



Department  
for Education

# **Government response to Dame Shirley Pearce's Independent Review of the Teaching Excellence and Student Outcomes Framework (TEF)**

**January 2021**





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**Presented to Parliament  
by the Secretary of State for Education  
by Command of Her Majesty**

**January 2021**



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# Contents

Introduction and vision for the TEF .....	6
Name, Purpose, and Principles .....	7
Structure and ratings system .....	7
Assessment Methodology .....	8
Implementation .....	8

## Introduction and vision for the TEF

The Government is firmly committed to ensuring that our higher education sector is better aligned to the needs of the labour market and economy; delivering high quality education that sets students on the right path towards excellent outcomes, levels up regionally and locally; and guarantees fairness and accessibility for all students.

We think that, not only should there be action to drive out low quality provision that does not secure good outcomes, but there should be incentives for universities and colleges to deliver excellence on all aspects of quality. The TEF has a central role to play in this. In developing our vision, we have carefully considered the report and recommendations of Dame Shirley Pearce's Independent Review of the TEF, which has now been published and laid before Parliament.

We are extremely grateful to Dame Shirley and the members of her advisory group. She conducted a thorough, objective, and wide-ranging review, engaging with an impressive number of people and institutions. She listened to a broad spectrum of opinion yet has clearly reached her own conclusions that are independent of the interests of the higher education sector and Government.

Here, we provide the Government's response to the Independent Review, and set out our vision for the future of the TEF. We look forward to working with the Office for Students (OfS) as it takes forward the development and implementation of a new TEF scheme. We will set out more detail on how we would like the OfS to do this in strategic guidance to the OfS.

We mostly agree with the Review's high-level recommendations, which provide a sound platform for the TEF to play a vital role in the wider quality regime, aligning with other measures and incentivising continuous improvement to ensure students benefit from high quality provision. Specific comments on individual recommendations are set out further in this paper.

We want the OfS to develop a revised and invigorated provider-level TEF, that contributes to driving improvements in all higher education provision and supports excellent outcomes for all our students, as part of the OfS's wider reforms for raising quality across the sector.

The TEF will be underpinned by the principles of transparency, relevancy, robustness, proposed by Dame Shirley and an additional principle of proportionality. As set out in our announcement of 10 September 2020, this Government is determined to help refocus university resources on the front-line activities of teaching and research at this time of significant pressure on providers, alongside a commitment to permanently reduce bureaucratic burden<sup>1</sup>. We also recognise that many providers have felt that too much burden was imposed upon them under the TEF, and we will want the OfS to ensure that, when implementing a revised TEF, they minimise the administrative burden on providers.

Given this, and the issues identified by the review and the subject-level pilots, we do not want the OfS to proceed with any form of subject-level assessments as part of TEF at this time.

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<sup>1</sup> Reducing bureaucratic burden in research, innovation and higher education  
<https://www.gov.uk/government/publications/reducing-bureaucratic-burdens-higher-education/reducing-bureaucratic-burdens-on-research-innovation-and-higher-education>

## **Name, Purpose, and Principles**

The Government would like the scheme to continue to be known as ‘the Teaching Excellence and Student Outcomes Framework (TEF)’. This name has a well-established brand value, and is increasingly understood, in the UK and internationally, to mean a rating on teaching, learning and student outcomes. We are confident that the changes outlined in this document set the right direction for the TEF and will enable it to make more informed and better understood judgements on students’ academic experience. We would like the OfS to continue to look at ways to improve the TEF further in the future, including continuously ensuring that it remains proportionate in its approach.

We agree with the Independent Review’s proposition that the primary purpose of the TEF should be the enhancement of quality and think it should be more clearly part of the OfS’s Regulatory Framework. A secondary purpose of the TEF is to inform student choice, helping prospective students to select the best provision for them.

The drive to improve the quality of provision must apply across all providers, not just those at the lower end (where the OfS is consulting on plans to introduce a more rigorous quality baseline). The TEF will sit within a wider quality regime, and form part of a system that ensures that providers above the OfS quality baselines, but that may still not deliver the quality that students deserve, are incentivised to do better.

We agree that the TEF should be underpinned by the principles of transparency, relevancy, robustness, and the additional principle of proportionality, given the Government’s priority of reducing unnecessary bureaucracy in the sector. For this reason, we do not want to move to subject-level TEF ratings, because we do not consider at this stage it can be achieved without significant burden. For the same reason, we will end the current approach of TEF running each year and expect the TEF to be a periodic exercise, taking place every 4 or 5 years. Its costs should also be kept proportionate and for each exercise the costs, for both providers or the OfS, should, at an absolute maximum, not exceed the costs per provider of the TEF exercise that has taken place to date. As part of the strategic guidance to the OfS, we will provide more detail on how we think these principles should be implemented, including what our proposed additional principle means in practice.

## **Structure and ratings system**

The Independent Review recommended a structure based on four aspects of quality – Teaching and Learning Environment; Student Satisfaction; Educational Gains; and Graduate Outcomes. We consider three of these to be appropriate, but the Government does not consider ‘Student Satisfaction’ to be an appropriate measure of excellence, as satisfaction can, potentially, be too easily obtained via a reduction in quality or academic rigour – we believe ‘Student Academic Experience’ to be a more appropriate aspect. We are asking the OfS to consult and develop proposals that consider the importance and deliverability of each of those aspects, and how they might align with the regulatory framework, and work with us to determine the most appropriate structure.<sup>2</sup>

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<sup>2</sup> Note that TEF uses a multifaceted approach to measuring quality. Other initiatives being developed may use a more restricted definition of quality, focused on outcomes. As TEF is intended to dynamically drive continuous improvement, it is important that it considers all aspects of quality, which includes, but is not limited to, student outcomes.

The TEF has, until now, rated providers Gold, Silver or Bronze. We agree with the Independent Review that there should, in future, be four TEF ratings overall, with the top three being signifiers of excellence to varying degrees. The new bottom category will capture those providers failing to show sufficient evidence of excellence, and it will be made clear that these providers will need to improve the quality of their provision. We will work with the OfS to confirm the names for the four ratings in due course.

## **Assessment Methodology**

We agree with the Independent Review's recommendation that provider-level ratings should be derived from robust data and structured submissions from providers and students. As stated above, we also agree that subject-level ratings should not be part of the TEF. This is in line with the principle of proportionality, ensuring the TEF is straightforward, non-bureaucratic, and cost effective.

In line with the recommendations of the Independent Review, we would like the OfS to ensure that the TEF ratings are based on an assessment of high quality, nationally gathered metrics and data (e.g., Graduate Outcomes, Longitudinal Education Outcomes and non-continuation data) and contextual qualitative information. It should use more than just earnings and should take account of regional variations. OfS will also need to consider if and how educational gain can be reliably measured. We expect the OfS to consider these issues as part of its developmental work and consultation exercises. Following the principle of robustness, we would like the OfS metrics group to take into account and address the concerns raised by the Office for National Statistics (ONS) when reviewing the robustness of its metrics and data. We would also like the OfS to be mindful of how metrics could measure the quality of learning delivered in a more flexible way over the course of a student's lifetime (e.g., part-time study), as well as those which measure outcomes from a full-time degree.

On 10 September 2020, we announced that we have asked the OfS to carry out a radical root and branch Review of the National Student Survey (NSS), with a focus on resolving aspects of the NSS that may act as a disincentive towards quality. The outcomes of the NSS Review will be important in considering the role the survey plays in the TEF assessment. We recognise that there is a place for students' feedback on the quality of their teaching and learning experience and we will work with the OfS to develop how this aspect of quality could be included.

It is important that the assessment provides ratings that are credible to students, parents, employers and providers. For this reason, the Government considers it essential that student outcomes should act as Limiting Factors, such that a provider should not achieve a high TEF rating if it has poor student outcomes. We will work with the OfS to determine how the Limiting Factors should work.

## **Implementation**

We now expect the OfS to consult on the new TEF Framework, having regard to the Government's views set out here and in the Secretary of State's strategic guidance letter to the OfS shortly to be issued. This consultation will align with those on the OfS approach to quality, and with the OfS Review of the NSS.

The Government would like to see the new Framework in place and assessments completed and published by September 2022.









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12