



Teaching Excellence Framework Technical Consultation

Response from the Chartered Association of Business Schools

The call for evidence is available at: <https://www.gov.uk/government/consultations/teaching-excellence-framework-year-2-technical-consultation>

The closing date for responses was **Tuesday 12 July 2016**.



Teaching Excellence Framework Technical Consultation – Response Form

Name/Organisation: Chartered Association of Business Schools

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

	Respondent type
<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 checked="" 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)

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.

Our members are largely supportive of the aspects included in the table, however they caution that extreme care needs to be taken in relying on student satisfaction to determine the quality of teaching. The evidence from the NSS indicates that there is a subject effect on reported levels of student satisfaction and this must be addressed, for example, by weighting of subject coverage when calculating institutional level measures. Furthermore, research shows bias amongst students based on the gender and/or ethnicity of their teachers; this should be acknowledged.

There is a further issue with NSS data in that students evaluate against their own expectations. They cannot possibly be comparing to similar courses in other institutions because they have no experience of what happens elsewhere. Effectively there is no benchmark or baseline against which these responses are referenced. Therefore it is difficult to use the outputs as a method of ranking institutions.

It is important to bear in mind different models of course delivery when using the metrics, for example, non-completion rates. In some institutions students are given the option of taking the same course over a two year intensive or traditional three year period. If part way through they choose to switch delivery method they are deemed to have withdrawn from one course and started a new course. This is clearly not the case, but non-completion statistics would record it as such. This penalises institutions that offer greater flexibility to students. Given the policy intention of enabling students to transfer easily between institutions based on their individual circumstances it might be preferable to look at continuation rates to the next level as well as or instead of to the next level on the same programme.

There is also a suggestion that there might be a measure of learning gain as it is commonly understood. This would reflect the value added of the teaching and give some reassurances that widening participation will not be deemed to drag down TEF results. Business Schools will be able to offer valuable input into the discussions around measuring learning gain as many have implemented measures around assurance of learning as part of their accreditation processes.

Finally, some of our members would like to see a measure of the proportion of 'teachers' with teaching qualifications such as the fellowship of the HEA as a sign of the seriousness with which the institution and the individual take their teaching responsibilities. This shows institutional commitment to teaching and learning development.

Question 2 (Chapter 3)

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

There is some feeling that this shouldn't be included for a number of reasons. The purpose of developing a skill is not necessarily so that a person can then take on a job utilising that skill. There is also the difficulty of self reporting on such issues. It is at best unreliable.

It is recognised that in some sectors graduates need to 'start at the bottom' and hence they may not yet be using 'high skills'? There is a tremendous difference between sectors as well, for example skills in banking are very different from the skills required for the aeronautical industry. There isn't an easy measure of this and comparisons across industries do not make sense, therefore it may be safer not to try.

It may be worth considering if there could be an approach using a hierarchy of skills, but again this would not be straightforward.

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.

It is not immediately clear why there is a need to categorise occupational groups. Views on their use are mixed because of concerns of how the metrics will be used. Clearly if the current coding is insufficient it should not be used, but a more representative one developed.

Care needs to be exercised in including all students because while it is right to include them all there must be a mechanism for taking into account regional and country differences in pay scales. Graduates in similar roles in London, rural Scotland and Africa, for example, will likely be paid very different amounts. This choice is not necessarily a reflection on the teaching they received.

To be truly representative there should also be a measure of the state of the particular sector as some industries are notoriously cyclical, for example shipping, and this will have a significant impact on graduates success in terms of getting a job and being paid well.

Given the importance of entrepreneurship to enabling economic growth and to ensure that perverse incentives are not introduced, it is imperative that we have robust systems for categorising self-employed graduates.

Question 3 (Chapter 3)

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

Yes No Not sure

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.

There seems no good reason to use 2 std deviations and 2% when the norm is to use three. Given the sensitivity of the input to changes in the number of students responding, especially significant in smaller institutions, it seems that concern should really only be raised where it very significant. An alternative would be to use z-scores.

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.

Any system needs to account for fluctuations and one off results (good or bad) and three years seems reasonable.

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.

Whilst some of our members are content with the split described, others have concerns regarding various aspects.

The first concern is a fundamental one, the consultation states that they “may be of interest to TEF assessors”. This is not sufficient reason to undertake this categorisation. Either it is something it is thought vital to do or it isn’t. If it isn’t then it shouldn’t be done. Further, surely the teaching quality should be the same

regardless of the characteristics of the student. This information may be valuable to institutions, but then it should be them that undertakes the research in the most suitable way for their students.

Other concerns are more practical. In smaller institutions such categorisation would be meaningless as the numbers would be too small.

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.

It is important that context is taken into consideration but it should be realised that the context of the institution may be irrelevant to the employment prospects of the students who may return home to other parts of the country or even world, where the context is very different.

Question 7 (Chapter 3)

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

Yes No Not sure

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

Yes No Not sure

Please explain your reasons and outline any alternative suggestions.

For the most part our members agree that a sensible limit is imposed, but there are questions about the limit being so small. This exercise should not distract from actually doing the teaching, however some of these areas are quite complex and require explanation. Therefore we would prefer to see the limit moved to 25 pages or to be proportional to the size or diversity of the institution.

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?

There is a desire for reassurance that such additional evidence will actually be used and not ignored in favour of a simplistic metric approach.

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.

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 detail provided is too limited to enable a full response, but it seems broadly appropriate.

The one glaring omission, which threatens the credibility of the whole process, is the inability to appeal, especially in the pilot and initial phases. This risks the outcomes being viewed through a political lens. We strongly recommend this be revisited.

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.

An alternative would be to wait until three years of data are available.

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.

Whilst we are pleased that the number has been reduced from four to three, it is our experience that trying to define degrees of excellence is more distracting than helpful and will result in greater disagreements than are necessary. Surely if this is about excellence then there is no need for degrees of excellence; either it is excellent or it isn't. For the sake of the credibility of the TEF and to avoid arguments around the boundaries it is best to stick with meets the requirement or doesn't.

Thank you for taking the time to let us have your views.

Further comments

The Chartered ABS is pleased that a number of positive changes have been made to the proposal since the green paper and remains committed to working with BIS to ensure the TEF is effective.

The Chartered Association of Business Schools is the voice of the UK's business and management education sector. We support our members to maintain world-class standards of teaching and research, and help shape policy and create opportunities through dialogue with business and government.

The UK's business and management education sector represents 1 in 5 university students and contributes £3.25b to the UK economy. Its management students go on to lead global businesses and its entrepreneurs contribute to our dynamic economy. Its research has an impact across society and helps to turn our capacity for invention into viable businesses. Our 150 members consist of 122 business schools and higher education providers, as well as affiliate stakeholders, corporate members and international partners.

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