

TEF independent review: Response

February 2019

Executive Summary

This response is submitted on behalf of the University of Cambridge, the Cambridge University Students' Union and the Cambridge Graduate Union.

Our response has been informed by the University's participation in TEF1 and TEF2 and the subject-level pilot 2017-18.

The University and its student unions have significant reservations about the direct relevance of the TEF metrics to measure teaching quality and to assess the wider educational experience. We also have concerns that the design of the TEF (particularly the benchmarking methodology) means that the TEF is unable to measure and rate absolute quality of provision across institutions. The benchmarking methodology applied at present in fact makes it more difficult for providers demonstrating a very high level of quality in absolute terms to attract a 'gold' rating.

These two salient limitations of the TEF inevitably constrain the usefulness of TEF ratings to students, employers and providers. The TEF ratings of 'bronze', 'silver' and 'gold' are likely to be particularly unhelpful and confusing for international audiences. For example, prospective international students' perceptions of the quality of UK higher education may be diminished by the use of 'silver' and 'bronze' ratings – especially where benchmarking prevents providers otherwise understood as 'gold standard' from obtaining a 'gold' TEF rating.

The Collegiate University of Cambridge is committed to enhancing educational provision and to maintaining its global reputation for excellence. This commitment exists regardless of TEF. Our experience is that the TEF does not act as a 'driver' for improvements in education and teaching quality at Cambridge. In fact, the TEF has distracted staff from their work in enhancing that provision. We have significant concerns that subject-level TEF will only compound this diversion and draw valuable resource away from enhancing teaching and the educational environment, with no clear benefits for students.

Questions from the Call for Views

1. What is your name?

Professor Graham Virgo QC

2. What is your role/position (if relevant)?

Senior Pro-Vice-Chancellor for Education

3. What is your email address?

Graham.Virgo@admin.cam.ac.uk

4. In what capacity are you responding to this consultation?

On behalf of a higher education institution.

5. Are you responding on behalf of an organisation (eg. higher education provider, student union or representative group)? a. If yes, what is the name of your organisation?

The University of Cambridge.

b. If you are responding on behalf of a provider, has the response been approved by the governing body (or equivalent)? The Independent Reviewer requests that provider responses have been considered by their governing body in view of the importance of her review.

Yes – by the University Council.

6. Have you been involved in preparing for or writing a TEF or subject TEF submission?

Yes.

7. Have you been a TEF assessor or panel member (for provider TEF or in the subject pilots)?

No.

8. Would you like us to keep your responses confidential? If so, what is the reason for confidentiality?

No.

9. Please indicate which UK country/other country you are responding from.

England.

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

The Collegiate University and its students' unions (Cambridge University Students' Union, CUSU, and the Cambridge Graduate Union, GU) are supportive of efforts to encourage, and to assure, teaching quality and positive student outcomes at both undergraduate and postgraduate levels. Consequently, we have welcomed the focus of initiatives that seek to raise the profile of teaching at university.

However, there are important differences between the objectives of i) *assuring* quality (for example, through QAA's safeguarding of standards), ii) *encouraging* providers to enhance their provision, and iii) *assessing* teaching excellence and student outcomes. There are also different ways through which an assessment of quality may be attempted; TEF judgements and ratings are one example. We do not consider that there is any satisfactory way of *objectively* assessing the quality of education, as this always requires some subjective judgement.

Some of the data and information that inform TEF judgements might potentially be of some use and relevance to prospective students when they come to consider their post-18 education options. It is not, however, clear that an extra layer of *assessment* of student experience and student outcomes at either provider or subject level adds any value to applicants or students, or assists their decision-making. In fact, the assessments and rankings may even confuse this process. This is compounded by the unreliability and inappropriateness of the TEF metrics as direct measures of teaching excellence and the educational experience, and the reductionist nature of attempting to give an institution (or, in subject level TEF, a subject) a single rating.

Particularly relevant here is the effect of the use of benchmarking (as opposed to absolute values) in obscuring the absolute level of quality provided by some institutions.

Attempts to repeat the TEF exercise at subject level carry the same issues as at institutional level, but are also fraught with difficulties arising from data with small sample sizes and the definition of 'subject'. Indeed, we have concerns that the use of subject groups in subject level TEF will not be transparent to students. Further, the use of JACS codes for the mapping of courses to subjects does not reflect our interdisciplinary provision, for example the Natural Sciences Tripos.

11. 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.

These purposes fall into two main areas: providing information, and enhancing the provision of higher education.

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

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

Both are equally important objectives, but we consider that the TEF fails as regards both. The information provided to students is blunt and misleading. In our experience the TEF has had no

impact at all on enhancing provision, and in fact, because of the administrative demands, it has distracted staff from their work in enhancing provision.

b. Please outline below the reasons for your answers

Both objectives are important for students: the question is whether the TEF is an effective instrument for achieving them.

Making relevant information available to students (and presenting and explaining this information clearly) is an important endeavour and can help to ensure students are able to make appropriate decisions in line with their individual aspirations and priorities. In terms of providing information, applicants and students are already able to access the TEF metrics data (and a wider set of data) from publicly available data sources, such as UniStats, so it is not clear what value is added by the TEF as a source of useful and accessible information. The TEF attempts to combine many pieces of information into a single, simplistic rating which is not in itself meaningful, and indeed is potentially misleading to applicants.

We do not have any evidence to suggest that applicants, current students or employers are making use of providers' narrative submissions towards their decision-making.

We are not convinced that the TEF offers the University of Cambridge any reputational incentives to 'enhance provision'. The Collegiate University has been and continues to be determined to enhance educational provision, and to maintain our global reputation for educational excellence, and the existence of the TEF has had no impact in this regard.

We are also concerned that the TEF's focus misses crucial elements of the wider student learning and educational experience: despite the fact that students (as well as employers) value skills and knowledge derived from the entire university experience. Without consideration of a provider's broader learning environment, welfare support and opportunities for personal development, there is a risk that the TEF creates adverse incentives for higher education providers which are not aligned with enhancing provision across the educational experience.

12. Should there be any other purposes for TEF?

There is already fundamental confusion as to what the TEF ought to be achieving; therefore we would not recommend the identification of any additional purposes until there is clarity about what the essential purpose of the TEF actually is.

13. Are the criteria used in TEF (see Figure 1 for a list of the criteria) appropriate? If not, what criteria would be more appropriate?

The criteria for Teaching Quality (student engagement with learning, valuing teaching, rigour and stretch, assessment and feedback, student partnership) are not relevant to teaching quality but are relevant to the broader educational experience, covering teaching and eLearning. One

of the flaws of the TEF is that its name suggests that it is about teaching excellence, whereas the focus should be on educational excellence. Education at university involves much more than teaching.

We would also emphasize that indicators and metrics seeking to measure these criteria will map differently on to different subjects and courses. Students will have different concerns if they are interested in studying a professional programme such as medicine, compared with studying pure science, or the arts and humanities, and these need to be reflected in the metrics.

We are broadly content with the criteria for Learning Environment (resources; linkages between teaching, scholarship, research and professional practice; and personalised academic experiences). As noted in our response to the TEF Technical Consultation (2016), we would recommend (i) that the reference to the evidence for tailoring of academic experiences includes attainment and progression as well as retention; and (ii) that welfare support (including provision to support mental health and wellbeing) is specifically included as a key aspect of Learning Environment.

The criteria covering Student Outcomes are also broadly acceptable (employability and transferable skills; employment and further study; positive outcomes for all), although the criteria should refer to outcomes achieved *by* (rather than *for*) students from all backgrounds. We would emphasise that student outcomes cannot be narrowed to employment and salary metrics; they should also encompass whether students go on to achieve their own goals and the extent to which the educational experience provided by their university supports them to acquire work-relevant and life skills.

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 (see Figure 1 for a list of the criteria and metrics)?

Student satisfaction

We have significant reservations on student satisfaction as a measure: there are clearly tensions between levels of student satisfaction and a need to stretch and challenge, whilst ensuring the maintenance of standards. We are not convinced of the reliability of NSS scores, and believe there is a risk of game-playing by providers, particularly when broken down to subject-level.

CUSU has advocated the boycott of the NSS because of concerns about the use of NSS data in the assessment of providers as part of the TEF, initially with a particular concern that this might become linked to the level of tuition fees charged, and subsequently arguing that the link between NSS responses and actual teaching quality is insufficiently strong to be used to assess

and rank providers in relation to each other. As a consequence, our NSS response rates have fallen, such that they have not been reportable for the last two years, in turn reducing the reliability and usefulness of this data as a TEF metric.

Graduate Outcomes

We have particular concerns about the reliability of data from the new, largely untested Graduate Outcomes survey (which replaces the DLHE survey), not least in terms of sample sizes given the current response rates.

The data that underpins the Longitudinal Education Outcomes (LEO) is at a significant remove from teaching quality; it is primarily a reflection of the graduate labour market, and indeed the graduate labour market several years ago. It is intrinsically difficult to separate the role of teaching inputs from the influence of other factors, including the geographical destinations of graduates (which have a particularly strong bearing on salary outcomes) and graduates' socio-economic backgrounds.

On a related point, whilst salary may be influenced by the type of job taken, the TEF should make no assumption that salary is the sole indicator of a successful career or of teaching excellence. Indeed, inspired teaching might even encourage students to get wider life experience or focus on making a wider contribution to society, rather than immediately enter a high-paying position. This is not captured or appreciated in the TEF's student outcomes metrics.

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

It does not appear to us that any metrics exist that can accurately measure or capture teaching quality. The TEF's reliance on "proxies" itself points to the fundamental inability of the TEF to reflect teaching quality directly.

CUSU has suggested that learning gain might be a useful set of data, if an accurate means of measuring it can be found.

However, we are aware that, despite the considerable amount of work on learning gain metrics that has taken place, there is currently no credible metric for measuring learning gain in a consistent way across the sector. There is also a risk that crude metrics (e.g. the relationship between entry tariff and degree classification) discriminate unfairly against institutions such as Cambridge that have high levels of attainment on entry, and would be a further encouragement of grade inflation.

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 (see that 'What is TEF?' section for detail).

a. Should the metrics be benchmarked to allow for difference in a provider's student population?

We are concerned that benchmarking obscures the data from a student perspective, and consequently undermines the objective to provide reliable and useful information to students. It is not necessarily clear to prospective students (UK and non-UK) that the TEF differs from other information sets and traditional league tables in rating and ranking providers according to their performance against a benchmark, rather than their performance in absolute terms.

The use of benchmarking as opposed to absolute values is particularly problematic for providers like Cambridge which are being compared with others with high absolute scores, which fall within a narrow range; we are concerned that in these cases, benchmarking masks the real quality.

A mechanism has been introduced to identify the top 10% of provider scores for each metric in absolute terms, but these markers of absolute value do not directly contribute to the final TEF ratings. Again, this obscures the absolute quality delivered by providers (for example, very high retention rates which do not attract a positive flag). Providers demonstrating very high quality should not be penalised by the benchmarking methodology when it comes to the hypothesis and TEF rating.

Benchmarking itself is also an implicit recognition of the factors (such as entry tariff, socio-economic background and geography) which can influence student outcomes, which are outside of the inputs measured by the TEF metrics: in other words, it points again to the distance between what the metrics are capable of capturing, and the actual teaching and education inputs.

b. Does TEF benchmark for the right factors?

Subject to the comments above and our concerns about the effects of obscuring absolute quality, the factors taken into account are appropriate.

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?

The quantitative metrics alone cannot capture all aspects of a university education or of teaching quality and the learning environment. Therefore, it is appropriate to supplement this with qualitative evidence in the form of a provider's submission. This qualitative strand is also better suited to recognising the differences between providers and therefore the diversity of the UK higher education sector.

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

We have concerns that the assessment sequence (performance in the metrics, followed by submission) means that the submission becomes, in effect, an invitation to the provider to account for the provider's performance in the quantitative metrics, rather than an opportunity to explore additional evidence against the TEF criteria.

It remains unclear how the TEF will in future relate to other national exercises including QAA review.

17. 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? Please explain your answers.**

- a) A single rating to attest to quality - for example, the model of a TEF as a kite-mark of teaching (or learning/educational) excellence - would in our view be much more appropriate in encouraging and recognizing quality across the sector, without imposing too great a burden on providers, creating confusion among students and employers, or causing potential reputational damage internationally.
- b) We are not convinced of the need for three levels of differentiation, plus the fourth rating for those unable to be assessed. Students and employers should be able to use available information to form their own decisions as to which providers and courses best align with what they want from their educational experience at university - and beyond. Differentiation also becomes an attempt to rank providers comparatively in relation to one another across a common set of metrics, when each provider has a very different offer to prospective students. This heterogeneity is a vital strength of the UK's higher education sector. The TEF is a very blunt instrument to reflect the quality of education.
- c) It is not clear what useful additional information is provided to students (or providers themselves, or employers) by labelling providers 'gold', 'silver', 'bronze' and 'Provisional'. These are strong judgements to bestow on institutions on the basis of incomplete and imperfect proxy measures.

It is a particularly counter-productive use of student fees and public resources to undertake an exercise that culminates in some providers being labelled as 'bronze' (or 'provisional' - a term which by itself is unlikely to be understood), given for example the negative impact this could have on student recruitment, international esteem and providers' ability to attract philanthropic support, private investment etc. (See 18c below).

Further, a scheme of differentiation works only if, in each iteration, there is *always* a proportion of providers classed as 'bronze', a proportion classed as 'silver' and a proportion classed as 'gold'. It is therefore difficult to see how differentiation enables the TEF to improve quality of provision and/or to enhance esteem across the sector. A single kite-mark would be more appropriate.

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

a. For provider-level TEF?

No assessment, but the provision of information to enable students to evaluate the institutions to which they wish to apply.

b. For subject-level TEF?

No assessment, but the provision of information to enable students to evaluate the subject for which they wish to apply.

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.

18c Cambridge was ranked 'gold' in TEF2. We have seen no obvious impact of this rating on international recruitment.

We have significant concerns about the recent misleading coverage of Cambridge's initial hypothesis for TEF4 as 'silver', which stems from the fact our NSS data is unreportable, owing to the student boycott of the NSS.

We are also concerned by the impact of 'bronze' and 'silver' ratings on international perceptions of UK higher education. Prospective international students currently consider UK higher education generally to be 'gold standard', and indeed UK higher education teaching performs strongly against international benchmarks. This performance is not reflected by the labelling of groups of providers as 'bronze' and 'silver' (particularly where benchmarking has obscured absolute quality). We are concerned that these ratings could over time prove detrimental to international recruitment to UK institutions generally, as well as to individual providers.

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

Our experience is that the TEF has not had this impact. Over the last three to four years, the Collegiate University has invested considerable resources in enhancing the educational experience of students, including mental health and wellbeing support. This commitment to enhancing the student experience has been driven by factors outside of the TEF, in particular student-Collegiate University engagement; it has not been motivated by the TEF in any way.

We would also emphasise that important sector-wide initiatives, including recent work on harassment, sexual misconduct and mental health and wellbeing, as well as outreach work with

schools to raise pupil aspirations, are best served by collaboration between institutions. These efforts in partnership are potentially put at risk by an overly competitive and market-driven environment.

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

There has potentially been some negative impact insofar as opposition to the TEF by our students' union and the consequent boycott of the NSS has significantly reduced the value of the survey in supporting enhancement at Cambridge. These survey returns have previously been very helpful to our work to enhance teaching and learning, and have also been significant in our quality assurance. If TEF can be re-established as never being linked to tuition fees or to assessment of institutions against each other, students might be more likely to re-engage with the NSS.

As the TEF does not consider all elements of the educational experience at Collegiate Cambridge, some areas (such as extra-curricular opportunities and mental health and wellbeing) are not part of the TEF process. Our students' unions have told us that the TEF risks diverting attention away from these important components of the student/educational experience.

We participated in the first subject-level TEF pilot and have significant concerns about the potential impact of implementation of this exercise on academic and administrative staff. Although we have managed to limit the administrative burden of TEF on academics, subject-level TEF will inevitably draw valuable resource away from teaching into administration.

We have concerns that subject-level TEF carries the risk of creating a set of "gold" or "bronze" subjects across providers which may lead students to make misjudged or uninformed decisions about subject choices which is contrary to the aims of TEF.

21. Has the introduction of TEF impacted positively on research and/or knowledge transfer? If yes, how?

We have no evidence to suggest that the TEF has had any positive impact on research and/or knowledge transfer.

22. Has the introduction of TEF impacted negatively on research and/or knowledge transfer? If yes, how?

We have no evidence to suggest the TEF has so far impacted negatively on research and/or knowledge transfer, although we have concerns at the potential impact of subject-level TEF on academic staff, in particular if there is a conflict in the timing of TEF and REF.

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

From the Collegiate University's perspective, the TEF has not helped us in any way to better understand students' needs or to tailor our provision accordingly. Nor has the TEF been a driver of our efforts to engage with our students and to enhance the educational experience at Collegiate Cambridge.

Following our participation in the subject-level pilot, we have significant reservations about subject-level TEF. It seems a very burdensome exercise for which we struggle to see any benefits. Subject-level TEF also risks ignoring the wider educational experience which institutions provide.

CUSU has provided the following statement:

From the perspective of the students' union, TEF has not been at all helpful. We have found that the information prospective students want is not provided by the blunt instrument of TEF, and that the level of awareness of TEF and understanding of the basis for the TEF ratings among current and prospective students are low. We have also not found TEF helpful in our work on educational provision at Cambridge, and we see a risk that its narrow definition of teaching quality will distract attention from educational issues that students care about beyond those considered by TEF, including pastoral support.

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

- a. Provider-level TEF?**
- b. Subject-level TEF?**

a), b) There is a considerable administrative burden attached to provider-level TEF. This burden increases yet further at subject-level TEF, where additional demands will be placed on academic staff who are also engaged in the REF (possibly simultaneously depending on the timing of REF and TEF assessment cycles).

It is worth noting that our experience of the subject-level pilot showed that the subject-level assessment took more time to prepare (60 pages for the total pilot, consisting of nine subject-level submissions and one provider-level submission, compared to 15 pages for the TEF 2 provider submission). The demand on departmental staff was greater, as they had to dedicate time to input into and review their subject submissions.

We also foresee an increase in time commitment and costs stemming from the adoption of the Model A process and metrics for subject-level TEF, including the costs of investing in systems and processes for information and evidence collection for subject-level submissions. The provider-level submission would also need to be fully re-drafted for subject-level TEF. In

consequence, we expect both a substantially longer lead-in time for the real exercise and a much greater involvement of senior staff, with impacts on overall costs for both factors.

Related to these resource implications and the dedication of staff time, we are concerned that provider-level and subject-level TEF exercises will distract attention away from the broader student educational experience.

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

- a. Provider-level TEF?**
- b. Subject-level TEF?**

We have identified no benefits from either provider-level or subject-level TEF.

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?

The design of the TEF and reliance on student outcomes data (narrowly measured through Graduate Outcomes data) present a significant risk of conflicting with providers' widening participation ambitions. For example, measures based on salary data create perverse incentives for providers to recruit the students most likely to go on to earn high salaries shortly after graduation. This may include students from parts of the UK under-represented in higher education who return 'home' following graduation, working for lower salaries than might be on offer in London and the South-East. At a minimum, the design of the TEF should not produce incentives that work against the widening participation expectations agreed by a provider in its Access and Participation Plan.

It has been stated that consideration is being given to how the TEF could be expanded to include taught postgraduate provision. Expansion into this area would necessarily require a different set of metrics. The risk posed by the TEF to the international reputation of individual providers, and indeed to the UK HE sector more generally, is even greater at postgraduate level given the numbers of international students recruited.

Our Graduate Union has expressed concern that the TEF is not explained as a system for assessing teaching quality at undergraduate level only (for example, the Office for Students website does not make this clear); this could be misleading for prospective postgraduate students who may otherwise interpret institutions' TEF rankings as indicators of quality across levels of provision.

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?

We have seen no advantage to students or impact on provision. Certainly some providers appear to do well in the TEF through benchmarking, even though their raw metrics do not indicate an exceptional educational experience.