



Teaching Excellence Framework Technical Consultation – Response Form

Name/Organisation: University and College Union (UCU)

Please tick the box that best describes you as a respondent to this consultation:

	Respondent type
<input type="checkbox"/>	Alternative higher education provider (with designated courses)
<input type="checkbox"/>	Alternative higher education provider (no designated courses)
<input type="checkbox"/>	Awarding organisation
<input type="checkbox"/>	Business/Employer
<input type="checkbox"/>	Central government
<input type="checkbox"/>	Charity or social enterprise
<input type="checkbox"/>	Further Education College
<input type="checkbox"/>	Higher Education Institution
<input type="checkbox"/>	Individual (Please describe any particular relevant interest; parent, student, teaching staff etc.)
<input type="checkbox"/>	Legal representative
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Professional Body
<input type="checkbox"/>	Representative Body
<input type="checkbox"/>	Research Council
<input type="checkbox"/>	Student
<input checked="" type="checkbox"/>	Trade Union or staff association
<input type="checkbox"/>	Other (please describe)

Question 1 (Chapter 1)

Do you agree with the criteria proposed in Figure 4?

Yes No Not sure

Please outline your reasons and suggest any alternatives or additions.

The University and College Union (UCU) is the largest trade union and professional association for academics, lecturers, trainers, researchers and academic-related staff working in higher and further education throughout the UK.

As outlined in our response to the Green Paper, we have fundamental concerns about the proposals to introduce a Teaching Excellence Framework (TEF). We remain deeply concerned by any proposed link between quality as defined in the TEF and additional fee income, and will oppose any move to further increase the lifetime cost of higher education, which already sits at over £50,000 for the poorest undergraduates.

Everyone recognises the need to support high-quality teaching, but it is hard to see how many of the measures which have been proposed for the TEF will either measure quality or improve it. In particular, we remain concerned about the use of flawed, proxy metrics as indicators of 'teaching quality' and the increased bureaucracy and game playing that will result in the implementation of the TEF. We also believe that the introduction of the TEF will significantly undermine the linkages between teaching, scholarship and research embedded within higher education.

For these reasons we call for BIS to withdraw the current proposals and work with the sector in coming up with alternative plans that genuinely recognise and support teaching quality.

In terms of specific comments on the assessment criteria as outlined in figure 4, we welcome the explicit reference to the importance of an institutional culture that recognises and rewards excellent teaching. We expand on this in response to question 8. Ultimately, excellent teaching and learning, and a high quality student experience, however, are dependent on the staff who actually deliver teaching and learning and who provide other support to students. We believe that if the higher education sector is serious about supporting and valuing high-quality teaching, then staff must be at the centre of that process and governments and universities must address underlying issues such as casualisation, workloads and career progression.

Question 2 (Chapter 3)

A) How should we include a highly skilled employment metric as part of the TEF?

As mentioned above, UCU remains very concerned about the use of metrics, including a highly skilled employment metric, as part of the TEF. This is because graduate employment outcomes are heavily shaped by external factors such as social class, gender, ethnicity, geographical location, subject choice and institutional reputation, rather than simply on the basis of 'teaching quality'.

B) If included as a core metric, should we adopt employment in Standard Occupational Classification (SOC) groups 1-3 as a measure of graduates entering highly skilled jobs?

Yes No Not sure

We reiterate our overall concerns about the use of a skilled employment metric. In addition, SOC groups 1-3 may not capture all the jobs that require degree level knowledge and skills (for example, veterinary nursing and finance administration would fall outside this measure).

C) Do you agree with our proposal to include all graduates in the calculation of the employment/destination metrics?

Yes No Not sure

Please outline your reasons and suggest any alternatives.

We are concerned about the detrimental effect that this policy will have on equality and diversity in the sector. In particular we fear that it may discourage universities from recruiting students from particular backgrounds, for example, students with disabilities and students with caring responsibilities, who may not score as well on the highly skilled employment metric.

If the government remains committed to including a highly skilled employment metric in the TEF, then we call on BIS to undertake a proper equality impact assessment.

Question 3 (Chapter 3)

A) Do you agree with the proposed approach for setting benchmarks?

Yes No Not sure

In our response to the Green Paper we expressed major fears that the metrics on retention rates and employability data in the TEF may end up disadvantaging universities that already focus on widening participation and part-time, mature provision. We are pleased to see that the government has listened to these concerns and is proposing to benchmark TEF criteria. However, we would appreciate further information as to why certain factors have been excluded from the benchmarking process, for example, ethnicity, sex and disability from the non-continuation data. We would also welcome clarification about whether the benchmarking process will be able to assess the impact of 'intersectionality' on institutional outcomes such as retention rates and graduate employment.

On a separate issue, we are disappointed that there will be no requirement for all providers to have an Access Agreement in place as a condition of entry into the TEF. We are concerned that the alternative proposals outlined in paragraph 44 (i.e. the possibility of a provider "submitting a statement capturing its activity in this area") are far too weak.

B) Do you agree with the proposed approach for flagging significant differences between indicator and benchmark (where differences exceed 2 standard deviations and 2 percentage points)?

Yes No Not sure

Please outline your reasons if you disagree.

Our membership does not have a strong view on this issue.

Question 4 (Chapter 3)

Do you agree that TEF metrics should be averaged over the most recent three years of available data?

Yes No Not sure

Please outline your reasons and suggest alternatives.

Our membership does not have a strong view on this issue.

Question 5 (Chapter 3)

Do you agree the metrics should be split by the characteristics proposed above?

Yes No Not sure

Please outline your reasons and suggest alternatives.

We agree with the choice of 'splits' in paragraph 88.

While these 'splits' are appropriate for institutional level assessments, it may be necessary to review them if a decision is made to move towards subject-level assessments. This is because it may be difficult to ensure large enough cohorts to produce sufficiently robust data.

Question 6 (Chapter 3)

Do you agree with the contextual information that will be used to support TEF assessments proposed above?

Yes No Not sure

Please outline your reasons and suggest any alternatives or additions.

We agree with the current list of contextual information but recommend that BIS looks into the possibility of using additional data sources. For example, in UCU's response to the Green Paper, we highlighted the importance of geographical mobility and travel to study patterns, as this can relate particularly to the needs of mature and working class students. Hence, it may be useful for institutions to provide contextual

information on the proportion of enrolments from the local area and/or information on the proportion of students living at home.

Question 7 (Chapter 3)

A) Do you agree with the proposed approach for the provider submission?

Yes No Not sure

As outlined in response to question 1, we have major problems with the overall approach adopted in relation to the TEF. While we are sensitive to the need to minimise the burden on institutions, we cannot see how the TEF (i.e. an institutional, metrics-based assessment linked to tuition fees) will offer a genuine assessment of the quality of teaching and learning in higher education. In fact, rather than an academic-led initiative designed to encourage greater recognition of teaching, the primary function of the TEF appears to be the further marketisation of the higher education sector.

In paragraphs 109-110, we are disappointed that there is only a weak commitment towards engaging with student representatives, in particular student unions.

B) Do you agree with the proposed 15 page limit?

Yes No Not sure

Please explain your reasons and outline any alternative suggestions.

We do not have a strong view on the length of the provider statement, although demonstrating the 'impact and effectiveness of teaching' across an entire institution within 15 pages will be a difficult task. And despite the 15 page limit, increased administrative burden on institutions is an inevitable consequence of the high-stakes assessment proposals envisaged in the TEF technical consultation. As has happened with the REF, it will lead institutions to invest heavily in preparing for the TEF, e.g. increased administrative burden on staff, the creation of new TEF-specific roles etc. Once again this will distract from the core activity of teaching and research.

Question 8 (Chapter 3)

Without the list becoming exhaustive or prescriptive, we are keen to ensure that the examples of additional evidence included in Figure 6 reflect a diversity of approaches to delivery. Do you agree with the examples?

Yes No Not sure

Please outline your reasons and suggest any additions or alternatives?

As mentioned in response to question 1, we are keen to ensure that the TEF supports an institutional culture that recognises and rewards excellent teaching. But this cultural shift will require institutions to address core staffing issues such as job insecurity, heavy workloads and inadequate career progression for teaching-

focussed staff. We remain sceptical about the capacity of the TEF to deliver on these key staffing-related issues, particularly in relation to workloads.

At the same time, we support the proposal in figure 6 for panel guidance to include the “level of experience and *contractual status* of staff involved in teaching”. In addition, we look forward to working with HEFCE in their plans to investigate a possible metric on the contractual status of staff.

In terms of recognition, promotion and progression opportunities, we call for the TEF panel to look at the *implementation* of criteria on ‘rewarding excellence in teaching’. This will require detailed evidence such as on the numbers of teaching-focussed staff who have been promoted and on the proportion of professors who have achieved this status on the basis of their excellent teaching.

At the same time, we are concerned about the undue emphasis placed on ‘employer engagement’ and ‘enterprise and entrepreneurship’ in figure 6. We call for a broader notion of student outcomes to include ‘societal or civic engagement’.

Question 9 (Chapter 4)

A) Do you think the TEF should issue commendations?

Yes No Not sure

B) If so, do you agree with the areas identified above?

Yes No Not sure

Please indicate if you have any additional or alternative suggestions for areas that might be covered by commendations.

We do not have a strong view on this issue, though we are slightly concerned that BIS has already attempted to pre-judge the view of the TEF panel in assuming that only 5-10% of providers would be likely to receive a commendation in any given area.

As in our response to question 8, we suggest broadening out the example of ‘excellence in business engagement’ to include ‘societal or civic engagement’.

Question 10 (Chapter 4)

Do you agree with the assessment process proposed?

Yes No Not sure

Please outline your reasons and any alternative suggestions. The proposed process is set within a relatively tight timescale, reflected in the key dates included in Annex B. Responses should be framed within this context.

We would like to reiterate our concerns about the short timetable proposed for the implementation of the TEF. This has led to fears that the TEF panel will be forced to

rely too heavily on quantitative metrics as the main basis of the assessment. At the same time, we have major concerns about the capacity of the panels to make valid distinctions between the various provider statements.

Question 11 (Chapter 4)

Do you agree that in the case of providers with less than three years of core metrics, the duration of the award should reflect the number of years of core metrics available?

Yes No Not sure

Please outline your reasons.

We support the proposal to limit the duration of a TEF award for new providers who are unable to provide three years of core metrics.

Question 12 (Chapter 5)

Do you agree with the descriptions of the different TEF ratings proposed in Figure 9?

Yes No Not sure

Please outline your reasons and any alternative suggestions.

As outlined in our response to the Green Paper, we have problems with the introduction of a competitive rating system for 'teaching excellence'. One of the drawbacks with such a system is that it can lead to significant 'gaming' by institutions, who instead of preparing for the TEF would be better off focusing directly on enhancing student learning.

In terms of the specific proposals in the technical consultation, we believe that the ratings of 'excellent' and 'outstanding' are problematic as they are too similar in terms of their meaning. It also seems odd that 'excellent' will not be the highest rating in a Teaching Excellence Framework. In the interests of greater clarity, we propose using 'Meet Expectations', 'Good [or 'Above Expectations']' and 'Excellent' as alternative categories.

Thank you for taking the time to let us have your views.

We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would you be happy for us to contact you again from time to time either for research or to send through consultation documents?

Yes

No

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