



## Universities Scotland response to Independent Review of Teaching Excellence Framework (TEF)

**April 2019**

Universities Scotland is the representative body for the Principals and Directors of the 19 higher education institutions in Scotland.

We very much welcome the opportunity to contribute our views to the Independent Review of the Teaching Excellence and Student Outcomes Framework (TEF), on behalf of our member institutions. Currently, 5 Scottish institutions participate in institutional-level TEF, and 14 do not. In addition, two Scottish institutions participated in the Year 3 subject-level pilots.

We support the submissions made by Universities UK and Universities Wales. Our response to the call for views does not answer every question – it focuses on particular issues and concerns from a Scottish perspective, which we have previously raised with the Department for Education.

**Do you support the aim of assessing the quality of teaching excellence and student outcomes across providers of higher education? Please explain why.**

Higher education institutions in Scotland are absolutely committed to excellence in learning and teaching. We welcome the strong focus in the sector on teaching quality and mechanisms that effectively train that focus on enhancement of quality. We already have a rigorous and globally renowned approach to quality assurance in Scotland, which is underpinned by our Quality Enhancement Framework (QEF). The QEF includes several mechanisms for evaluating the quality of learning and teaching, and for facilitating a sustained focus on continuous improvement in these (and other) areas, for the benefit of students, both at institutional level and collaboratively across the sector. Institutions in Scotland, for example, remain subject to a process of external review by the Quality Assurance Agency in Scotland, and the QEF also requires them to undertake regular institution-led reviews of learning and teaching at subject level.

Our view is that the QEF provides a more effective mechanism for monitoring and improving the quality of teaching in Scotland than the TEF. We also note that Scotland performs very strongly on a wide range of metrics which measure student satisfaction and graduate outcomes.



Whilst there may be value in assessing the quality of teaching excellence and student outcomes *across* UK-based institutions in terms of supporting student choice, this depends on the design of the Framework and methodologies used to administer it. The methodologies must:

- support the key aim of helping students to make informed decisions about what and where to study, which means that it must be capable of measuring and reporting on what it is supposed to measure and report on in order to not be misleading;
- be sufficiently well understood by prospective students, who must also see value in it enough to actually use it
- seek to be as fair as possible from an institutional perspective, so as not to put some institutions – either by geographical location or by type – at an unfair disadvantage compared to others;
- place a reasonable burden on institutions, which is in proportion to its usefulness for prospective students.

Whether that is happening through the mechanism of TEF is highly debatable. TEF is not well understood or used by prospective students, and its emphasis on competition between universities runs counter to the collaborative basis of our approach to quality assurance and enhancement in Scotland.

In addition, as we detail below, there are a number of more specific concerns that the methodology used in TEF raises in Scotland which have not been effectively addressed.

## **Scotland-specific issues**

In this section we highlight issues arising from the TEF particularly from a Scottish perspective. These are the issues TEF would have to overcome if it were to build wide support among Scottish institutions.

### **Flexibility of the Scottish degree**

Scottish institutions mostly offer four-year undergraduate degrees. At many institutions and in many subject areas, this structure offers significant flexibility for students, and provides a wide variety of possible degree pathways. For example:

- At some institutions it is common for students to study multiple subjects, and also to switch subjects, so it can be very difficult to track a “typical” trajectory for a student graduating with a specific degree, or to define which faculty or department within an institution they ‘belong to’. In other words, the degree programme a student enrolls on initially is often different from the name of the



degree they qualify with, so exit outcomes don't necessarily help to inform entry decisions, which is relevant to the question of how meaningful subject-level TEF will actually be for prospective students.

- At some institutions the availability of a wide variety of entry and exit points means that articulation and other non-traditional learner journeys are common, generating significant data issues that are likely to be particularly acute at subject level. Students will have different experiences depending on the pathways they choose, and this may influence, for example, NSS responses, or student choices after graduation. Indeed, many students on some of these (and other) pathways are never captured in NSS data, nor their experiences (therefore) captured in the TEF.

### *Subject choice flexibility*

In this section we want to highlight some issues concerning subject choice flexibility which the TEF would need to be able to accommodate in order for it to be more acceptable in the Scottish context.

In Scotland, students generally have a great deal of flexibility in terms of what subjects they study, except on a limited number of degree programmes. This is especially true in their first two years of study. At the University of St Andrews, for example, on most Single Honours programmes in Year 1, typically only one-third of credits are in compulsory modules, providing students the flexibility to explore other subjects for the remaining two-thirds. Indeed, some Scottish institutions operate faculty-entry models, whereby students are not admitted to specific degree programmes at all, but to wider Faculties.

This flexibility in subject choice is reflected in a large number of programmes at many institutions. The University of Glasgow, for example, has over 600 distinct programmes, and the University of St Andrews has over 900. In some cases, a large proportion of programmes offered have at least two JACS codes, meaning that at least two different subject areas are involved. For example, the University of Strathclyde has over 600 programmes, more than half of which have at least two JACS codes, and the University of Edinburgh has almost 500 programmes, of which almost two-thirds have at least two JACS codes. Therefore, not only are there multiple pathways for many students, but there are also programmes that are not classifiable into one subject, which may be problematic for a subject-level TEF.

At many institutions, a significant proportion of students graduate with Joint Honours degrees. Due to the large numbers of programmes available, graduating with a Joint Honours degree in more than one subject is common at many institutions. At the University of Stirling, for example, about 40% of students who graduated in 2015-16 had completed a Joint Honours programme.



This flexibility is also reflected in many departments at some institutions routinely teaching students not on their own programmes. For example, the School of Modern Languages at the University of St Andrews commonly teaches around 25% more students (FTE) than are enrolled on its own degree programmes. In 2015-16 at the University of Glasgow, about one-third of module registrations were put on by a different School from the 'home' School of the student, and at the University of Edinburgh, about one-quarter of modules were put on by different Schools. In many cases it is possible for students to study modules from beyond the 'home' Faculty as well as beyond the 'home' School. These are significant proportions of students, so how can their experiences be reflect in the TEF?

At some institutions, a significant proportion of students switch programmes and graduate with a different degree from that commenced in Y1. For example, at the University of Glasgow and the University of St Andrews, around 50% of students do so. At the University of Edinburgh around one-third of students do so, and at the University of Stirling over one-quarter of students do so.

### *Ordinary degrees*

Ordinary degrees (i.e. degrees without Honours) are qualifications in their own right in Scotland, and some students choose to exit with this qualification after Y3. An Ordinary degree is, for example, the standard entry qualification for the nursing profession in Scotland. The proportion of students exiting with an Ordinary degree varies significantly across institutions, but at some institutions it is very significant – for example, at the University of the Highlands and Islands, 55% of students over the last three years exited with Ordinary degrees in order to enter or return to employment. Ordinary degree outcomes, however, are not captured by the NSS, so a significant proportion of qualifiers will not be captured by TEF, which, especially at some institutions and in some subject areas has implications for how meaningful TEF can be for prospective students.

### *Articulation*

Articulation is where a student enters directly into Y2 or Y3 of a degree programme with either an SQA Higher National Certificate (HNC) or Higher National Diploma (HND), which they achieved at a college. In some cases, the students will have been associate students of the university whilst at college, and typically colleges and universities work closely together to aid student transition and progression.

In some institutions articulation is not available, or is only a small element of provision, but in others it is a very significant entry route for students. The balance of Y2 and Y3 entry also varies across the sector. At Abertay University, for example, almost one-third of Scotland-domiciled entrants articulated, with over half entering directly into Y3. At Robert Gordon University, around 20% of Scottish domiciled entrants articulated, with



almost 90% entering directly into Y3. At the University of the West of Scotland, one-third of all degree entrants articulated, with about two-thirds of (over 20% of all students) entering directly into Y3.

Some courses may be available only via articulation, but often students enter Y2 or Y3 of a programme that other students have been following since Y1. The overall student experience will be different for these students, and some institutions report differences, for example, in retention for articulating students. At subject level, small effects as a result of articulating students behaving differently to other students could be amplified significantly, and these issues may be reflected in TEF rankings.

Some articulating students also exit after Y3, choosing to pursue an Ordinary degree. These students may only study at an institution for a single year, and thus may not ever be captured in the NSS. (Unlike students progressing from Foundation Degrees in England, these students will not be represented in the data of another provider eligible to participate in the TEF, as colleges in Scotland are not in scope due to differences in quality arrangements and metrics). In 2015–16, for example, at the University of the West of Scotland, about one in five articulating students entering directly into Y3 exited with an Ordinary degree after one year; at Robert Gordon University, about one in ten articulating students entering directly into Y3 did so.

### *Tertiary institutions*

Scotland has two tertiary institutions: the University of the Highlands and Islands and Scotland's Rural College (SRUC). Each of these institutions delivers both FE and HE provision and, as a result, a significant proportion of their students do not meet NSS eligibility requirements due to programme structure and/or non-traditional learner journeys being pursued. At the University of the Highlands and Islands, for example, fewer than half of students who achieved a degree in the last 3 years were in the pool for NSS. The NSS data metric, therefore, reflects only a small proportion of the institution's total HE student population, and most of its degree programmes in any given year do not have sufficient numbers of students to meet NSS data publication thresholds for individual programmes. Depending on the level of granularity chosen for subject-level TEF, this could mean insufficient NSS data are available.

### **Scotland's Quality Enhancement Framework**

A subject-level TEF will introduce a double burden on Scottish institutions, as the sector already has a well-established and rigorous process of subject review via the Quality Enhancement Framework (QEF). This is in addition to Scotland's comprehensive process of external review administered by QAA Scotland, called Enhancement-Led Institution Review (ELIR).



There is also a risk of confusion for students if QEF and TEF outcomes are seen to be inconsistent – this applies both at provider and subject level, and subject-level TEF is still at too early a stage of development to consider potential links or alignments with the QEF.

## **Metrics**

Outstanding issues related to provider-level TEF metrics (particularly the non-continuation and highly skilled employment metrics) risk placing Scottish institutions participating in the TEF at a disadvantage. There are strong concerns that the same issues will persist at subject level if the same metrics are used.

We are concerned that, as the TEF criteria included in the provider-level framework are not discipline-specific, these will not necessarily be equally applicable in all subject areas, or provide the most appropriate yardstick to support judgements about the quality of provision in a specific subject area.

We also continue to have reservations about several aspects of the metrics and benchmarking used in the provider-level framework, particularly the use of POLAR in benchmarking, the non-continuation metric, and the use of LEO data. These are explored in more detail below.

### *POLAR*

POLAR is widely acknowledged to be less useful in Scotland than it is elsewhere in the UK, and POLAR data for Scotland are not published by HESA, the SFC or the Scottish Government for this reason. HESA has not published any UKPIs based on POLAR since 2007/08, and their explanation for the unsuitability of the measure in Scotland is available [here](#).

POLAR divides the UK into areas according to HE participation. As Scotland has a higher rate of participation in HE than England, it has significantly fewer low participation areas, meaning that it is significantly less likely that Scotland-domiciled entrants to Scottish institutions will come from such areas. As a result, the Scottish Index of Multiple Deprivation is used instead of POLAR for TEF metric splits for Scottish institutions.

In Y2, however, POLAR was used in the benchmarking process for the highly-skilled employment metric for all UK institutions, including those in Scotland, despite its unsuitability for this purpose.

HEFCE's own analysis in 2016 confirmed that including POLAR in benchmarking of the highly-skilled employment metric had a negative impact overall on the performance of Scottish institutions against benchmark, and identified a negative impact on the flags of at least two Scottish institutions. Moreover, the rationale for including POLAR in the benchmarking of this metric is based on DfE analysis that explicitly only examined a



sample population of graduates from English institutions, so it remains unclear whether POLAR is, in fact, correlated with highly skilled employment outcomes for graduates from Scottish institutions at all.

We were, therefore, surprised and disappointed that from Year Three, POLAR is intended to be used to benchmark three metrics for all UK institutions: highly-skilled employment, earnings above the median, and non-continuation. This approach does not support a level playing field for Scottish institutions.

#### *Non-continuation rates*

In addition to the non-continuation metric now being benchmarked by POLAR, Universities Scotland believes that how retention data are calculated and subsequently captured in the TEF puts Scottish institutions at a disadvantage in at least two other ways. This is not a new issue, but becomes critical in the TEF due to the calculation of benchmarks using the UK-wide dataset, and the subsequent generation of flags. Firstly, the TEF metric (and underlying HESA data) on retention does not capture transfers to colleges in Scotland. For a number of years, the percentage of students recorded as transferring from Scottish institutions to other providers after the first year of study has been consistently lower than in the rest of the UK. A key reason for this difference is the transfer of students from Scottish institutions to HE-level enrolment in Scottish FE colleges, which are not captured in HESA's non-continuation data used to generate TEF metrics. Initial work by the SFC in 2016 indicated that if students transferring to an HE enrolment in a college in Scotland were included in the 'continuing' figures, the 'no longer in HE' rate for the sector would fall on average by 0.9 percentage points (with a range by institution of -3.2% to 0%). This is not an exact model of the impact on the TEF non-continuation metric, but it provides a reasonable indication. The exclusion of college transfers in Scotland from the calculation of the TEF metric is likely to lead to Scottish institutions on average having a higher non-continuation rate.

Secondly, the TEF metric is based wholly on data about non-continuation after the first year of study, and excludes other elements of HESA's UK Performance Indicators on retention, including resumption of study after a year out. On this measure, the Scottish sector has consistently outperformed the UK sector average for seven years in a row (i.e. as far back as data is available), suggesting that Scottish institutions are doing a consistently better job of supporting discontinuing students back on course. For example, in 2015/16, the proportion of students resuming study at the same institution after a year out was 14.8% for Scottish institutions, and 9.7% for English institutions. This success is not reflected in the single TEF metric on retention, however.

#### *LEO data*



In addition to the points already made, there are significant reservations in the Scottish sector about using the experimental LEO dataset within the TEF. As noted above, the relevant metric is benchmarked by POLAR, which is problematic for institutions in Scotland. Universities Scotland also has wider concerns about the shortcomings of LEO:

- It implies that graduate success equates to a high salary. The highest paid job is not necessarily the “best” job. In recognition of this, the relevant metric measures only the proportion of graduates earning over the median salary, rather than salaries per se. In our view, this only partially mitigates the fundamental problem, however.
- It ignores the role of learner choice. There are countless reasons a graduate may consciously choose a career path that is less lucrative, but is nevertheless valuable to our society and economy, and meaningful and rewarding to that individual.
- It ignores regional differences in salaries. Average pay varies significantly across the different regions of the UK, notably being highest in London and south-east England; this is not taken into account in the data, which will disadvantage institutions in Scotland and other regions. According to ONS figures, the median full-time gross weekly earnings within the UK was £569, but only two regions – London (£713.2) and the South East (£589.2) – actually had weekly earnings above this median. Scotland was the region with the third highest weekly earnings (£563.2), but this was below the UK median. Within Scotland itself there are also large disparities in earnings in different local authorities. By not taking this regional impact into account the LEO earnings metric is ignoring arguably the most important benchmarking factor and disadvantaging institutions outside of London and the South East, especially those whose graduates may be less mobile.
- LEO does not capture the incomes of graduates who are working on a self-employed basis. This is problematic for a sector developing enterprising graduates, and may have a particular impact on institutions with significant numbers of students choosing to pursue creative and entrepreneurial career paths.
- It ignores differences in working patterns. The dataset does not record employment in FTE terms, and this will have an impact on institutions with significant numbers of graduates who choose to work on a part-time basis. Also, we know disabled graduates are more likely to be in part-time work and less likely to be in full-time work than non-disabled graduates.
- It ignores EU and international students. As the dataset covers UK-domiciled students only, LEO overlooks Scotland’s significant international student body altogether, as well as any home students who choose to work abroad after graduation.
- It is historical. The dataset, by its very nature, looks backwards, involving a very significant time lag, and may not prove to be reliably predictive for recent





graduates, let alone current or prospective students. For example, the cohort covered in the last LEO data release graduated as the economic downturn began.

## **General points**

The risks of participating in the TEF from a Scottish perspective include:

- it detracting from our enhancement-led approach to quality, and challenging collaboration, diversity and other key Scottish sector principles
- the potential costs of participation (particularly in any subject-level elements)
- Scottish institutions being presented in an unfavourable light compared to institutions elsewhere in the UK, due to data comparability issues.

A core problem in designing a workable model of TEF for Scotland, especially at subject level, lies in balancing three competing objectives:

- achieving meaningfulness for students;
- securing the credibility of metrics, especially at subject level; *and*
- ensuring proportionality of burden on institutions.

### Meaningfulness for students

The primary aim of TEF is to help prospective students make good decisions about what and where to study, so it must be meaningful to them, especially if it moves to the subject level. If subjects are too broadly defined, however, it is unclear how a subject-level TEF would add value or provide any meaningful advantage for students over a provider-level TEF. On the other hand, if subjects are defined too narrowly, this would present significant challenges in terms of reporting on small numbers. Proposals that seek to address such problems may also limit meaningfulness for students. For example, managing the burden on institutions by assessing some subjects in more detail than others may be misleading or confusing for students if this inconsistency in the assessment process is not reflected in the ratings awarded.

### Credibility of metrics at subject level

We are concerned that a granular approach to subject definition is likely, in many cases, to involve assessment on the basis of very small numbers of students – and as a result, is likely to generate significant data problems. A high degree of granularity will risk limiting the availability of robust data in individual subject areas, and can also be expected to generate random, volatile fluctuations in data year-on-year that are not indicative of genuine or meaningful trends.

### Proportionality of the burden



Moving to a subject-level TEF would inevitably increase the burden on institutions, particularly if a granular approach to subject definition is adopted. At the same time, the added value of a subject-level TEF for institutions is unclear, particularly given that other markers of quality exist at subject level – and that Scotland, as mentioned, already has a well-established and rigorous process for subject-level review via the Quality Enhancement Framework.

It has been suggested that one way to reduce the burden could be to generate subject-level ratings on the basis of metrics only, but we would have serious concerns about any non-contextualised use of metrics.

### Other general considerations

- Parallels have been drawn between the TEF and the REF, and moving to subject-level TEF could contribute to a superficial impression of similarity. There is a risk that this will be an additional source of confusion for students and the wider public, in light of the significant differences between the two frameworks. In contrast to the mechanical, metrics-driven nature of the TEF, the REF involves a more rigorous assessment process, but on a significantly longer cycle of assessment. The most appropriate units of assessment will also likely be different – student and research data are collected and organised in different ways and for different purposes within institutions, and seeking to align the two could involve high costs for the sector.
- It is unclear at this stage whether subjects will be judged against the same subject at other institutions, or against all provision at all institutions. This raises questions about comparability within and across subjects, and whether and how the subject mix of an institution could influence its TEF outcomes.

