

21 May 2018

TEF Team
Ground floor
Sanctuary Buildings
Great Smith Street
London
SW1P 3BT

Dear Ms Thomas

Re: Teaching Excellence and Student Outcomes Framework: subject-level

The British Pharmacological Society, Pharmacy Schools Council and British Toxicology Society welcome the consultation on the Subject-level Teaching Excellence and Student Outcomes Framework.

The British Pharmacological Society has submitted a detailed response in collaboration with the Royal Society of Biology. In addition, our organisations would like to draw your attention to some specific concerns we have about how Pharmacology is handled in the TEF. We note that Pharmacology is included in the group "Pharmacology, Toxicology and Pharmacy", as defined by the Common Aggregation Hierarchy (level 2). We recommend reconsideration of this grouping such that Pharmacy is handled separately from Pharmacology and Toxicology.

There are significant differences in course content, structure, financing and outcomes, meaning they are unsuitable to be assessed together:

- Pharmacy is a multi-biomedical disciplinary science-based academic course, but is vocational, with the training and science structured to provide an accredited qualification (regulated by the General Pharmaceutical Council¹) for registration as a Pharmacist. Pharmacists command a broad spectrum of roles in the research, design, development, optimisation and clinical delivery of medicines.
- Pharmacology represents the fulcrum linking multiple biomedical disciplines together including molecular biology, physiology, immunology, neuroscience and genetics. It is an academic (not vocational) degree that focuses on training students for working in an academic or industrial setting. Students trained in pharmacology may follow a wide range of career paths, including working in primary pharmacological research, carrying out drug screening and running clinical trials.

Pharmacy and Pharmacology courses are handled differently by the Quality Assurance Agency for Higher Education (QAA)². Pharmacy courses are described by their own QAA benchmark statements, whereas Pharmacology courses are compared to the biomedical sciences benchmarks. Therefore, we believe that Pharmacology is more suited to be included in the *Subjects allied to medicine* group. We believe that Toxicology is also better placed in this group for similar reasons, but are happy that it continues to be grouped with Pharmacology.

¹ <https://www.pharmacyregulation.org/>

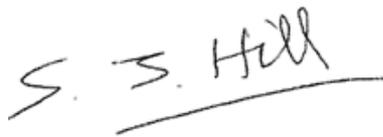
² <http://www.qaa.ac.uk/assuring-standards-and-quality/the-quality-code/subject-benchmark-statements>

As would be expected from such different courses, student outcomes, destinations, accountabilities and responsibilities after graduation are not comparable. These are key assessment criteria in the TEF, therefore this grouping could lead to skewing of ratings for the three courses. It is important that data collection reflects this reality so that students have access to accurate information about the outcomes they can expect. For this reason, the Society has previously called for Pharmacy and Pharmacology data to be treated separately (in the British Pharmacological Society's response³ to Sir William Wakeham's review of graduate employability in STEM⁴).

We hope that these insights will be valuable to the Department for Education in developing the subject-level Teaching Excellence Framework.

If you would like to discuss this in more detail, please contact Abigail Harris at the British Pharmacological Society (abigail.harris@bps.ac.uk / 020 7843 0493) or Andy Collier (andrew.collier@pharmacyschools.ac.uk / 020 7419 5492) who would be happy to coordinate an appropriate time and date.

Yours sincerely,



Stephen Hill
President, British
Pharmacological Society



Professor Nigel Ratcliffe
Chair, Pharmacy Schools
Council



Dr Chris Powell, FCRPath
President, British
Toxicology Society

³ <https://www.bps.ac.uk/getmedia/65c58ede-712e-4a62-a438-8af1c300ecfd/Wakeham-Review-Response-from-the-British-Pharmacological-Society.pdf.aspx>

⁴ Wakeham review of STEM degree provision and graduate employability. URL:
<https://www.gov.uk/government/publications/stem-degree-provision-and-graduate-employability-wakeham-review>