

## Teaching Excellence Framework Technical Consultation – Response Form

Name/Organisation: Association of National Teaching Fellows

Response Dated: 11<sup>th</sup> July 2016

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

	<b>Respondent type</b>
<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 type="checkbox"/>	Trade Union or staff association
<input type="checkbox"/>	Other (please describe) Association of National Teaching Fellows

## 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.

This response has been provided by the **Association of National Teaching Fellows**, who are higher education teachers who have been recognised at a national level as excellent university practitioners through a competitive, peer-evaluated, process. Our draft response has been sent to the c550 members of our JISC mail NTF list and more than 100 members have engaged in discussions of this response to the technical consultation. One NTF indicated he did not wish to be associated with this response. Overall, more than half of our community have directly engaged in the consultations on TEF.

Our response to the first question is a qualified 'yes'. We welcome the explicit recognition in the criteria that engaging students in stimulating and challenging learning is an indispensable part of higher education. Teaching quality, learning environment and student outcomes, and student gain are appropriate criteria, although we are very concerned about:

- Teaching Quality. We do not agree that contact hours are a helpful indicator of teaching quality as defined by the criteria. It is not clear how the number of teaching hours provides an indication of the "stimulation and challenge" of learning; the extent to which course design is "effective in stretching students"; or the quality of assessment and feedback.
- Student Outcomes and Learning Gain: we would argue that current research on the efficacy of Grade Point Averages, as a measure of learning gain is inconclusive. Changes in GPA over a programme of learning are not necessarily evidence of a student's acquisition of skills and capabilities, since use of GPAs in universities where there is no feasible national curriculum, would not be comparable within or across universities. There is ongoing research on learning gain by the HEA, but approaches are not yet sufficiently agreed upon by the sector for the metric to be regarded as valid or reliable.

The major omission as we see it is a failure to include the following, as evidence of a commitment to excellent teaching:

- The proportion of all those who teach who have completed Post-Graduate Certificates and other accredited forms of initial training for new lecturers;
- Evidence of systematic support of new and experienced university teachers through mentoring and appropriate CPD to ensure those who teach keep their teaching skills honed and up-to-date;
- The proportion of all those who teach who have achieved UK Professional Standards HEA Fellowships at Associate Fellow, Fellow, Senior Fellow or Principal Fellow at an appropriate level for their respective roles. Some NTFs

would also welcome recognition of those who have been accredited/ recognised by their Professional, Regulatory or Subject bodies, or by other accrediting organisations like the Staff and Educational Development Association (SEDA);

- The proportion of university teachers and those who support learning who have achieved National Teaching Fellowships in recognition of individual excellent teaching.

Under the area of **Institutional Culture**, the NTF community would wish to see as indicators of excellence initial and ongoing training of teachers (through mentoring and regular CPD) together with measures of external recognition of capability, excellence and leadership as demonstrated through, for example, achievement of HEA Fellowships at all levels and National Teaching Fellowships. Initiatives such as the recent CATE (HEA) awards recognising team work will also be valuable measures to include.

Similarly, we would wish to see the criterion on **Course Design, Development, Standards and Assessment** indicating that these need to be fit-for-purpose and effective in stretching students to develop knowledge, skills and attributes that prepare them holistically for employment, further study and life-wide learning.

The crucial element here is confidence in the benchmarking technique and in the measures: these need to be robust, that is, they must generate an independent measure of 'what the University does' as opposed to presage variables, which should be separately calculated for these groups. The proposed measures are very narrow and not independent of each other. It would be normal to look for several independent measures, with correlated variables being avoided on the basis that as a measure they are estimating the same thing or at the very least linked by a third variable.

We would suggest that evidence to demonstrate how the environment is enriched should include linkages between teaching, research, consultancy and scholarship, with the opportunity to present, potentially as case studies, evidence of the impact of pedagogic research, the scholarship of teaching, and professional practice underpinning teaching and assessment.

### **Question 2 (Chapter 3)**

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

If such metrics are to be used, they should be benchmarked appropriately and account must be taken of institutional and subject contexts with regard to national market possibilities and trends. Local demographics, discipline, and geographic location can impact significantly. So for example, students on Art and Design or

Music courses tend to have portfolio careers and do not necessarily go into direct employment for some years, so uncontextualised use of 'highly skilled performance' metrics could result in demonstrably unfair TEF scores. Similarly, Business students graduating in geographical areas with high levels of disadvantage e.g. Sunderland will be disadvantaged by comparison with students graduating in London, with the former arguably having an even more important role in supporting regeneration of the local economy than those in the capital. Furthermore, HEIs should not perversely be deterred from recruitment of students onto programmes with high social value such as Nursing or Teaching with relatively low salaries. Similarly, it must be recognised that applicants from certain ethnic backgrounds are disadvantaged by unconscious bias on the part of recruiters, and this may impact on the scores of HEIs who recruit a large proportion of ethnic minority backgrounds.

Non-continuation data and DLHE returns are unreliable as metrics of disadvantaged students, and we would not wish HEIs to be deterred from recruiting students from less advantaged backgrounds as a means of 'gaming' the TEF outcomes. Such data is also a poor measure of excellence in relation to part-time students whose purposes of study may be very different from those of full time students.

**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

**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 do not agree with these metrics because including all students in the DHLE means that institutions with high numbers of older students who are not seeking work, students who are carers, students who are too ill or disabled to work, are included now in the total number from which the percentage achieving a positive outcome is calculated. Hence if 30% of an institution's students are sick, disabled, carers or retired, their success rate would drop by 30%, which inevitably disadvantages HEIs that have recruited more disadvantaged students.

We argue for the recognition that positive outcomes are much broader than paid employment, (for example, gap years, unpaid or voluntary work). We are pleased to see that in this consultation unlike earlier consultations, graduate salaries are not to be used as a raw metric. We would strongly disagree with this being introduced at a

later stage. Since graduate employment is such a key metric, we would wish to see outcomes modelled and risk assessed to ensure such metrics do not reinforce existing disadvantage for institutions already working hard to mitigate regional and disciplinary inequalities. **We feel this is an area that requires significant further discussion.**

### Question 3 (Chapter 3)

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

Yes                      No                      Not sure

We think the benchmarking needs to include a measure of social class. As it stands this is only included in the contextual information, and the consultation document states that this will be used to identify failure on the part of institutions with students from disadvantaged backgrounds if they do not achieve as well as students from more privileged backgrounds. Differences in achievement will be attributed to “differences in the quality of teaching and learning experienced by different student groups’ which ignores the impact of external factors driven by poverty (needing to work longer hours, being unable to afford help or support with caring responsibilities, being unable to afford to take up internships and volunteering) on retention, achievement and employment outcomes. It will undoubtedly penalise institutions with a commitment to inclusivity.

We would wish to see benchmark calculations better articulated and more explicit, with opportunities for dialogue between assessors and HEIs to clarify contextual information.

#### 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.

We do not agree. There is no statistically valid reason to have an arbitrary and consistent percentage point difference between the indicator and the benchmark. 1.96 standard deviations is designed to highlight only the top 2.5% and the bottom 2.5% of the data, adding a further constraint to this seems to only highlight significant outliers where the benchmarks are invalid rather than those who are exceeding expectations. As an example the University of Huddersfield is 9.1 standard deviations above the benchmark for Assessment and Feedback, the threshold at CERN for validating results is 5 standard deviations, this means a university can be substantially more confident that their students are more satisfied

than expected with their assessment and feedback than physicists are in the existence of the Higgs Boson and yet under the proposed system, they would not receive a flag for this because that particular parametric distribution has a standard deviation which is 1/20 of the arbitrarily applied percentage point difference. 1.96 standard deviations alone should be enough to highlight those that are performing well or poorly.

We argue that the approach for setting benchmarks must address geographic and university mission divergence (since some HEIs specifically address the needs of disadvantaged students more fully than others), as well as inequalities caused by relative financial disadvantages between universities, (for example, the impact on university estates caused by differentiated land values). However, for the sector to see these as fair, it would be important to risk assess and pilot them to avoid unintended and perverse outcomes.

#### **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.

We would prefer to see outcomes averaged over five academic years instead of the current emphasis at most HEIs of three years as this does not cover a full undergraduate lifecycle from recruitment to graduation. Account must also be taken of students on four year programmes including those taking a 'sandwich' year out.

#### **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.

The categories listed in point 88 (p. 26) seem sensible, although we would welcome clarity on what 'young' and 'mature' means in this context. Students starting university at 18, on average, include higher proportions of students with more advantaged backgrounds than students starting later with a gap between secondary and tertiary education.

#### **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.

By indicating 'not sure' here, it is because we do not agree that it is a simply binary question requiring a 'yes/no' answer. We agree with some aspects of this but our agreement is qualified by a request for clarity about what data will be included in data maps. How will the information on 'where students who study at the provider grew up' be classified? Is that by nation, local authority, or smaller unit, which might provide more nuanced data? Similar questions arise about 'where students who studied at a provider found employment'. Would a university in an area of high unemployment like Sunderland or Cornwall be penalised by the TEF if graduates found work in areas of high employment? If the TEF is to be considered fair by the sector, the metrics must be transparent and just.

**Question 7 (Chapter 3)**

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

Yes                  No                  Not sure

By indicating 'not sure' here, it is because we do not agree that it is a simply binary question requiring a 'yes/no' answer. We support an evidence-led approach that uses metrics plus additional evidence so long as this enables institutions to base their claims on substantiated achievements rather than assertion. We also agree that it is helpful that assessors would be free to seek clarification or verification, and the indication that the submission should cover teaching and learning excellence across its entire provision rather than successful but highly localised practices. However, it is difficult to see how an institutional case for excellence could reliably be made across a whole institution and we do not feel this is helpful if perverse behaviours and unintended outcomes are to be avoided

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

Yes                  No                  Not sure

Please explain your reasons and outline any alternative suggestions.

We believe the process should be light touch and welcome a holistic process that does not require substantial commitment of institutional resource for completion of the submission. Nevertheless, we would wish to see among the list of indicative evidence **Impact Case Studies** of the kind used in the REF evidencing scholarship of teaching to underpin pedagogic practice including publications by an HEI's teachers and learning support staff reporting evidence of the impact of pedagogic

research and projects on student learning. Similarly, ready-made case studies of excellence in leadership of learning, teaching, and assessment are available in the form of successful HEA Principal Fellowship applications. We would not wish to see HEIs being free to submit unlimited supporting material as this would make its review excessively onerous.

### **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?

By indicating 'not sure' here, it is because we do not agree that it is a simply binary question requiring a 'yes/no' answer. Again, our agreement to one of these examples of additional evidence is qualified by our reservations about the value of **Grade Point Averages** as a means of measuring Learning Gain in a context where universities at the current time do not have readily transferable systems of GPA measurement or comparison.

**Involving students in teaching evaluation:** We agree in principle with including information about this within additional evidence but would suggest that approaches are variable from university to university. Many HEIs have excellent formal and informal mechanisms including module evaluations, effective training and use of course reps, staff-student forums, ongoing course or programme VLE discussion sites and other systems for collecting feedback from students throughout semesters using technology. Others rely simply on end of year evaluations. Some universities make extensive use of technology to collect feedback to improve the manageability of data analysis, but HEIs which use hard copy formats (administered by course administrators rather than the academics who teach them) report higher return rates. We would argue that a mixed economy of methods provides opportunities to achieve rich and productive data which could be used within the additional evidence. A key issue is how institutions use such feedback to effectively inform the development of learning and teaching.

The National Teaching Fellowship community is not convinced of the value of **Teaching Intensity** metrics, certainly at institutional level where averaging would be meaningless. In an era where there is broad recognition that student learning takes place in many contexts other than lecture theatres including a diverse ecology of

blended learning in HEIs and that 'contact hours' are malleable in an environment where substantial student engagement with those who teach them is undertaken in virtual learning environments and through flipped teaching (where students engage with content prior to classes and engage in activities within taught sessions), simply comparing class contact hours is not helpful.

Quantitative information demonstrating **proportional investment in teaching and learning infrastructure** is likely to be hard to capture and evidence, in particular if there is to be recognition of the existing unevenness of resourcing across universities for estates.

The National Teaching Fellow community includes NTFs with expertise in the uses of **Learning Analytics** and we would welcome the opportunity to be involved in supporting ways of better using student data to improve recruitment, retention and engagement. We anticipate that technologies to support learner analytics, tracking and monitoring of students' progress as being piloted by JISC will become sufficiently advanced in the next 5 years, and evidence of such approaches would be valuable we suggest within the TEF.

We welcome the focus on opportunities to evidence **recognition and reward schemes for excellent teachers and learning support staff**, including we would suggest, the proportion of university staff who are promoted to professorships on the grounds of their teaching excellence.

We would also welcome the inclusion of peer review comments, particularly those from external examiners as these are provided by colleagues who closely scrutinise programmes and therefore are in a very good position to comment on teaching excellence.

#### **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.

The NTF community would welcome commendations that are linked to evidence of pedagogic impact, for example through national awards for excellent teaching and learning support (including NTFs, THES awards and Professional, Subject or Regulatory body awards for outstanding teaching) and the achievement of national or

international research funding to explore the impact of innovations, technology and good teaching practice on student learning.

We disagree that these need to be relatively rare, so long as they are evidenced. We argue that this is an area for criterion not norm-referencing, that is to say, the number of commendations should be related to the quality of submissions rather than limited to a proportion of them. We do not agree that there should not be multiple commendations if merited. Such commendations could feed into publications showcasing excellent practice across the sector.

We do not agree that Excellence in Business Engagement should be a metric of excellent teaching unless such engagement is closely linked to curriculum design, delivery and assessment.

#### **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.

The NTF community welcomes a focus on fair selection of assessors and the emphasis on consistency and fairness as outlined in the process and would argue for the importance of reliability and validity also. We welcome the requirement that assessors should receive guidance, training and moderation in their decision making and the emphasis on a deliberative and dialogic judgment process to achieve consensual results. Among the NTF community there are many with expertise in assessment who would suggest that this process is unlikely to be straightforward, but we regard it as imperative that it is undertaken in this way.

#### **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.

It seems to us sensible that judgments be made that reflect the experience and track record of the providers.

**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.

Members of the NTF community are unclear about the value of the terms 'excellent' and 'outstanding' which many see as synonyms. The gap between 'meets expectations' and 'excellent' seems large. Perhaps the term 'very good' might be a better middle range term

**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

**BIS/16/262/RF**