

British Pharmacological Society response to the Department for Education Call for Views on the Review of TEF

Submission deadline: 1 March 2019

About us

The British Pharmacological Society (BPS) is the primary UK learned society concerned with research into drugs and the way they work. The Society has around 4,000 members working in academia, industry, regulatory agencies and the health services, and many are medically qualified. The Society covers the whole spectrum of pharmacology, including laboratory, clinical, and toxicological aspects. Pharmacology is a key knowledge and skills base for developments in the pharmaceutical and biotech industries, and is therefore fundamental to a thriving UK industry and R&D. The Society publishes three scientific journals: the British Journal of Pharmacology, the British Journal of Clinical Pharmacology, and Pharmacology Research and Perspectives.

Introduction

The Secretary of State for Education has appointed Dame Shirley Pearce to carry out an independent review of the Teaching Excellence and Student Outcomes Framework (TEF). Shirley invites interested individuals and organisations to submit views and supporting evidence to inform her review.

Shirley is also commissioning other research, seeking expert opinion and drawing on other data and evidence to inform her review. She is interested in understanding the widest possible range of perspectives on the TEF through this 'call for views' exercise.

The Independent Review

Shirley's remit was set out in section 26 of the Higher Education and Research Act 2017. The terms of reference for the review reflect this remit:

1. The process by which ratings are determined under the scheme [for assessing quality in Higher Education] and the sources of statistical information used in that process;
2. Whether that process, and those sources of statistical information, are fit for use for the purpose of determining ratings under the scheme;
3. The names of the ratings under the scheme and whether those names are appropriate;
4. The impact of the scheme on the ability of higher education providers to which the scheme applies to carry out their functions (including in particular their functions relating to teaching and research);
5. An assessment of whether the scheme is in the public interest; and
6. Any other matters that the appointed person considers relevant.

For more detail, please see the full [TEF Independent Review terms of reference](#).

Respondents are strongly encouraged to provide details of the evidence and data that support their positions, to enable the Reviewer to understand the basis on which those conclusions have been reached. You can send attachments to the email address below.

When responding, **please do not exceed an average of 250 words per question.**

1. Why have TEF?

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 broad aims of the assessment of teaching quality are sound and provide a level of quality assurance that has been previously lacking. The aims should encourage HEIs to enhance teaching quality and provide a level of guidance about comparative strengths of different UK HEIs. However, the application of the assessment has not really delivered the above, with metrics unable to truly measure performance in a fair, consistent or transparent manner. In particular, the use of NSS performances across a significant portion of the measures seems less than ideal with such variability in uptake and response quality across the UK. We recognise that most of the available metrics have limitations, so perhaps relying less on an individual measure (e.g. NSS) and instead considering a broader combination might reduce the impact that individual weaknesses have.

The TEF should encourage and reward teaching excellence, but in truth, it overtly applies pressure, and stunts collaborative approaches by creating a more competitive and insular academic environment. Throughout the framework there is a lack of a reference or control point to validate and standardise comparative metrics.

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

11. 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

b. Please outline below the reasons for your answers

The TEF should both encourage and nurture teaching initiatives and developments to yield excellence, and provide key information for applicants about the relative strengths and weaknesses of HEIs across the UK in a clear, accessible way. In its current form, we are not confident that TEF achieves this due to limited confidence in the metrics used; the mismatch between the complexity of its operation and the overly simplified gold, silver or bronze award; and by creating a level of competition that might stifle collaboration.

Furthermore, the provision of information alone is unlikely to enhance provision. This would require resource and academic expertise, rather than a bureaucratic monitoring/evaluation process.

With regards to providing information to students, subject-level TEF is clearly more meaningful than provider-level TEF. However, a major weakness of TEF is that students choose undergraduate programmes rather than the "TEF subjects", which map very poorly onto degree programmes. For Pharmacology there is the additional issue, which

was addressed in the previous consultation¹, that Pharmacology is inappropriately grouped with Pharmacy rather than the related Biomedical Sciences. This problem goes deeper; for example, Medical Sciences and Neuroscience programmes have been grouped with some intercalated degrees but also with vocational courses such as Audiology, Cardiac Physiology, and Radiography and Radiography Diagnostics. A student applying to "Audiology" would therefore see a composite TEF rating for the whole group of programmes. Furthermore, some degree programmes have been split into two or more separate TEF subjects. We believe that this approach does not "better inform students' choices" and should be addressed.

12. Should there be any other purposes for TEF?

TEF should serve to develop and nurture teaching initiatives and quality. Currently, the TEF is a static way of measuring excellence, rather than recognising and encouraging new initiatives that will subsequently enhance provision and contribute to quality. The focus should be on catalysing development and recognising endeavour rather than simply measuring an end product. As such, recognition should be given for collaborative initiation and engagement.

Furthermore, HEIs, especially those outside of the Russell Group, currently view TEF as a marketing tool. This may be at the expense of academic rigour and innovation.

2. How well does TEF work?

Terms of Reference

1: The process by which ratings are determined under the scheme and the sources of statistical information used in that process

2: Whether that process, and those sources of statistical information, are fit for use for the purpose of determining ratings under the scheme

An independent expert view of the statistical information used in TEF will be commissioned separately, but we would also like your views on the following questions.

As referred to in the TEF overview (previous section), TEF is being delivered at both provider-level and subject-level. We are interested in views on both. Please make clear which level you are referring to in your answers to each question.

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 attempt to capture a broad range of measures relating to quality, environment and outcomes. However, we are not convinced that there is a shared understanding of their meaning, or of what 'good' looks like in each case. We also believe it is important to keep a long-term focus on the role of higher education, not just as a means of acquiring subject-specific knowledge and skills, but also as a way of developing wider skills and attributes. The criterion 'employability and transferable skills' attempts to capture this to some extent. Further, universities inspiring graduates to be motivated to serve society (for example by working in the voluntary sector) may be disadvantaged because the value of this work is not always reflected financially. Therefore, such universities might score poorly in TEF because students choosing to take up such work may be perceived to be the result of "poor" academic support, especially if

¹Royal Society of Biology. Royal Society of Biology draft response to the Teaching Excellence and Student Outcomes Framework: Subject-level Technical Consultation. https://www.rsb.org.uk/images/RSB_subject_specific_TEF_response_-_final_version.pdf (last accessed 11 February, 2019)

the salary is below median earnings.

It is also not apparent how the quality of the teaching content feeds into the TEF criteria. For example, how well do the relevant QAA Subject Benchmarks or undergraduate curricula inform course content? This is important to explicitly form part of the assessment and needs to be clarified.

Specifically, the 3 main and 11 sub criteria are sensible, but we disagree with their relative weighting. Teaching Quality occupies a huge component of the academic environment but has a combined weighting of 1.5, meanwhile, "continuation" (based on number of students dropping out in level 1) is weighted a 2.0. These weightings appear to apply more emphasis on retaining students than providing teaching quality. This is concerning as non-continuation can be affected by an array of variables outside of the control of the HEI. Teaching quality, however, is a truer measure of academic offering and student satisfaction, and thus should have a greater weighting applied to it.

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)?

No, the metrics are too narrow. Further, as stated in the 2018 RSB TEF consultation response²: "The timing of the NSS is unhelpful, as students may only appreciate the value of their course once they are in graduate employment". A further concern is that student evaluations are at serious risk of conscious and unconscious bias. For example, emerging research suggests that student evaluation of teaching disadvantages female teachers; this bias varies by discipline, student gender and other factors^{3,4}. If feedback is to be meaningful, from both the NSS and from students who participate in assessment panels, it is essential that there is appropriate support, training and guidance in unconscious bias.

In terms of measuring teaching quality, greater emphasis should be given to external reports such as examiner's reports and the supervision of final year students undertaking research projects should also be considered—student views are vital, but they are not necessarily a measurement of cross-institutional teaching quality.

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

Perhaps greater emphasis should be given to students' overall perception of the "value" of their degree and their university experience. For example, there could be an NSS that is given 5, even 10 years after graduation. This would address the fact that students might not recognise the utility of aspects of their degree until many years after graduation. With the benefit of hindsight, they could answer whether their degree was worth it/prepared them well. We recognise the difficulties in implementing this, but feel a mature reflection on the impact the degree has had at a chosen time down the line would be a very useful resource.

² Royal Society of Biology. Royal Society of Biology draft response to the Teaching Excellence and Student Outcomes Framework: Subject-level Technical Consultation. https://www.rsb.org.uk/images/RSB_subject_specific_TEF_response_-_final_version.pdf (last accessed 11 February, 2019)

³ Boring A. Gender Biases in Student Evaluations of Teachers Working Paper. <https://www.ofce.sciences-po.fr/pdf/dtravail/WP2015-13.pdf> (last accessed 12 February, 2019).

⁴ MacNeill L, Driscoll A, Hunt AN (2015). What's in a Name: Exposing Gender Bias in Student Ratings of Teaching. *Innovative Higher Education* 40: 291–303.

Other suggestions include measurement of learning gain in a more transparent manner, site visits and independent reports from those visiting, and student focus groups. This would provide a more personal and direct connection between the TEF process and the HEI, in which some first-hand experience influences the outcome.

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?

There may be issues for very large TEF subject groupings that statistically define/influence the benchmark to which they are then compared. There is also an issue with small TEF-subject cohorts (e.g. Pharmacology) because the metrics inevitably come out with no statistical significance and therefore offer little or no useful information about the HEI to interested students.

One question raised by benchmarking is the extent to which the process is understood by potential students and their parents—i.e, the "consumers" of the TEF. For example, how do we explain the possibility of two institutions having similar "raw" scores but potentially different TEF outcomes? And to what extent would they expect an indicator of "teaching quality" for example to differ depending upon where that teaching is taking place? Further thought on how benchmarking is perceived by the "consumers" of TEF is needed.

- b. Does TEF benchmark for the right factors?

A valid question to ask is whether the benchmarking process produces the appropriate outputs. In other words, are the flags produced by the metrics producing initial hypotheses that reflect what we would consider our best universities? Furthermore, we propose that benchmarking against geographical considerations may be of value. For example, the student experience at a campus-based university is very different to that in an inner city, especially London.

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?

While both are required, the quantitative metrics really need to be useful and accurate if they are to provide a reliable initial rating. The five-page narrative for subject-level TEF is difficult for large and diverse TEF-subject groups.

Overall, more qualitative evidence is needed to balance influence of poorly representative NSS data (e.g. from site visits, independent reports, and focus groups) and more objective quantitative measures such as learning gain (more transparent analysis of entry tariffs vs HEI performance) are needed to make the quantitative side more robust.

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

More details about the qualitative elements are needed.

The resource implications of subject-level TEF for universities are significant, both in terms of obtaining and maintaining the sources of data needed to evidence submissions

and the staff time involved in preparing these. Worryingly, such resources are being diverted from those used for teaching and education.

We will be separately investigating the needs of applicants and employers as well as the international impact of the scheme and the ratings, but we would also like your views on the following questions.

3. Are the ratings right?

Terms of Reference 3: The names of the ratings under the scheme and whether those names are appropriate

17. Are the purpose(s) of TEF met by:

- a. awarding a single rating? No
- b. with three levels of differentiation, plus a fourth rating for those unable to be assessed? No
- c. ratings named Gold, Silver, Bronze and Provisional? No

Please explain your answers.

These approaches oversimplify a complex collection of data. The ratings system (gold, silver and bronze) will be, and already is, used as a marketing tool by those HEIs with Gold especially. This system has the potential to encourage applicants to think superficially about where to apply. It may also make current students and recent graduates feel less than proud of their degree (if their HEI was ranked lower than Gold for example). Employers might feel similarly, leading to a cycle of lower employment metrics, leading to lower TEF.

However, at the same time, TEF must avoid overly complicating the stratification process, which will only serve to make the TEF findings complex and less accessible to the students who will rely on them for key choices.

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

- a. For provider-level TEF?

If rating is to remain, different elements could be rated rather than having a single "combined" rating. For example, a university might be gold for resources but bronze for teaching quality. This would allow potential students to be able to decide between, for example excellent facilities and poor teaching or excellent teaching and poor facilities.

- b. For subject-level TEF?

We do not yet have true subject level. As already noted, we do not believe that it makes sense to link Pharmacy with Pharmacology, and request that the subject level criteria be re-evaluated to separate these and other inappropriate groupings.

- 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.

No quantitative evidence of 'c' but as mentioned, HEIs are using gold rankings for marketing. Likewise, it is almost certain that this will impact university reputations, especially outside of the Russell Group.

4. Has TEF changed anything?

Terms of Reference 4: The impact of the scheme on the ability of higher education providers to which the scheme applies to carry out their functions (including in particular their functions relating to teaching and research)

The review will consider the recently published [Evaluation of Provider-level TEF 2016-17 \(Year 2\)](#) as well as other available evidence, but we are also interested in your thoughts.

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

If yes, how?

Yes in that HEIs are reflecting on teaching quality and student experience more. It is also positive that teachers are being recognised as being important, although still not to the level of researchers, who traditionally are viewed in higher esteem by HEIs. TEF could go some way to addressing this historical and inaccurate view.

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

If yes, how?

Yes, TEF is drawing much needed resources away from teaching. There is an associated danger of a whole "industry" developing around TEF submission and strategic maximisation of metric outcomes. Further, TEF amplifies the educator's conflict of interest initially produced by the NSS (i.e. to give students what they like versus what they may not like or see the benefit of immediately, but that they need). TEF also ignores the broader, life-development aspects of university (e.g. engagement with societies, clubs, co-curricular, extra-curricular activities, development of transferable life skills). Also, we question whether economic (e.g. shareholder interests) and global factors that dictate the employment landscape should have quite so much bearing on whether a degree is of quality or not. Many HEIs find it difficult to get employers to engage with them (e.g. regarding curricula and student placements), so it seems unfair to weigh the employment data so significantly.

Other negative effects include reduced cross-institutional collaboration, stunted practice sharing and a more competitive HEI environment.

21. Has the introduction of TEF impacted **positively** on research and/or knowledge transfer?

No/Too soon to tell.

If yes, how?

22. Has the introduction of TEF impacted **negatively** on research and/or knowledge transfer?

No/Too soon to tell.

If yes, how?

One point to consider is that HEIs feel the pressure of TEF, and so are more closed off to

ensure they get maximum gain for their developments, rather than previously being open for collaboration and institutional sharing. Subject-level TEF also makes intra-institutional collaboration and integration less likely. Staff are under increasing pressure, with fewer likely to engage in new developments or practices for fear that it counts against TEF scores. This may have reduced academic freedom. These types of activities should be encouraged and celebrated.

5. Is TEF worth it?

Terms of Reference 5: An assessment of whether the scheme is in the public interest

We are interested to assess whether the scheme provides outputs that are in the public interest and arrives at these outputs in a cost-effective way that meets public interest principles.

The review intends to consider research about the costs and benefits of provider and subject level TEF, but we are also interested in your views of the range of benefits, and costs, of the scheme to individuals, institutions and society.

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

Our main concerns are that current metrics are not able to give a fair and true picture, that TEF has made HEIs less open and engaged with practice sharing and that engaging with the exercise has diverted resource away from actual teaching. Anecdotally, we are not aware of HEI opt-out negatively affecting applicant numbers or reputational performance.

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

a. Provider-level TEF?

Provider-level TEF increases pressure on HEIs and requires a huge amount of staff time and resource. Furthermore, it leads to loss of collaboration within and between institutions.

It is difficult to see how provider-level TEF significantly benefits applicants; there are already "rankings" in the public domain and many of the metrics used in TEF are already available.

b. Subject-level TEF?

As already noted, there is a potential for subjects to disappear, leading to loss of educational breadth.

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

a. Provider-level TEF?

At the provider level, TEF could have the potential to inform student choices. HEIs have a responsibility for quality of teaching provision, and the TEF serves as a measure of that. An effective TEF will allow teaching to be charted in a similar way to research (REF), and this should help teaching and research efforts to be considered in a more comparative and fair manner.

We believe these are of limited value given other university "rankings" are already in the public domain.

b. Subject-level TEF?

This is of limited value unless the subject mapping is significantly improved.

6. Is TEF fair?

Terms of Reference 6: Any other matters that the appointed person considers relevant

The review will also consider whether the overall TEF process delivers effectively for all across a diverse sector.

In the following question, we are particularly interested in views about:

- providers in Scotland, Wales and Northern Ireland;
- harder to reach applicant/student groups;
- part-time students and part time provision;
- small providers;
- specialist providers and specialist provision;
- private providers;
- further education colleges providing higher education

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?

Employment data could suffer in areas that are struggling economically, such as south Wales or northeast Scotland. Further, negative TEF data for local HEIs could discourage employer investment in the area, compounding the problem and distancing the HEI from its local community, which is a rich source of investment and collaboration.

We suggest that using the same metrics to assess HEIs in the different UK countries is unfair and that there should be a level of country-wide tailoring to prevent bias towards HEIs within certain countries. This would address the fact that emphasis on metrics and the timing of academic years varies across the different UK regions and avoid some HEIs being favoured over others.

27. Are there particular types of students, provision or providers that are **advantaged** by the current design of TEF, in a disproportionate way?

Yes, areas with already high employment will receive good TEF scores and thus further increase investment and employment. Whereas lower scores attributed to the HEIs with poorer employment and employer links may be a deterrent for investment, thus further disadvantaging these providers.

If so, what changes could be made to address this?

It may be helpful to explore whether scaling TEF scores by local employment data could help address this. However, we accept that this is likely to be complex, especially considering that many students go on to find work in a different area from the one they studied in. Part of the problem is that it is challenging to track student destination data and so it is difficult to build up a true picture of long-term success.

Thank you very much for your helpful comments on all parts of this call for views.

You can keep up to date with the review at the GOV.UK [review page](#). We will share the outcomes of this call for views when the review reports in summer 2019.