

**Teaching Excellence Framework: Technical Consultation for Year 2**  
**A response by Universities Wales**

**1. About Universities Wales**

- 1.1. Universities Wales represents the interests of universities in Wales and is a National Council of Universities UK (UUK). Universities Wales' Governing Council consists of the Vice-Chancellors of all the universities in Wales and the Director of the Open University in Wales.

**2. Introduction**

- 2.1. The following response sets out our comments on the proposals contained in the Teaching Excellence Framework (TEF): Technical Consultation for Year 2 (the TEF 2 technical consultation) published by the Department of Business, Innovation and Science (BIS) on 16<sup>th</sup> May 2016.
- 2.2. Our comments focus on identifying issues that are specific to Wales and are intended to supplement the UUK response to which we and our Members have contributed, and to inform the discussions of the Welsh Government and BIS. For further comments, particularly on matters that do not raise issues that specifically reflect national context, please refer to the UUK response.
- 2.3. Before commenting on the specific questions set out in the consultation, we have outlined current arrangements for Wales and highlighted the key issues from our perspective.

**3. Arrangements for Wales**

- 3.1. The technical consultation indicates that BIS is working with devolved administrations who are considering whether or not providers in Wales, Scotland and Northern Ireland will take part in TEF Year 2 (p.4), which is intended to include the assessment of participating institutions and publication of outcomes in the academic year 2016/17 to inform the 2017/18 student recruitment cycle (primarily for entry in 2018/19). We understand that BIS is currently seeking a decision from the Welsh Government on participation in TEF Year 2 and beyond by the end of July 2016, i.e. shortly following the deadline of the current consultation.
- 3.2. Under current arrangements, TEF 2 is to be delivered by the Higher Education Funding Council for England (HEFCE), working with the Quality Assurance Agency (QAA), on behalf of the UK government. HEFCE has already begun the process of

appointing panel members and assessors for year 2 of TEF, and the closing date for applications was 1st July 2016.<sup>1</sup>

#### **4. Key Issues for Wales**

- 4.1. We see it as essential that Universities in Wales participate in Year 2 of TEF. This is seen as necessary on reputational grounds in particular, and the risks to institutions in Wales of not participating are seen as too high.
- 4.2. We recognise that a decision to participate is not without significant implications and risks for institutions in Wales, however, and the proposed BIS timescales pose a significant challenge. At this stage it has also not been possible to fully consider and make decisions across the range of options for participation by Welsh institutions. The proposed timescales also limit the extent to which Wales will be able to develop and implement appropriate alternative arrangements for Wales for 2016/17 in particular.
- 4.3. For this reason, we would like to see Welsh institutions participate subject to a number of conditions, including in particular:
  - The future ownership and governance of TEF needs to be appropriately shared between participating nations in taking forward its future development. This should include reaching an agreement on representation and decision-making processes at all appropriate levels, and extend beyond simply facilitating the participation of institutions from devolved nations.
  - The UK governments will work together on the development of a recognisably UK wide teaching excellence framework which allows the specific contexts and requirements of devolved nations to be appropriately catered for.
  - For Wales, as set out below, this includes in particular the need to take account of regional employment opportunities for graduates in the employment metric, developing nation specific contextual information that can be used by both institutions and panellists as part of the assessment process, and avoiding further complexity in TEF arrangements at this stage as far as possible (e.g. the use of commendations).
- 4.4. These options for participation of Welsh institutions are discussed in relation to four aspects of the TEF: metrics, assessments, incentives, and governance.

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<sup>1</sup> See [www.hefce.ac.uk/lt/tef/](http://www.hefce.ac.uk/lt/tef/).

## 5. (a) Metrics

5.1. At the moment we assume that Welsh universities will participate in the TEF metrics as a minimum and should be fully involved in their development at this stage.

5.2. In particular we would highlight the following comments at this stage (more detailed comments on the specific consultation questions are provided below):

- (i) The metrics should be capable of applying to all UK nations, and take into account differences in the national contexts.

As recognised in the White Paper, there will need to be careful work on the detail of the metrics with devolved nations to ensure that the robust indicators are adopted that can apply across the UK.

In particular, the benchmark for **employment metric** should take into account geographical factors. At the moment BIS only propose including some contextual information (see below).

- (ii) The priority must be to ensure that assessments are meaningful and robust.

As we have discussed above, participation in TEF for Welsh institutions is driven by the overriding consideration of reputation for quality. We have argued that financial incentives should not be linked to TEF outcomes in Wales, and would not welcome concessions being made to statistical robustness in order to accommodate the funding arrangements of a particular administration.

In particular, we would like tests of statistical significance to be in line with standard thresholds applied e.g. by the UKPIs. The use of two standard deviations appears to be too low.

Further work will also be required to validate the currently proposed conceptual model. In particular, we are concerned that there is lack of evidence to confirm that the TEF criteria do actually measure the aspects they purport to, and in turn that the three chosen aspects provide a reliable measure of teaching excellence.

- (iii) The way in which the relationship between the UK TEF and the QA systems is presented to potential users and stakeholders will need to be reviewed very carefully.

The TEF system needs to complement rather than detract from the robust and internationally respected quality assurance arrangements already in place. There are clear dangers that the TEF, with its multiple levels, is seen as superseding quality assurance assessments as the primary measure of quality rather than complementing them, and undermining its current status as the 'definitive reference point for UK higher education'.

BIS envisage that QA provides the quality baseline and that TEF indicates higher levels of quality. It is far from certain, however, that the QA and TEF are in fact measuring the same thing, or that their relationship does in fact operate in this way.

Unnecessary or artificial stratification of the sector on grounds of TEF could be potentially be damaging if it leads to misleading perceptions of divergence in quality standards across the HE sector.

It is particularly important to avoid unnecessary complexity in the development stages of TEF if it is to accommodate UK wide participation. For devolved nations considering an equivalent assessment system, it will be much harder to match arrangements with multiple classifications/levels between devolved administrations and agree on their equivalence. On these grounds, we would prefer there to be only three categories (or fewer) used. We would also not support the additional use of commendations at this stage.

## **6. (b) Assessments**

- 6.1. At this stage, there are a number of options for Wales's participation in the proposed assessment arrangements, including:

Option (a): Do not participate in assessments.

- 6.2. Assuming that Wales takes part in the metrics, the comparative performance of institutions in the metrics would be presented alongside other institutions, but Welsh institutions would not be classified. In our view, this is unlikely to mitigate the reputational risk for Welsh institutions, however, which would be in danger of being treated by third parties as equivalent to having a 'meets expectations' classification.

Option (b): Assess Welsh institutions on the basis of metrics only

- 6.3. This would mean that relevant contextual information is not taken into account for Welsh institutions, despite it being taken into account for institutions with similar

circumstances in England, and would be at the expense of exact comparability of results across the UK. It is possible that some individual institutions may benefit while others are disadvantaged by this approach. There appear to be risks for the sector in Wales overall, however, that this would under-rate the performance of institutions in Wales particularly in relation to the employment indicator. If this approach is adopted, we would need to be certain that the employment metric can be developed in time to take into account differences in employment prospects for different destination regions.

Option (c): Assess Welsh institutions on an alternative model which is determined by Wales but recognised as equivalent.

- 6.4. We understand, for instance, that Universities Scotland is seeking to have their own assessments recognised as equivalent, rather than to be assessed on the same basis as English institutions.
- 6.5. If Wales adopts this approach, it would require significant further work to identify appropriate alternative arrangements and agree their equivalence with BIS and other devolved nations. We would also need to clarify what 'recognition' would amount to in practical terms to ensure that stakeholders (including media and league table compilers) do actually treat the assessments as equivalent.
- 6.6. One potential option to explore, for instance, would be extending the current QA assessment process for Wales to take into account the metrics and identify higher levels of excellence, rather than seeking to conduct a separate TEF assessment process as proposed by BIS. On the face of it, this has a number of potential advantages. It could, for instance, reduce the need for creating an additional infrastructure to conduct assessments, and help to reduce overlapping information and reporting requirements. More importantly, it could help to address concerns about QA and TEF will operate together without the former being undermined.
- 6.7. This approach could also perhaps provide different devolved nations greater scope to tailor arrangements to national context and requirements. However, care would need to be exercised in this respect as significantly different approaches would increase the challenge of recognising 'equivalence' and we must stress that any tailored arrangements for Wales would need to be unequivocally regarded as equivalent and part of the UK TEF.
- 6.8. Instead, we would prefer there to be a shared concept of teaching excellence which underpins the TEF and has been developed on the basis of research and evidence rather than in response to political objectives, in much the way that the current

quality assurance framework applies across the UK and has been developed at arms-length from government.

- 6.9. If separate arrangements are made for Wales, we would need to be sure that any new arrangements are capable of being implemented for 2016/17. We see this issue as a particular barrier to pursuing this option for TEF Year 2. However, we would like this option being explored more fully as part of the TEF 3 development.

Option (d): Assess Welsh institutions according to the proposed BIS arrangements alongside institutions from England and other participating administrations.

- 6.10. In addition to the comments we make below on specific BIS proposals, we make the following points in this context:

- 6.11. In particular at this stage, Wales will need to clarify how BIS intends to fund the assessment process and what the potential implications would be for funding in Wales through the Barnett formula. If a service-charge model is adopted in England and/or Barnett formula funding for Wales is reduced as a result, for instance, this may have significant bearing on participation for Wales.

- 6.12. A significant concern that emerged from discussions at the BIS/the Welsh Government stakeholder event is that BIS currently envisages that institutions will be free to opt-in if they so choose. The danger is that institutions who do not expect to compare favourably may choose to not opt in for tactical reasons, and that if the metrics and assessments are based on the self-selecting sample of institutions only this could lead to unfavourable classifications for institutions that do opt in. In particular, this could be an issue for Wales if it decides to adopt a policy of participation *en masse*. We would welcome assurance that this issue could be satisfactorily addressed.

- 6.13. A decision will need to be reached in time to ensure that it can be implemented satisfactorily. If Wales confirms its intention to be covered by BIS arrangements at a later stage there is a potential risk that Wales will encounter issues with implementation (e.g. SLC type problem with issues over capacity/planning/ delivery for Wales). It is essential that further development of plans between BIS and the Welsh Government take into account the need to avoid such a situation.

Our view

- 6.14. In our view, the most feasible option is to participate in the BIS assessment arrangements for TEF in Year 2 (i.e. for 2016/17), but to explore the range of

potential options for Wales for 2017/18 and beyond by July 2017. However this would need to be subject to:

- Ensuring that the issues with the metrics and contextual information can be satisfactorily dealt with.
- Ensuring that a decision is reached early enough to ensure that Wales does not encounter implementation issues and enables Welsh institutions to be assessed alongside English ones.
- Clarifying how the assessment system will be funded, and how the cost of participation of Welsh institutions would be met.
- Reaching a satisfactory agreement on how the future ownership, governance, and steering of TEF will be shared between participating nations (see para 8, below).

## **7. (c) Incentives**

- 7.1. A key issue for Wales to address is the widening of the funding gap as a result of providers in England being able to access higher fees in connection with TEF arrangements.
- 7.2. We recognise, however, that the Welsh Government is unlikely to wish to replicate the fee policy in England, and that the funding issue can be dealt with independently from TEF. In our view, reputation is the key incentive for participation in TEF, and relative performance is could have much more serious implications for institutions than inflationary uplift in fees.
- 7.3. At this stage, our preferred option would be to separate the funding incentive issue from TEF and seek an equivalent to the inflationary fee increases to be made available to Welsh institutions as part of the wider solution to funding gap issues provided by the Diamond Review.

## **8. (d) Development/future steering of TEF**

- 8.1. It must remain a priority for us to ensure that effective collaboration on this is secured. We would like to see a UK TEF, rather than an English TEF with potential opt in for devolved nations. The key difference is shared ownership, governance and management of the framework, with an appropriate and effective structure for engagement between devolved sectors/administrations.
- 8.2. This must include ensuring appropriate and effective representation from Wales on all key forums and in decision-making at all levels to enable this. It would not be adequate to simply include Welsh universities in invitations for representation, or for pilot schemes, and seek their views in consultation alongside other institutions.

- 8.3. As indicated by BIS in its commissioning letter to HEFCE of 16 May 2016 we would expect HEFCE to work with the HEFCW to agree an appropriate arrangement to include Wales as part of the same TEF process. We would like the revised decision-making and steering arrangements for TEF to be set out in a revised commissioning letter to HEFCE (which BIS also indicated was a possibility).
- 8.4. Most immediately, we would like to see the composition of the assessment Panels reviewed before appointments are confirmed, assuming that Welsh participation is confirmed before the end of July, to ensure that there is representation from Wales and specialist knowledge of Welsh context/issues on each.
- 8.5. We would also like to see the TEF decision-making processes reviewed to ensure there is an appropriate share of ownership and governance at government level, and the agreement on arrangements set out transparently. At the moment, for instance, decisions on the conceptual framework for TEF and arrangements are a matter for BIS. However, should Wales confirm participation for future years, there needs to be a transparent and effective joint decision-making process established that enables all participating nations to share ownership.
- 8.6. Ultimately, however, if TEF is to be UK wide and maintain international credibility, we would like to see the further development of TEF, including decisions on the overall TEF framework (as well as the metrics that support it) to be determined independently from governments altogether, based on research and evidence (see comments below and the comments of UUK).

## **9. Comments on consultation questions**

- 9.1. For comments on the proposals which do not have a specifically Welsh dimension we refer to the response submitted by Universities UK, to which we have contributed. The following additional comments are offered:

## **10. Q1: Do you agree with the criteria proposed in Figure 4? Please outline your reasons and suggest any alternatives or additions.**

- 10.1. Not at this stage. We would like to see further work to confirm that these aspects and criteria are fit for purpose.
- 10.2. Figure 4 sets out the three aspects of quality which are considered to measure teaching excellence: teaching quality, learning environment and student outcomes and learning. It lists a number of proposed criteria for each of these.
- 10.3. There appears to be a number of issues with the conceptual model at the moment:

- (i) The aspects are intended to measure 'teaching excellence' but this is a concept which remains unclear at present. BIS assumes that TEF indicates higher levels of teaching excellence 'over and above' the quality baseline provided by current QA assessments, providing a 'single system'. It is far from clear, however, that QA and TEF are measuring the same thing, or that their relationship will operate in this way. Particularly in the early stages, the outcomes of any TEF assessments will need to be carefully handled to prevent undermining confidence in an internationally respected UK wide quality assurance system.
- (ii) TEF 2, for practical reasons, does not at this stage provide a comprehensive assessment of teaching excellence, and only includes a number of potentially relevant aspects. We need to be very careful about how the metrics and assessments are presented to ensure that they do not give a misleading or distorted picture of teaching excellence for students and other stakeholders.
- (iii) The proposed aspects and criteria need to be researched thoroughly, and tested with their intended audience. Although initially plausible, there is a lack of evidence at the moment to demonstrate that the chosen criteria are good/the best available measures of the aspect they purport to measure.
- (iv) It is also not clear how the aspects and criteria should be weighted at present. We would expect the impact of some these criteria to be greater than others in terms of an aspect. For instance, e.g. assessment and feedback has a relatively low correlation with overall satisfaction in the NSS (see the Interim Report of 2005 NSS).
- (v) An assessment against the criteria must rely on the additional evidence submitted by an institution and not the metrics. The examples in p.29ff., however, do not clearly map against these and may be inviting information which is not directly helpful in these assessments.

**11. Q2: A) How should we include a highly skilled employment metric as part of the TEF?; 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?; C) Do you agree with our proposal to include all graduates in the calculation of the employment/destination metrics? Please outline your reasons and suggest any alternatives.**

11.1. We agree with UUK comments. In particular, we would welcome consistency with the UKPIs in relation to the graduate population included. Otherwise, we support the proposals including the adoption of SOC groups 1-3 for purposes of the TEF metric.

**12. Q3: A) Do you agree with the proposed approach for setting benchmarks?; 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)? Please outline your reasons if you disagree.**

12.1. In particular, we agree with UUK that two standard deviations is too low as a threshold for significance. At this level we would expect 1 in 20 results to be incorrect. The main motivation for choosing two standard deviations appears to be to allow a greater number of institutions to be categorised at higher levels and receive the inflationary uplift to fees.

12.2. In our view the correct test should be determined by statistical rather than funding considerations, particularly if the TEF is to be used across the UK. It is considered more important that the TEF metrics/assessments are seen as statistically robust. In our view the threshold should be at least three, in line with the UKPIs.

**13. Q4: Do you agree that TEF metrics should be averaged over the most recent three years of available data? Please outline your reasons and suggest alternatives.**

13.1. In theory combining three years of data could help to provide more stable results by countering the potential effect of random variation between years. Our members have suggested some technical variants on this approach to explore in their individual submissions, e.g. the potential use of weighted average. The key issues with this approach from a specifically Welsh perspective, however, are:

- (i) The method for tracing mergers and name changes will need to be robust. We have previously raised concerns about UCAS's current approach to reporting recruitment history at institution level, and we would need to be sure that HESA data can be reported robustly despite institutional/code changes. There have been a significant number of mergers in Wales that could be reflected in the time series initially used.
- (ii) Institutions which are unable to provide three-years of data should not be eligible for assessment at higher categories. For Wales, the priority must be to ensure that the approach is statistically robust, and that concessions are not made in order to shorten the timescales required for new-entrants to build up a track-record that provides requisite assurance. We would not welcome an approach that allows a single year's data to be used. Basing results on a single year for some institutions but not others would mean that results were not directly comparable. It is likely to increase potential issues with small sample sizes. It should also not be used to remedy any issues in tracing mergers and name changes (see previous point).

**14. Q5: Do you agree the metrics should be split by the characteristics proposed above? Please outline your reasons and suggest alternatives.**

14.1. We see it as important for devolved nations that geographical factors are taken into account in the benchmarks – particularly for the employment/destinations metric.

This should reflect differences in employment prospects beyond the institution's control in different regions and nations.

14.2. Unless the metrics themselves take into account important geographical differences, institutions operating in different nations/regions may be disadvantaged when it comes to being interpreted by third-parties including league table compilers.

14.3. The most recent HESA student destinations data, for instance,<sup>2</sup> suggests that Wales has a very different profile from other UK countries that is potentially explained at least in part due to regional opportunities. Of the full-time first degree leavers who were employed in the UK, 61% were in posts classified as Professional employment (62% in 2013/14), compared to 71% for England and NI, and 72% for Scotland. The remaining 39% were working in occupational groups classed as non-professional. It is also clear that Welsh providers had a very high percentage of full-time UK domiciled leavers who were subsequently employed in other UK countries (39%) compared to providers in other UK countries.

14.4. Developing a robust model would presumably mean taking into account differences in the regional profile of graduates from an institution while making due allowance for displacement into areas of high employment due to lack of regional opportunities. We appreciate that this would require significant work and careful testing (particularly in relation cross-border destinations for Wales) but we see this as a priority for development and would welcome further specific proposals on how this could be achieved.

14.5. The consultation proposes that the contextual information includes data maps showing employment rates, and where student grew up and found employment (p.27). However, we think that it is insufficient to rely on contextual information only. Unless the effect of employment is calculated and included in a benchmark it will be difficult for an assessment panel to interpret and weight in a fair and consistent manner. Unless institutions from Wales follow the same assessment process as England, this information may not be taken into account at all.

**15. Q6: Do you agree with the contextual information that will be used to support TEF assessments proposed above? Please outline your reasons and suggest any alternatives or additions.**

15.1. See our comments in relation to data maps and geographical information in Question 5. In particular, we would welcome more detailed proposals on how the

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<sup>2</sup> HESA published its statistical first release on the destinations of leavers from HE for academic year 2014/15 on 30 June 2016 (see [here](#)).

metrics and contextual information relating to Wales could be developed, with appropriate involvement from the sector in Wales.

**16. Q7: A) Do you agree with the proposed approach for the provider submission?; B) Do you agree with the proposed 15 page limit? Please explain your reasons and outline any alternative suggestions.**

16.1. The 15 page limit appears to be too restrictive.

16.2. A particular concern from the perspective of Wales is that the individual submissions would need to devote a considerable portion of this to addressing issues which relate to their national context rather than their individual performance and circumstances.

16.3. It will be very important to develop detailed contextual reports for Wales (and different regions across the UK) that will assist individual submissions in this respect. This should include information on funding/funding systems, national policy (particularly where that could have a bearing on the particular metrics and criteria being considered), and regional context (e.g. employment levels, deprivation etc).

16.4. This could also be used to provide a number of alternative metrics that reflect the particular Welsh context – for instance, participation rates based on Communities First areas or Welsh Index of Multiple deprivation, which may enable a Panel to take a more rounded view of performance in the relevant aspects (we do not however at the moment propose that these replace UK wide indicators as the key metric). We would welcome more detailed proposals for developing the contextual information for Wales with appropriate input and involvement from the sector.

**17. Q8: 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? Please outline your reasons and suggest any additions or alternatives.**

17.1. We have identified no particular issues for Wales at this stage, and support the UUK comments.

**18. Q9: A) Do you think the TEF should issue commendations?; B) If so, do you agree with the areas identified above? Please indicate if you have any additional or alternative suggestions for areas that might be covered by commendations.**

18.1. Although we note the support from UUK members, our initial view (subject to further consultation with Members) is that the use of commendations should be avoided at this stage. We would not like to see further stratification of institutions within the sector on quality grounds at this stage, before there is robust evidence to justify it.

**19. Q10: Do you agree with the assessment process proposed above? 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.**

19.1. As indicated above in this briefing, Wales still needs to consider the potential approaches to assessment at this stage. This makes the timescale even more challenging, and we would prefer to see BIS implement a longer timescale.

19.2. In particular, the UK government/BIS and the Welsh Government will need to ensure that their respective arrangements are coordinated so that the bodies and agencies involved in the TEF process can deliver appropriate arrangements for each of the devolved nations. Capacity issues of the kind that have recently prevented Wales from implementing student support arrangements through the SLC, for instance, must be avoided.

**20. Q11: 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? Please outline your reasons.**

20.1. We agree strongly with the UUK that assessments should be conducted on the basis of a consistent set of metrics. An institution should not receive a higher award if there is insufficient evidence over a suitable period of time i.e. a provider does not have three years of metrics (see under question 4, on the treatment of mergers however).

**21. Q12: Do you agree with the descriptions of the different TEF ratings proposed in Figure 9? Please outline your reasons and any alternative suggestions. (Reproduced from Annex E on p. 54 of the technical consultation.)**

21.1. We agree with the comments of UUK that there is a lack of clarity on the definition of each award and how judgements will be formed for each level. It is also unclear if there is any statistical evidence for these levels/descriptions, and would welcome further research on these.

**Universities Wales  
July 2016**