We also share the unease expressed by the Royal Statistical Society at the statistical flaws they have identified in TEF (Journal of the Statistical Society, 181 (2018) pp. 923-5), and we welcome the scrutiny of TEF’s statistical methodology by the ONS. Accordingly, we believe there is considerable merit in finding other ways with which to assess teaching quality and to drive up teaching standards rather than relying on metrics. Scottish HEIs use an annual internal audit each year, which addresses quality assurance and enhancement, the results of which are submitted to Scottish Funding Council. It uses the external assessors,
empowers the student voice, promotes collegiality, and allows a dialogue between reviewers, staff and students over methods of teaching and the best use of resources for the benefit of students. Our consultations with Scottish RHS Fellows of the Society suggests that this system commands wide respect in the sector.

15. 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?

We believe they should.

b. Does TEF benchmark for the right factors?

We believe it does.

16. 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?

We are unconvinced that quantitative evidence based on proxy data fulfils TEF’s stated purposes of providing information and enhancing teaching. Equally, 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. We would welcome, therefore, much greater weight being placed on submissions, with History being treated as a separate subject (CAH3) and given appropriate space in order to demonstrate, with supporting and verifiable evidence, the teaching culture of each unit and the ways in which teaching standards have been enhanced with reference, where appropriate, to the history benchmark statement. CAH2 at present bunches History together with a number of very different disciplines, such as Archaeology, which has its own disciplinary norms in terms of teaching, underpinning premises and conceptual framework, which will be largely concealed in the short subject-level submissions now being proposed – a conflation which does no justice to either History or Archaeology. The LEO data is quite different for the two disciplines, and to run them together will not provide accurate information for potential students, which is a central purpose behind TEF.

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

No.

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

a. awarding a single rating?
Our view is there should be a separate rating for individual disciplines (in our case, History as a single subject according to CAH3 subject classification).

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

This seems reasonable.

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

This is a matter of taste. The ‘Olympic’ medals have been the target of some ridicule, and may convey the impression that TEF is intended to put providers and subjects in competition with others from different HEIs. An alternative classification could well be ‘Outstanding’, ‘Good’ and ‘Satisfactory’. What matters more to us is the application of the criteria on which ratings are made is intelligible and transparent, as well as a clear statement of what TEF is not judging – namely the practice of research-led teaching and the wider university experience for students. It is clear, for example, that neither prospective students nor their parents/carers/teachers understand the place of benchmarking in TEF Gold, Silver and Bronze evaluations. There is a real danger that TEF ratings will mislead applicants, at home and abroad, and confer reputational damage some universities and some subjects within them.

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

a. For provider-level TEF?

b. For subject-level TEF?

See our answer to Q.17.

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

If yes, how?

TEF was introduced in 2016 and we have noted above (no. 11) that it has resulted in greater resource being directed to teaching. Subject-level TEF is being piloted in 2017-19 and the core metrics for our discipline (along with others in CAH2) are only now being analysed, so from a disciplinary perspective it is unclear to us that students in history have directly benefited from TEF; so our view is here and for Q.20 it is too soon to offer an informed judgement. It is also curious to assess TEF while subject-level investigation is still taking shape, at a time when its benefits and shortcomings cannot be fully understood.

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

If yes, how?

As stated in our answer to Q.19, we believe it is soon to tell.
21. Has the introduction of TEF impacted **positively** on research and/or knowledge transfer?

We do not see any evidence in History to suggest that it has.

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

We do not see any evidence in History to suggest that it has.

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

As a disciplinary body, we have grave doubts that TEF as currently devised will achieve its four purposes. As noted in our answer to Q.13, we do not think TEF addresses a real problem in history (that potential students need more information) and that the reliance on proxies of student views rather than robust information on ‘Teaching Quality’ and ‘Learning Environment’ provides potentially misleading data and awards to applicants. The link to DHLE and LEO also implies an easy correlation between the subject studied and the career and income which follow, without the intervention of other, often more significant factors. It follows that TEF as currently proposed will not capture the real benefits associated with studying history at one provider rather than another.

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

a. Provider-level TEF?

This is beyond our remit as a learned society.

b. Subject-level TEF?

See our answer to Q.23.

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

a. Provider-level TEF?

This is beyond our remit as a learned society.

b. Subject-level TEF?

We would welcome a remodelled TEF, which assessed history teaching in HEIs based upon actual practice, and took account of ‘learning gain’ and which encouraged the spread of better and best pedagogical practice. We have in mind a model not dissimilar to that currently used in Scottish HEIs (see answer to Q.14b).

26. Are there particular types of students, provision or providers that are disadvantaged by the current design of TEF, in a disproportionate way?
If so, what changes could be made to address this?

No comment.

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

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

No comment.

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