

## Response ID ANON-SEUV-HDE2-6

Submitted to **Teaching Excellence and Student Outcomes Framework: Subject-level**

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### Introduction

#### i What is your name?

**Name:**

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#### iii I am a:

Charity or social enterprise

**Please state:**

#### iv If applicable, what is your organisation's name?

**Organisation:**

Staff and Educational Development Association

#### v Would you like us to keep your responses confidential?

No

**Reason for confidentiality:**

### Subject classification system

#### 1 To define 'subjects' in subject-level TEF, do you:

Yes - agree

**If you answered No, what other systems could be used and why?:**

SEDA largely agrees with using level 2 of CAH2 as we feel that there should be consistency across the education sector. If these are the groupings being used by other agencies, then these should be part of the TEF too. We would like clarification on how CAH2 aligns with the JACS codes used in the NSS.

Yes

**If you answered Yes, please explain why.:**

We feel that the groups are rather oddly constructed e.g. Architecture in Social Sciences, so agree that institutions should be able to move a subject from one grouping to another, to reflect local variations. We would like clarification on how CAH2 aligns with the JACS codes used in the NSS.

SEDA would suggest the following changes:

- Architecture, building and planning move to Engineering and Technology or to Arts

### Duration of award

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

Yes - agree

**The focus of this question is on whether we should extend the duration. However, please provide as much detail as you can on your preferred length for the duration and/or re-application period.:**

SEDA broadly agrees with this; however, as most degree courses traditionally last for 3 years, it seems to make more sense to change the 'may reapply' to after 3 years i.e. after one complete U/G degree cycle. As many institutions have a quinquennial review, it may also be more logical to change the maximum duration of an award to 5 years.

We agree that an annual assessment process does not make sense; however, an institution that has not achieved a bronze, may wish to reapply the following year, if there have been substantive changes that may change the rating.

## Overview of subject-level TEF design

**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)?**

Yes - agree

**If you answered No, please explain why.:**

We would support retaining the same system to allow for comparison. We would like to reiterate that we still find the metrics flawed and that flawed, proxy metrics are unlikely to lead to a reliable outcome but understand that these are now in place and are unlikely to be changed.

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

Not Answered

**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).:**

SEDA prefers Model B. This model leads to greater clarity in terms of being able to differentiate between subjects, and between subject ratings and provider rating.

Model B gives a better foundation for, and confidence in, the overall rating. It is more thorough, equitable and fair and provides a truer judgement of all the parts.

SEDA has a concern, however, that with Model B, poor performance in a percentage of subjects will pull the whole institution's rating downwards to a bronze whereas headline institution figures and narrative could put the institution at silver. Preferences for Model A or B will, therefore, depend on different institutional contexts.

### Model A: Generating exceptions

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

Yes - agree

**If you answered No, please explain why. You may wish to comment on variations or options that we have not mentioned:**

Yes - agree

**Please explain your answer. You may wish to comment on options for identifying the number of additional subjects or on any variations or options that we have not mentioned.:**

### Model A: Relationship between provider and subject assessment

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

Yes - agree

**Please provide as much detail as you can on why and how this relationship should be brought about.:**

SEDA would support this but we are concerned that a significant number of exceptions could alter the provider rating. The documentation would need to stipulate exactly how many exceptions could result in a change – the percentage needs to be clear.

### Model B: Relationship between provider and subject assessment

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

Yes - agree

**You may wish to comment on the method for calculating the subject-based initial hypothesis, as well as how this is used in the assessment process. We also welcome alternative approaches that do not use the subject-based initial hypothesis.:**

This allows individual subjects the opportunity to showcase their excellent practices. It could also incentivise institutions to invest in teaching and learning, pedagogic CPD and ongoing staff development. We are concerned that, in some cases, this could lead to a culture of blame. This is already the case in some institutions, with academics working on programmes, which are performing less well being made redundant and programmes closing, rather than seeing this as an opportunity for development. SEDA would like to see TEF take a potential blame culture into account and consider how to minimise this.

The size of programme is an important factor here: it is easier for smaller programmes to perform. SEDA would like TEF to consider how to ensure fairness across different sizes of programmes.

## Metrics

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

Yes - agree

**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.:**

If grade inflation is included, we agree that it should be at provider level, but ideally SEDA would like this to be omitted.

If grade inflation does appear, we would like to have a clear definition of grade inflation and an explanation of how to prove that grade inflation is occurring rather than improved results being the result of enhanced teaching and student performance. Those assessing in higher education are now encouraged to use the full range of marks unlike in the past when people hardly graded above 70 and SEDA would like to see this continue. An emphasis on grade inflation could lead academics to avoid awarding grades at the higher end of the scale.

There are various confounding factors, such as a small sample sizes in certain subject areas leading to the appearance of grade inflation. A second confounding factor is that grades vary by discipline: it is more straightforward to award higher marks in more factual subjects than in arts and social sciences.

### 9 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):**

SEDA finds it very difficult to comment on this with any certainty. The results from the pilot are needed before a decision can be made. It is worth pointing out, however, that certain subjects are governed by professional bodies, i.e. the curriculum will be largely dictated by the professional body and there is little leeway. This will have to be taken into account.

### 10 To address the issue of non-reportable metrics:

No - disagree

**If you answered No, please explain why.:**

SEDA is concerned about whether this will disadvantage small courses, which may not be able to be part of the TEF. Will this have a negative effect on recruitment? This is particularly pertinent for institutions with a number of very small courses.

SEDA would also query whether this would also apply to international partners and therefore have an impact on metrics?

rely on group metrics alongside any reportable subject-level metrics?

**Please explain your answer.:**

It makes more sense to rely on group metrics alongside any reportable subject-level metrics, particularly if the provider level metrics are to be phased out in due course. One potential problem is that the group make-up will vary according to the institution.

## Additional Evidence

### 11 Do you:

Yes - agree

**If you answered No, please explain why.:**

This will allow for flexibility and to recognise the different foci of courses.

No

**Please outline which subjects should have mandatory declaration and why.:**

## Interdisciplinarity

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

Yes - agree

**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.:**

Agreed in terms of joint degrees. In terms of multi-subject combined degrees there will need to be a pilot to ensure that the approach adopted allows for transparency for students for all subjects included in the degree.

## Teaching Intensity

### 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?

No - strongly disagree

#### Please explain your answer.:

SEDA feels strongly that teaching intensity is not a measure of quality teaching. Additionally, certain courses require more teaching than others, e.g. medicine. One of the aims of HE is to develop autonomous, self-regulating learners. Too much teaching is not necessarily a good thing – there is an optimum level of input from academics and, from that point onwards a need for students to learn independently. Time is needed for the active processing of new knowledge and a packed curriculum does not allow for this.

Additionally, increased contact hours could be with poor teaching, which does not lead to high quality learning. The class size comes into play here: in smaller classes the learning is more intense. It is erroneous to conflate contact time with higher quality learning.

Teaching intensity should not be included in the TEF.

### 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?

#### Question 14:

This is very contextual, dependent on the subject area. How would clinical placements be measured in terms of contact hours? Field trips? Internships? Dissertation research? Is it contact with teachers or contact with learning (learning hours) that is being discussed here? SEDA would like clarity here. If contact hours are to be included, the same measures as those already used e.g. in KIS data should be used to avoid confusion.

The QAA has quite a broad / liberal view of contact time as at: <http://www.qaa.ac.uk/en/Publications/Documents/contact-hours.pdf> (see page 4 which also includes "Contact time may also take a virtual rather than face-to-face form, through the use of email, email discussion groups, virtual learning environments (VLEs) and other technology-aided means. It can also take place in a work-based setting....")

If contact is to be included, TEF should also adopt a broad view of the nature of contact time and encourage HE Providers to do so. This will place value on all learning opportunities provided.

### 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.

#### Question 15:

Following on from Q14, could there be, perhaps, a minimum contact hours level for degrees. This would, of course, vary by subject, but could act as a benchmark. Again, the question of what constitutes contact hours is raised. What is the role of technicians, librarians and other professional services? They are central to many students' learning, but the time they spend with students is not always 'counted' in contact hours. SEDA does not agree with the use of 'seniority' as a measure of teaching quality. High quality learning can be facilitated by very junior members of staff.

The suggestion of contact with learning materials as a measure is problematic – can this actually be measured? Trips to the library or logging into the VLE are very unreliable measures as they do not necessarily link to learning. Again, SEDA would like clarity.

One real measure of success is independence of the learner. This is not about intensity of teaching but about good curriculum design. The TEF should focus more on quality not intensity of teaching.

## Other comments

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

#### Question 16:

SEDA would like to see how institutions encourage staff to engage in development in terms of their teaching and support of learning and how, having gained an initial qualification, they remain in good standing. The support afforded to academics and others engaged in teaching and supporting learning should be taken into account, as this highlights an institution's real commitment to high quality teaching and learning.

It is important to recognise that a lot of work has already been undertaken in this area starting with SEDA teacher accreditation (1992), but also the UKPSF and other developmental frameworks. Currently this work is not recognised in the TEF. It can be included in the narrative statement, but SEDA would like to see this positioned more centrally. Measures could include the recognition of teaching and other qualifications and the recognition of time spent on staff development.

It is important to recognise that being an expert in a field does not necessarily equate to good teaching. For the REF it is acknowledged that institutions buy in expertise. TEF is different: it is about developing institutional capacity – how much institutional investment is there in developing home-grown teaching and learning capacity? The use of precarious staff is a factor and institutions that rely heavily on GTAs and visiting lecturers find it more difficult to ensure quality of teaching than those that invest fully in their 'home' talent. It would be a further indication of an institution's commitment or the commitment of a subject area in an institution to high quality teaching to look at these elements.

A final word would be to align, where possible, with tried and tested methods, metrics and standards so that all those involved have a real opportunity to apply the

same interpretations to data.