

# Consultation Response: Subject level TEF

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[DfE consultation link](#)

[PDF consultation document](#)

[Technical specification document](#)

This response was led by the BU Policy team (see end of document for contact details).

## SUBJECT CLASSIFICATION SYSTEM

**Q1: 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?**

**No - disagree**

CAH2 does not reflect the way that subject grouping are organised at BU (or at any institution) and so there are difficulties with aggregating data and describing outcomes and learning opportunities across departments and faculties. For that reason we believe that a longer list of subjects is better than a shorter one, although this then raises issues with small data sets and reportable metrics. We strongly believe that to improve organisational alignment between REF and TEF, reduce administration and ensure a focus on the educational impact of research, the REF and TEF categories should be aligned.

**(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?**

**Yes**

See our response to questions 1 and 4. For example history and archaeology are taught in very different ways.

We strongly oppose the use of 7 subject groupings for the submissions. These groups are very broad:

- so broad that it is hard to see what value they would add for students, employers or universities themselves.
- The awards would be meaningless because they would be based on an assessment of teaching across a range of programmes which are taught in very different ways, using very different resources within the university, and with a very different student experience and outcome.
- the work involved in preparing the submissions would be as complex as for the institutional submission in Year 2, only multiplied by 7

We query whether it is helpful to have a subject level TEF process for those subjects which are regulated and subject to very high levels of scrutiny through the professional accreditation process. We do not believe that a TEF rating will necessarily add value for a student or an employer in these cases. See our response to question 11.

**Q2: Do you agree that we should have a longer duration and re-application period in subject-level TEF?**

**Strongly agree**

We believe that the overlapping cycles will cause a significant practical problem for the OfS and potentially for institutions. In practice universities who are hoping to improve their ratings will reapply as soon as possible. That will create a burden for the whole sector, who will at least need to check their data that is used for benchmarking purposes. But more importantly, it will create an uneven playing field. Those with gold awards will leave it as long as possible. Applicants will be comparing awards made this year – based on the latest data – with those made 2 or 3 years ago. This undermines the credibility of the awards. It is also not at all

clear what will happen when new subjects are introduced at a university part way through a cycle. Will there be no rating until the university re-enters for all its subjects?

We have raised this issue in responses to the Department on subject level TEF in the past - before TEF was mandatory. Now that it is mandatory we believe that this is even more important.

The only way to make the system credible is for all awards to be assessed at the same time (like the REF). It should not be for institutions to select the year that they re-enter and all institutions should be assessed in the same year. To allow for the system to reflect improvements in performance we would therefore propose a three year cycle, with a fixed three year duration.

Exceptions would be needed for institutions or subjects if the data does not allow a three year award and would need an annual process, but this should not drive the whole system.

**Q3: 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)?**

**No – strongly disagree**

We strongly support the continued use of the 10 TEF criteria, benchmarking, submissions, an independent panel assessment process.

In terms of the ratings themselves, despite assurances that Bronze would be represented as positive this is not the impression created when the outcomes were announced. We are very concerned that the Gold/Silver/Bronze ratings are now associated with good/fair/poor in the minds of the public and the international community. When the Minister announced this consultation this impression was repeated:

“ Universities Minister Sam Gyimah said: Prospective students deserve to know which courses deliver great teaching and great outcomes – and which ones are lagging behind. In the age of the student, universities will no longer be able to hide if their teaching quality is not up to the world-class standard that we expect.” (<https://www.gov.uk/government/news/universities-to-be-rated-by-subject-quality>)

We have previously proposed that there should only be two levels – excellent and good. The third category would be “did not qualify” – i.e. those who are not eligible because they have failed to achieve quality standards. We suggest that this should now be reconsidered. It could be supported by a system of specific commendations for particular aspects of excellence, as was proposed in the original green paper.

It will be important to ensure that subject level ratings are not the same as provider awards as this will be confusing for applicants. Alongside excellent/good awards for an institution, we would therefore propose that subjects should be rated with one or two stars. An applicant looking at a subject would thus be able to compare effectively, e.g. Excellent\* with Good\*\*, requires less explanation than Gold/Bronze or Bronze/Gold.

**Q4: 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)?**

*Please explain your answer. When answering this question, please consider the underlying principles that define Model A (a ‘by exception’ approach) versus model B (a ‘bottom up’ approach), and which principle you think we should adopt for subject-level TEF. While we are also interested in detailed comments on the specific design of each model, the final design will likely be a refined version of those presented in the consultation document. This question is therefore seeking views about which underlying approach you prefer. In your response, you may wish to consider the evaluation criteria set out in the specification for the first year of pilots (see below).*

**An alternative approach**

We have serious concerns about both models.

In Model A, the process would mean that, for a provider initially assessed as Bronze, written submissions would be required for its higher performing subjects – leaving no opportunity to address the majority which have driven the bronze rating. This would mean that Model A would be likely to give those providers with an

initial hypothesis of gold a significant advantage in the process over those with either silver and bronze ratings. Model A is misleading for applicants who will be seeking to compare programmes across institutions when some awards have been made on the basis of a full assessment and some on the basis of an institutional level submission and data taken from a range of programmes. We do not believe that this is acceptable. Model A is a “metrics driven” approach in which the metrics define the process and the process then limits the outcomes of the assessment. We believe that the TEF should be informed but not driven by the metrics. A bottom up approach is therefore more acceptable.

We strongly oppose Model B because of the use of 7 subject groupings for the submissions. These groups are very broad:

- so broad in fact that it is hard to see what value they would add for students, employers or universities themselves. It should be possible for students to look at the submission and make sense of it without having to enter into a philosophical debate about whether the subject is a science or a social science and not be able to resolve it without looking it up.
- The awards would be meaningless because they would be based on an assessment of teaching across a range of programmes which are taught in very different ways, using very different resources within the university, and with a very different student experience and outcome.
- the work involved in preparing the submissions would be as complex as for the institutional submission in Year 2, only multiplied by 7

We would therefore support a different model in which every subject (i.e. 35 or more as highlighted above) would be assessed separately, with its own submission. An institutional submission would still be required for institutional level matters (TQ2 and SO3). We believe that LE1 should be addressed both at an institutional level and a subject level because of the difference in resources across disciplines – institutions should be able to describe discipline specific resources in a subject level submission where this is appropriate.

**Q5: 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?**

**(a) No – strongly disagree**

As we have noted above, in Model A, the process would mean that, for a provider initially assessed as Bronze, written submissions would be required for its higher performing subjects – leaving no opportunity to address the majority which have driven the bronze rating. This would mean that Model A would be likely to give those providers with an initial hypothesis of gold a significant advantage in the process over those with either silver and bronze ratings. Model A is misleading for applicants who will be seeking to compare programmes across institutions when some awards have been made on the basis of a full assessment and some on the basis of an institutional level submission and data taken from a range of programmes. We do not believe that this is acceptable.

**(b) Strongly agree**

If model A is adopted (and we have said that we strongly oppose it) then this must be part of the process in order to ensure that it is possible for providers to highlight areas of excellence which are not evident from the metrics

**Q6: In Model A, should the subject ratings influence the provider rating?**

**Yes, agree**

We do not support Model A. However, we believe that this feedback loop would be important. As has been discussed at length during the development of the TEF, there are limitations with the metrics and the provider submission allows important context and the inclusion of information which addresses those criteria not addressed by the metrics. If the provider submission process changes the initial hypothesis for the subject ratings, this is absolutely relevant to the institutional rating and should be taken into account. This will only

work, however, in a framework in which all subjects and an institutional level assessment are done at the same time.

**Q7: In Model B, do you agree with the method for how the subject ratings inform the provider-level rating?**

**Yes, agree**

Although we have said that we do not support this model, if a “bottom up” model is used, and provided that the submissions are made at a subject level (not in 7 groups) we believe that this would be the best way to arrive at the institutional award.

**Q8: Do you agree that grade inflation should only apply in the provider-level metrics?**

*If you are able, please provide information about how grade boundaries are set within institutions to inform whether our rationale applies consistently across the sector. Comments on the potential impacts of applying grade inflation only at provider-level are also welcome.*

**Neither agree nor disagree**

We do not support the grade inflation metric. Improvement in student outcomes is one of the objectives of the TEF and this undermines that. It also specifically disadvantages those universities who are improving against the TEF criteria, and therefore improving outcomes, as against those who have already achieved gold awards – this is unfair and unhelpful to the sector as a whole.

**Q9: What are your views on how we are approaching potential differences in the distribution of subject ratings?**

*You may wish to comment on our approach to very high and low absolute values, clustered metrics and regulation by Professional, Statutory and Regulatory Bodies (PSRBs).*

We support taking a natural approach to distribution.

As noted above, we question whether it is necessary to have a TEF process and rating where there is substantial regulation and a professional body accreditation that involves a high degree of oversight.

**Q10: 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)?

**(a) No – strongly disagree**

No TEF rating is not a helpful outcome (it suggests failure). We suggest that a provisional rating should be given if there is no data at all.

If there are at least one data source then the full process could be followed with an additional section to the written submission to address the areas for which there are no metrics. This would be consistent with our argument that the TEF should be metrics informed rather than metrics driven.

**(b) Follow an alternative approach**

If there are at least one data source then the full process could be followed with an additional section to the written submission to address the areas for which there are no metrics. This would be consistent with our argument that the TEF should be metrics informed rather than metrics driven.

**Q11: Do you:**

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

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

**(a) No, disagree**

We agree that it may not be appropriate to have mandatory declarations for all subjects. We propose a separate consultation on this issue looking at the subjects in detail and inviting responses from the

professional bodies. As we have noted in our response to question 1, we believe that in some cases the regulatory and accreditation structure means that there is no need for a TEF process for that subject at all, and this could be informed by such a consultation process.

**(b) Yes.**

We support mandatory declaration for certain highly regulated subjects potentially leading to professional qualifications, e.g. medicine, dentistry and veterinary science, nursing, midwifery and similar subjects, law, accounting, teaching, architecture, engineering. This should be the case even where the CAH2 category includes some programmes which are not similarly regulated – i.e. the declaration can be specified for the next level of the hierarchy within the CAH2 grouping.

**Q12: Do you agree with our approach to capturing interdisciplinary provision (in particular, joint and multi-subject combined courses)? Please explain your answer. We want to ensure that providers are not discouraged from taking an interdisciplinary approach as an unintended consequence of subject-level TEF. We therefore welcome feedback on how the proposed approach will impact on providers and students**

**No – disagree**

We believe that subjects should be reported in all relevant areas, we do not understand the why this would work for two subjects and not for three or four.

**Q13: 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?**

**No – strongly disagree**

We do not support this, in particular as a practical issue we note that there are likely to be changes to the data that is included in this metric within the academic year and so it will always be out of date and therefore misleading. This issue is better addressed by existing requirements to publish up to date information about contact and address significant changes through the student information requirements as supported by the CMA guidance

We believe that this metric, in attempting to compare things which are not comparable, will be misleading, confusing and unhelpful to students. The quality and intensity of contact and learning opportunities cannot, in our view, be helpfully reduced to single indicator. Unintended consequences are likely to include a chilling impact on innovative approaches to learning which could have an impact on the metrics.

**Q14: 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?**

See above, we do not support this

**Q15: 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.**

*If you have an alternative suggestion, you may wish to consider the following factors:*

*Meaningful for students – the ability of the measure/method to provide meaningful information for students.*

*Value for money – proportionality of the cost of a measure.*

*Generalisability across the sector – how a measure can be applied and work across the sector.*

*Accuracy/validity of measures – how accurately data can be collected and verified.*

*Supporting diversity of provision – the capability of the models to recognise diverse and innovative forms of excellence.*

See above, we do not support this As noted above, this information will be very variable and will be out of date within year almost as soon as it is measured

**Q16: 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?**

We have serious concerns, as we have noted above, about the impact of the rhetoric around “needs improvement” from the government that has already taken hold, and are concerned about the more specific

impact on disciplines and programmes across the sector if this approach is repeated in subject level, which is why we believe a change to the bronze/silver/gold award is essential.

We do not believe that either of the models for subject level TEF is workable and we have serious concerns in addition to those raised above, about the workload and value for money of the subject level TEF process.

We suggest that further research needs to be done into the likely value of the additional data for applicants, by looking, for example, at the use made of the Unistats data which is already available. Bournemouth University's own evidence gathering shows that few students are aware of the Unistats tool or confirm that they have used it (when asked, typically less than a third of our open day visitors stated that they knew of the tool or made use of it). In addition, Bournemouth University web analytics data for the year ending 31 August 2015 showed that of the 670,000 sessions which involved a view of an Undergraduate course, just 1.7% (11,000) viewed the 'Course Information Stats' page which provides the supplementary information to the data presented in the Key Information Set (KIS) widget. When questioned about this and the lack of "click through" to Unistats using the KIS widget during the focus groups prospective students felt that the information that was available directly from the course pages on the Bournemouth University website was sufficient.

For further information on this consultation response contact the policy team (details below).

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