



Department
for Education



Teaching Excellence and Student Outcomes Framework: subject- level

Government consultation response

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Introduction

This document responds to the [Teaching Excellence and Student Outcomes Framework \(TEF\): subject-level consultation](#) which put forward detailed proposals on the design of subject-level TEF. The response also draws on evidence from two exercises that ran alongside the consultation: the first year of subject-level pilots (in which 50 providers took part) which was run by the Office for Students (OfS) and a research project about the TEF and student choice undertaken for the Department for Education (DfE) by IFF Research. The full findings from these two exercises are published in separate documents (see related links below).

We set out our intention to undertake TEF assessments at a subject (disciplinary) level in the White Paper '[Success as a knowledge economy](#)' (May 2016). The Government sees the movement to subject-level as an important development in TEF, ensuring that prospective students have information about a provider's teaching excellence and student outcomes in the subject they are looking to study. The purpose of the consultation, pilot and student research was to determine how to design subject-level TEF in the best and most proportionate way.

The Government decisions set out in this response document have informed the design of the second year of subject-level pilots, which is described in full by the OfS in their technical guidance (see related links below). The independent review of TEF, required by the *Higher Education and Research Act 2017* (HERA) will run alongside this second pilot. Full implementation of subject-level TEF is then expected to follow from academic year 2019-20 after the findings from the second year of pilots and independent review of the TEF have been considered.

Consultation process

The 10 week consultation period opened on 12 March and closed on 21 May 2018. A total of 223 responses were received, the majority of which were from higher education institutions (48%) and representative bodies (16%). We also received some responses from further education colleges (5%) and alternative providers (2%), as well as student representative bodies (8%) and a small number of individual students. For a comprehensive breakdown of respondents see Annex A.

Quantitative analysis of responses was conducted from those received by the deadline of 21 May 2018. Some responses before this date are not included in the numerical statistics as they did not make a clear selection in their responses to the multiple choice questions. All responses received, including late ones, were included in the qualitative analysis.

In addition to the formal written consultation, we actively engaged with the sector throughout the consultation period through a number of events. Views expressed at these

events were fed into the consultation process and have helped inform the Government response to the consultation. We hosted or attended around 30 events, meetings and roundtable discussions about the consultation with a range of stakeholders, including providers, students, representative bodies and subject bodies. In particular, we sought to engage directly with parts of the sector that we expected might be under-represented in the written responses, such as students and further education colleges, holding specific events for these groups.

Additional sector engagement

In addition to the consultation, the pilot and student research also involved significant engagement with the sector about subject-level TEF.

The pilot involved ongoing engagement with the 50 participating higher education providers, representing a diverse range of provision, and over 100 panellists, which included academics, widening participation experts, employer representatives and students. The deputy chair of each subject panel was a student representative, giving students a prominent role in the assessment and evaluation process throughout the pilot.

The student research involved two surveys undertaken between November and December 2017. The first survey received 1,806 responses from applicants to undergraduate higher education and the second survey received 2,035 from a combination of both applicants and students in their first and second year of study.

Related links

This document is one of a number that have been published in relation to the development of subject-level TEF:

- [a report of the findings](#) from the first year of subject-level pilots, published by the OfS;
- [Student research report](#), published on 21 June on GOV.UK;
- [guidance](#) for the second year of subject-level pilots, published by the OfS.

Summary of responses received and the Government's response

The principal focus of this document is to respond to the technical consultation on the proposed design of subject-level TEF, focusing on the 16 questions posed in the consultation document. In responding to the consultation, we have also taken into account the findings of the first year of pilots and the student research, which are relevant to certain questions but not all. Where the pilot and research have fed into our response, we have described how the consultation, pilot and research findings relate to each other

and how they have influenced the design of subject-level TEF being taken forward into the second year of pilots.

On the whole, there was broad support for most of the proposals set out in the consultation document. On all but two of the topics covered by the consultation, the majority of respondents agreed with the proposal. Two further topics also generated strong debate amongst respondents. There was broad agreement with the overarching principles of the proposed framework for subject-level TEF, including applying the existing elements of provider-level TEF, defining subjects using level 2 of the Common Aggregation Hierarchy (CAH2) (which has 35 subjects in its current form) and extending the maximum duration of awards.

Improvements to the TEF framework

While we will apply the existing elements of provider-level TEF at subject-level, the pilot identified a series of refinements that would improve some of these elements when applied to subject-level TEF. We have adopted these refinements and the OfS will test them in the second year of pilots before subject-level TEF is fully implemented.

A number of these refinements will improve the student voice in TEF and ensure the TEF focuses on what is most important to students. These include expanding the student engagement criterion and including two new core metrics from the National Student Survey (NSS) about the 'student voice' and 'learning resources'. These changes were suggested by the student panellists, who made a significant contribution to the pilot and demonstrated the importance of student panellists in the TEF assessment process. The student research also found that learning resources and facilities¹ was an important factor for students when they are deciding where to study. In introducing new NSS metrics, we will maintain the current balance and weighting of the NSS across the core metrics.

Improvements will also be made to the student outcome metrics. To reflect the important role of the Longitudinal Educational Outcomes (LEO) data in the TEF, the two existing LEO metrics will be included in the core metrics, rather than being supplementary. LEO offers a rich data set based on administrative data rather than self-reported survey data about graduate employment. It also measures sustained graduate outcomes over time, enabling TEF assessment to go beyond just short-term employment outcomes to also consider medium-term labour market and salary outcomes.

¹ In the research, this was presented as 'good resources and facilities are available to students', with the following definition provided: 'Whether students have access to a wealth of resources and facilities to support their learning, such as: Current, industry used, technology; Access to the relevant reading content; Specialist software for the necessary subject areas; Access to specialised areas to conduct research/studies (i.e. medical students have access to labs)'.

For full details of each of these changes and other refinements being made, please see the full government response to Question 3.

Subject-level assessment

There were two aspects of our proposed approach for subject-level TEF that were strongly debated by respondents: the model of assessment and the approach to assessing subjects with non-reportable metrics. Both of these aspects were also tested in practice through the pilot. While there was no strong consensus in the consultation alone, when considering the consultation and pilot findings together, it became clearer which elements of the proposed approaches worked well and which were less effective. A revised approach to both of these aspects has therefore been developed taking both the consultation and pilot feedback into account.

We presented 2 possible models of assessment: model A, a 'by exception' model, and model B, a 'bottom up' model. The pilot has demonstrated that the current TEF assessment process can be applied at subject-level, but for the outcomes to be robust, assessment needs to be undertaken for individual subjects, and all subjects need to be assessed. As such, we have created a revised model which involves comprehensive assessment of all subjects, with a separate submission for each subject. This combines the successful features of Models A and B, which were the nature of subject assessments in Model A (informed by individual subject submissions), and the comprehensive nature of assessing all subjects in Model B.

We understand that this revised model will lead to a higher burden on providers and a greater cost to run the exercise. We used the first year of pilots to test two models that included features specifically designed to reduce burden. The outcomes of the pilot have demonstrated that these features designed to reduce burden would not produce robust ratings. On balance, we believe that the first priority should be to develop a robust model of assessment that produces meaningful ratings for students. The OfS will work with providers and panellists in the second year of pilots to identify whether there are particular features within the revised model that could be adjusted in order to reduce burden without compromising the principle of comprehensive assessment of all subjects.

Grade inflation

Grade inflation is an important issue and the Government is committed to ensuring it is addressed so that students and employers can have confidence in the value of higher education qualifications. It was one of the more contentious topics in the consultation. In response to the question posed, the consultation demonstrated support for our proposal to apply the grade inflation metric only at provider-level and we will therefore maintain this approach.

We acknowledge however that challenges to the grade inflation metric were raised in both the consultation and pilot findings. While almost half of respondents agreed to our proposal, many respondents also stated that they did not support the continued use of this metric in the TEF at any level and the pilot found the metric was limited in its current form. To address these concerns, the OfS will use the second year of the subject-level pilots to test some refinements to the grade inflation metric, exploring how it can be improved. This includes presenting additional data such as trends in prior attainment alongside the grade inflation data to help panels better account for other factors that might influence grades.

The Government believes it is critical that the grade inflation metric continues to be part of the TEF. This will support wider work being undertaken to address grade inflation, including regulatory action at both the provider and sector levels. We believe this joint approach of tackling grade inflation through both the TEF and regulatory action is the most effective approach to address grade inflation. See Question 8 for full details of the evidence and government response on this topic.

Teaching intensity

The most contentious topic in the consultation was the proposal to introduce a new measure of teaching intensity in subject-level TEF. Respondents strongly disagreed with this in the consultation. Practically, the pilot tested two approaches to measuring teaching intensity. Panels found that neither approach meaningfully informed their judgements or the assessment process. The student research also suggested that teaching intensity was of low relative importance in student decision making when compared to other factors involved in teaching excellence and student outcomes.

These findings suggest that introducing a measure of teaching intensity in the TEF would not be an effective way to capture teaching intensity. We have listened to this feedback and decided it would be better addressed outside of the TEF.

Teaching intensity is an important issue and the Government believes a dedicated approach is needed to help students understand the teaching they can expect and to allow them to consider this factor when making decisions about what and where to study. To achieve this, the OfS will explore how students should be provided with more direct information about the amount and different forms of teaching they can expect from their chosen course. They are already engaging with their student panel to identify what type of information would make a positive difference to applicants and in what format students want to see this information. They will also explore how providers currently meet existing consumer law obligations to provide course information to prospective students and whether this could be improved. See Questions 13-15 for full details of the evidence and government response on this topic.

Next steps

All of the decisions set out in this response have informed the design of the second year of subject-level pilots, which will provide a final test of subject-level TEF before full implementation. The statutory independent review of TEF will run alongside this second year of pilots and its recommendations will be considered before full implementation of subject-level TEF. The final design of subject-level TEF that is taken through to full implementation will take account of the findings of the second pilot, as well as the outcomes of the independent review.

One of the overarching themes across the consultation responses was the importance of communicating subject-level TEF to students, both in terms of awareness of TEF and about how ratings are presented to applicants. The student research findings support this. Across all applicants surveyed in part one² of the research, a majority of 68% considered that subject-level TEF awards would be useful. When looking just at those applicants who were already aware of TEF, this increases to 82%.³ This suggests that greater awareness of TEF in general would increase applicants' appreciation for subject-level TEF awards. We agree that communication with students will be critical to the success of subject-level TEF. As such, the OfS is planning targeted communications to improve awareness of TEF. Alongside the second pilot, they will also undertake specific research with applicants and students to understand how TEF ratings should be presented to ensure they are meaningful to prospective students.

Summary of changes and decisions

Question	Summary of change or decision
Q1. Subject classification system	We will maintain the proposed approach of using CAH2 to classify subjects for the purpose of assessment and ratings. The Higher Education Statistics Agency (HESA) will review CAH2 in Spring 2019 and may make changes to reflect the findings of the consultation, pilot and student research. The OfS will also test a refined version of CAH2 in the second year of pilots to further inform this update exercise.

² To reflect the different objectives of the research, it was split into two distinct online surveys. The first (part one) focused on subject-level classification, and was directed at applicants. The second (part two) focused on teaching quality and student outcomes, and was directed at both applicants and current students.

³ 'TEF and informing student choice: subject-level classifications, and teaching quality and student outcome factors', Department for Education, 21 June 2018, available online at <https://www.gov.uk/government/publications/teaching-excellence-framework-and-informing-student-choice>

Question	Summary of change or decision
Q2. Duration and re-application	<p>As proposed, we will extend the duration of award, but the final decision about the maximum length will be made after the outcomes of the second year of pilots and independent review are known.</p> <p>The assessment process for subject-level TEF will be run every two years. As we are extending the duration beyond the current provider-level duration of 3 years, this means the duration of awards under subject-level TEF will be <i>at least</i> 4 years.</p> <p>We accept the arguments for a shorter re-application period. Re-application will therefore follow the assessment cycle, which will be every two years. This will give providers more flexibility and ensure that subject-level TEF can recognise enhancement when it occurs.</p>
Q3. TEF framework	<p>We will maintain the proposed approach to retain the existing elements of the provider-level TEF framework at subject-level, including the criteria, metrics, benchmarking, submissions, independent panels and rating system.</p> <p>The following refinements to these elements will be tested in the second year of pilots:</p> <ul style="list-style-type: none"> • separating the TEF criterion ‘TQ1: Student engagement’ into two distinct criteria; • introducing two new NSS metrics on learning resources and student voice (note that we will maintain the half weighting of NSS metrics and the overall balance of NSS in the core metrics); • bringing the LEO metrics into the core metrics, instead of them being supplementary metrics; • the feasibility of a new metric on differential degree attainment to measure attainment gaps.
Q4. Models of assessment Q5. Model A Generating exceptions Q6 and 7. Relationships between subject- and provider-level assessment	<p>We have combined the successful features from each model tested in the first year of pilot (Model A and B) to create a revised model which involves comprehensive assessment of all subjects. The revised model includes:</p> <ul style="list-style-type: none"> • provider-level assessment following a similar model to the current provider-level assessment; • subject-level assessment with metrics, submissions and ratings for each CAH2 subject; • a relationship between provider and subject level assessment that is not too prescriptive or formulaic and instead relies on the expert judgement of the panel.

Question	Summary of change or decision
Q8. Grade inflation	<p>The grade inflation metric will continue to be used as supplementary data in the provider-level assessment. This supports wider work being undertaken to address grade inflation, including regulatory action at both the provider and sector levels. We believe this joint approach of tackling grade inflation through both the TEF and regulatory action is the most effective approach to address grade inflation.</p> <p>OfS will use the second year of pilots to test refinements to the grade inflation metric, exploring how it can be improved. This includes presenting additional data such as trends in prior attainment alongside the existing data to help panels better account for other factors that might influence grades.</p>
Q9. Distribution of ratings	<p>We will maintain the proposed approach of allowing the distribution of ratings to vary naturally and for very high and low absolute values to be identified at subject-level using the same thresholds as at provider-level.</p>
Q10. Non-reportable metrics	<p>This issue will be tested further in the second year of pilots. In the pilot, a subject will be assessed if it meets both of the following requirements:</p> <ul style="list-style-type: none"> • for reportability, the subject must have reportable metrics for at least two metric types (the three metric types are: NSS, continuation and employment outcomes); • for assessability, we will test the introduction of a student cohort threshold. In the second year of pilots, OfS will be testing a cohort threshold of 20, meaning a subject needs to have more than 20 students to be assessed. <p>The OfS will also explore approaches to improve subject assessment to better accommodate small subject provision and improve assessability. The OfS will test two approaches:</p> <ul style="list-style-type: none"> • making more use of metrics where there is 90% confidence that performance is above or below its benchmark; • supporting providers to improve submissions for small subjects.
Q11. Additional evidence	<p>We will maintain the proposed approach of allowing providers to choose what and how they present additional evidence in their submissions, both at provider- and subject-level. This includes evidence of Professional Statutory and Regulatory Bodies (PSRB) accreditation and performance against the Quality Assurance Agency (QAA) Subject Benchmark Statements.</p>

Question	Summary of change or decision
Q12. Interdisciplinarity	<p>We will maintain the proposed pro rata approach for joint courses and will also apply this approach to all interdisciplinary provision where a programme maps to two or more CAH2 subjects. This means that students will be counted pro rata in the subject-level metrics against each subject that their course is mapped to. Providers can then reflect on their interdisciplinary provision in the submissions for each of the relevant subjects. This maintains institutional autonomy to choose subject codes, including use of the general subjects.</p> <p>The OfS will also test two refinements to subject-level TEF to improve the way interdisciplinary provision is captured:</p> <ul style="list-style-type: none"> • <u>better contextual data</u> at subject-level that gives panels information about the extent of interdisciplinary provision captured in each subject. For example, a list of the courses mapped to the subject and whether these are single subject or interdisciplinary; • <u>panel members</u> with specialist interdisciplinary expertise who will provide insight into interdisciplinary issues and advise the panel where needed.
Q13,14,15. Teaching intensity	<p>Alongside the responses to the consultation, we have considered carefully the evidence from the first year of pilots and the student research. These findings suggest that introducing a measure of teaching intensity in the TEF would not be an effective way to capture teaching intensity. It would not help the assessment panel identify excellent teaching or influence a provider's rating. A different mechanism will therefore be needed to help students understand the teaching intensity they can expect and consider this when making decisions about what and where to study.</p> <p>Given this, we think the best approach is for teaching intensity to be taken forward by the OfS outside of the TEF. The OfS will explore how students should be provided with more direct information about the amount and different forms of teaching they can expect from their chosen course. They are already engaging with their student panel to identify what type of information would make a positive difference to applicants and in what format students want to see this information. They will also explore how providers currently meet existing consumer law obligations to provide course information to prospective students and whether this could be improved.</p>

Question analysis

Question 1: Subject classification system

To define 'subjects' in subject-level TEF, do you:

- a) agree with using level 2 of the Common Aggregation Hierarchy as the classification system (CAH2, with 35 subjects), and if not, what other systems could be used and why?

Response	Total	Percent
Yes – strongly agree	15	8%
Yes – agree	96	49%
Neither agree nor disagree	30	15%
No – disagree	37	19%
No – strongly disagree	17	9%

- b) think that specific changes or tweaks need to be made to the definition of the 35 subjects in CAH2, or to the 7 subject groups used in Model B, and if so, please explain why?

Response	Total	Percent
Yes	135	75%
No	46	25%

Consultation findings

A majority of respondents agreed with using CAH2 as the subject classification system, recognising that by the time subject-level TEF is introduced, the CAH2 will be commonly used within the sector, recognisable to institutions and sector bodies and already linked to how information is presented to students.

Some respondents noted however that students may not fully understand how courses are mapped to subjects under CAH2 and therefore the way in which subject ratings are communicated to students will be critical.

Of those who disagreed with the use of CAH2, some felt that the CAH2 did not deliver the level of granularity needed to provide meaningful comparative information for students, especially in areas such as creative arts and social sciences, which were often considered to be too broad to be meaningful. A few respondents expressed concern that, as an aggregation, the CAH2 grouped together courses which are very different in structure, design and teaching approaches.

However, many others felt that the CAH2 appropriately strikes a balance between granularity and burden.

“The use of CAH2 subject classification [...] offers a balance in granularity and the practical logistical aspects of sufficient student numbers in a subject, the cost/burden of the exercise for both OfS and for the providers.” **Bishop Grosseteste University**

Most respondents felt that the CAH2 was the best pre-existing choice. However, one alternative suggestion, which was raised by some of the respondents, was to better align the TEF subject classifications with the REF.

While the use of CAH2 was supported, the majority of respondents felt that specific changes or tweaks would improve the classification system. Some of the recommended changes included:

- disaggregation of subjects – for example, splitting ‘creative arts and design’ into smaller subjects which better reflect the variation of provision;
- renaming subjects – for example, renaming ‘nursing’ to ‘nursing and midwifery’;
- general concerns – for example, concern that ‘subjects allied to medicine not otherwise specified’ is too disparate and students will have a hard time understanding what is contained within the subject.

There was a strong consensus amongst respondents that the 7 broad subject groups are not fit for the purpose of writing submissions in Model B. Respondents felt that group-level submissions did not accurately reflect the diverse nature of provision within the subject groups and that the groupings forced artificial relationships between faculties who would not usually interact. Instead, many providers said that they would prefer to write up to 35 subject submissions based on the CAH2.

Government response

The consultation, pilot findings and student research all support using CAH2 in subject-level TEF. The majority of consultation responses and the findings from the pilot both suggest that the CAH2 is at broadly the right level of aggregation and represents the best available option for subject-level TEF. The student research also found that the CAH2 was the best performing classification system of the three tested. It performed well for the majority of applicants in all three measures of success: 62% reported that CAH2 would provide sufficient information to help them choose where to study; 71% selected the

correct CAH2 subject area for their course (amongst students studying one subject area); and 68% reported that their course was ‘easy’ to classify in CAH2.⁴

Given these findings, we have decided to maintain the proposal of using the CAH2 to define subjects for the purpose of assessment and ratings in subject-level TEF. We believe the CAH2 appropriately strikes the balance between granularity, usefulness for students and burden. It aligns with the existing system of subject benchmarking currently used in provider-level TEF and is the best readily available subject classification system that has been designed with student information in mind. Once fully implemented, it will be widely used in the sector, be linked to how information is presented to students and be recognisable to institutions and sector bodies.

The consultation, pilot and student research all identified specific changes or tweaks that would improve how CAH2 would work for subject-level TEF. This suggests that the CAH2 could perform even better if changes were made to some of the subject areas. To address this, we have shared the suggested changes with HESA, who is implementing this classification system under the oversight of the Data Landscape Steering Group. HESA will run an update exercise to CAH2 in 2019, taking into consideration the suggested changes received to date from the consultation, first year of pilots and student research and any further changes identified from the second year of subject-level pilots. The OfS will test a refined version of CAH2 in the second year of pilots to further inform this update exercise.

Due to a strong consensus between consultation responses and pilot findings, we have decided not to use the 7 broad subjects groups for the purpose of writing submissions. Further detail on this decision can be found in the Government response to question 4, where we set out the revised model of assessment.

Question 2: Duration and re-application

Do you agree that we should have a longer duration and re-application period in subject-level TEF?

Response	Total	Percent
Yes – strongly agree	33	17%
Yes – agree	78	40%
Neither agree nor disagree	26	13%
No – disagree	39	20%
No – strongly disagree	21	11%

⁴ ‘TEF and informing student choice: subject-level classifications, and teaching quality and student outcome factors’, Department for Education, 21 June 2018, available online at <https://www.gov.uk/government/publications/teaching-excellence-framework-and-informing-student-choice>

Consultation findings

The majority of respondents agreed with the proposal to have a longer duration of awards, but there was a general preference among respondents for a shorter re-application period.

The key reason given for supporting a longer duration was to mitigate the higher burden of subject-level TEF compared to provider-level TEF. However, those in support also noted the need to balance this against the currency of the award and the data used to inform it. They felt that an older TEF award would be less meaningful for students.

“[...] to alleviate the burden of subject-level TEF on institutions, a longer duration would be required. We would also caution against too long a minimum re-application period, however, which we believe would block institutions seeking an up-to-date assessment without a compelling rationale.” **Universities Scotland**

Currency of data was also the most common concern for those who did not support a longer duration. They felt that the pace of change in the sector would not be effectively captured with a longer duration.

We proposed two options for duration and re-application in the consultation:

- option 1 – maximum duration of 5 years and re-application after 3 years;
- option 2 – maximum duration of 6 years and re-application after 4 years.

Opinion was divided over which option was more appropriate but views were slightly more weighted towards the shorter duration of Option 1. Respondents commented that this option strikes the best balance between burden and meaningfulness to students. A common caveat to this however was that the re-application period should be shorter.

Respondents felt that a shorter re-application period would be more appropriate for a number of reasons, mainly the need to recognise and reward improvements and achievements in the sector. They felt that a shorter re-application period would encourage enhancements and recognised the pace of change in a fast-moving sector. Respondents also commented that it would make the process more open for new providers just entering the sector, encouraging new provision.

“Given the size of our members we would prefer an annual assessment cycle, to ensure smaller and new providers are not forced to remain in TEF Provisional longer than necessary.” **Independent Higher Education**

Respondents offered several other alternative options for duration and re-application. Some respondents suggested a risk-based approach to re-application where only those providers and subjects whose metrics have changed would be assessed. They argued that this would ease the burden on providers as areas that are low risk would not be

subject to regular assessment. Others suggested that the TEF should be aligned with other assessment processes such as the Research Excellence Framework (REF).

Government response

The majority of consultation responses agreed with the proposal to extend the duration of awards to reduce the overall burden of subject-level TEF. We will therefore maintain this approach and have a longer duration under subject-level TEF. The exact length of that longer duration is yet to be decided, as we believe the final decision should be made after the outcomes of the second year of pilots and the independent review are known.

One of the findings from the first year of pilots was that undertaking subject-level assessment takes longer than provider-level assessment. Given this, and to further reduce burden on assessors and providers, we have concluded that the assessment process for subject-level TEF should be run every two years, rather than the current annual cycle of provider-level TEF. This means the duration of awards will need to be an even number of years so that a re-application process is being run when a provider's award expires. As we are extending the duration beyond the current provider-level duration of 3 years, this means that the duration of awards under subject-level TEF will be *at least* 4 years.

The final decision about the exact length of the duration will need to follow the principles that we should avoid unnecessary burden and ensure that TEF awards are current enough to be meaningful for students and providers.

Finally, the consultation demonstrated that stakeholders preferred a shorter re-application period to recognise improvements and facilitate new providers. We accept these arguments and will therefore allow re-application at each assessment cycle, which will be every two years. This will give providers more flexibility and ensure that subject-level TEF can recognise enhancement when it occurs.

Question 3: TEF framework

Should subject-level TEF retain the existing key elements of the provider-level framework (including the 10 TEF criteria, the same suite of metrics, benchmarking, submissions, an independent panel assessment process and the rating system)?

Response	Total	Percent
Yes – strongly agree	19	10%
Yes – agree	83	43%
Neither agree nor disagree	34	18%
No – disagree	43	23%
No – strongly disagree	12	6%

The consultation sought views on the design of subject-level TEF. In parallel, the practical operation and technical details of this design were tested through the pilot. This section reports on the views expressed as part of the consultation and how government intends to respond to them. It also incorporates related findings from the pilot that, together, influence the design of the second year of pilots.

Consultation findings

Key elements of the TEF framework

A majority of respondents supported the proposal to retain the existing key elements of the provider-level framework and apply them consistently across provider and subject-level assessment. These include: criteria, metrics, benchmarking, submissions, independent panels and the rating system. Respondents singled out the independent panels as a vital component of the process.

“The critical role played in TEF by peer review [...] allows both quantitative and qualitative evidence to be considered and weighed, leading to holistic and rounded judgments that recognise the full range and diversity of higher education provision assessed through TEF.” **Newcastle University**

Rating system

There was a specific concern raised by some respondents about the rating system and how it is understood by students both at home and abroad.

“The categorical system may be particularly problematic in driving perceptions and decisions of international students and their funding bodies, who may infer that any ‘non-gold’ institutions or subjects are of inadequate standard.” **University of Surrey**

Regional Benchmarking

A small number of stakeholders commented that regional data should be included in the benchmarking of employment outcomes. Comments on regional benchmarking were particularly common for the LEO metric.

“The LEO metric and indicator is skewed towards employment in the south and does not take account of regional differences. Having a single mean salary level is also favouring those institutions who have larger percentages of graduates seeking employment in London and the south east.” **Leeds Beckett University**

Metrics

While there was general agreement to applying the existing framework, a significant number of respondents made specific comments about using the LEO dataset and the weighting of the NSS.

Regarding the LEO metrics, respondents raised questions about the use of LEO while the data set was in its “experimental” phase, suggesting this could undermine the robustness of TEF assessments. Some respondents also felt that LEO is not a measure of value and were concerned that one career would be judged over another, influencing providers’ behaviour. A further concern was that it excludes data from international students and those working abroad. There was also concern that the ‘time-lag’ makes the data too historic and unrepresentative of current graduates.

“We continue to have concerns around the inclusion of LEO data. First, regional variation of salaries is not taken into account. Secondly, institutions which have a significant number of graduates entering public sector roles (eg nursing) may also be penalised. Unless action is taken to increase graduate starting salaries in the public sector, there is little institutions can do to affect the salaries of those graduates entering these vital professions.” **Coventry University**

There were mixed views presented about the halving of the NSS weighting. While some welcomed this change, others felt that it reduced the student voice in TEF assessments.

Government response

Key elements of the TEF framework

The consultation and pilot findings both support the proposal to apply the existing elements of the provider-level framework to subject-level TEF. The majority of consultation responses agreed to this question and the pilot concluded that subject-level assessments and ratings can be made in the same way that has been successfully demonstrated through previous TEF exercises.

We are therefore maintaining the proposed approach of applying the existing elements of the provider-level TEF framework at subject-level, including the criteria, metrics, benchmarking, submissions, independent panels and the rating system.

Rating system

The TEF rating system of Gold, Silver and Bronze provides clear and easy to understand ratings for students and this applies equally to both provider- and subject-level ratings. We will therefore retain the existing rating system in the second year of pilots. This system will be considered in full as part of the independent review of TEF being run alongside the second year of pilots.

Regional benchmarking

We will retain the existing benchmarking approach used for all metrics in TEF, which does not include geographical region as a benchmarking factor, as set out in the report of the TEF 'lessons learned' exercise (2017). The 'lessons learned' report contains full detail and analysis.⁵

Key changes as a result of the pilot

While the existing TEF framework will be retained, the pilot has identified a series of refinements that would improve some of the existing elements when applied to subject-level TEF. These refinements will be tested by the OfS in the second year of pilots before being implemented in subject-level TEF. These are set out in the sections below.

Criteria

The pilot found that while the criteria were useful for both provider- and subject-level assessments, having greater differentiation of the criteria at provider- and subject-level would enhance the process. While all of the TEF criteria will still apply at both provider- and subject-level, the OfS will test revised descriptions of the criteria to clearly distinguish the different expectations of excellence at provider and subject-level. Revised ratings descriptors will also be tested, as these are informed by the wording of the criteria.

The OfS will also test splitting out criterion TQ1 (Student Engagement) into two separate criteria, increasing the number of criteria to 11. This was suggested by the student deputy chairs of the pilot subject panels. We support this refinement, as we want to ensure that engagement with students is embedded sufficiently throughout the TEF process.

⁵ 'Teaching Excellence Framework: lessons learned', Department for Education, 7 September 2017, available online at <https://www.gov.uk/government/publications/teaching-excellence-framework-lessons-learned>

Metrics

The same set of metrics will be used at both provider- and subject-level. Several refinements to the metrics will be tested in the second year of pilots, as follows.

LEO metrics

The student research findings demonstrate the importance of graduate outcomes to students. The most important factor for both applicants and students was the likelihood of securing a graduate job. Earnings potential was also above average importance, being 9th for applicants and 6th for students (out of 20 factors).⁶ Research into the relative labour market returns of undergraduate degrees also found that studying the same subject at a different institution can yield a very different earnings premium.⁷

Therefore, we will retain the two LEO metrics and OfS will use the second year of pilots to test bringing these into the core metrics, rather than having them as supplementary metrics. This will simplify the assessment process and increase the prominence of LEO in TEF. This reflects the importance of employment outcomes to students, ensuring that medium term labour market and salary outcomes are fully captured in the assessment process.

To maintain the balance of core metrics across the three aspects of quality, only one of the metrics based on the Destination of Leavers from Higher Education (DLHE) survey will be retained, focusing on highly skilled student outcomes.

⁶ 'TEF and informing student choice: subject-level classifications, and teaching quality and student outcome factors', Department for Education, 21 June 2018, available online at <https://www.gov.uk/government/publications/teaching-excellence-framework-and-informing-student-choice>

⁷ 'Undergraduate degrees: relative labour market returns', Department for Education, 7 June 2018, available online at <https://www.gov.uk/government/publications/undergraduate-degrees-relative-labour-market-returns>

Responding to comments about LEO raised in the consultation

“The salary metric will value one career more than another (eg. bankers versus teachers)”

The salary based metric in TEF has been designed to recognise graduate jobs with high public value but lower private returns, such as nursing, midwifery or teaching. It measures the proportion of students earning over a threshold salary, which is based on the median salary for 25-29 year olds and is below the starting salary of professional, socially valuable graduate jobs such as nursing, midwifery or teaching. This means all careers where earnings are above the threshold are treated equally in the TEF metric.

“LEO is ‘experimental’ and therefore shouldn’t be used in TEF”

The experimental badge placed on LEO data did not reflect any concerns about data quality. Instead, it signalled that DfE was actively seeking feedback on the format and timing of the data releases. The data releases are now sufficiently mature that the experimental badging has been removed.

“LEO data has poor coverage and is therefore less accurate than DLHE”

As LEO is based on administrative data, it is more accurate and less open to sampling and respondent error than the survey data on earnings collected as part of the Destination for Leavers in Higher Education (DLHE). We have recently increased the coverage of LEO by including self-employment outcomes. However as the data is based on UK tax records, if a student moves abroad after graduating they will not appear in the data. Earnings and employment outcomes are an indicator of what a student could potentially earn should they choose to pursue a certain subject at a specific institution.

“LEO data is too historical”

We believe it is important to measure sustained graduate outcomes over a longer time period. Incorporating LEO metrics means the TEF assessment can go beyond just the short-term employment outcomes measured by the DLHE (and Graduate Outcomes Survey) to also consider medium-term labour market and salary outcomes.

“LEO shouldn’t be used because it doesn’t account for regional variation”

Earnings do vary across the country, reflecting differences in job opportunities, productivity levels and the local cost of living, and this will have some bearing on earnings outcomes. We are exploring whether and how this can be taken into account of this and will consider how regional variations might be better taken into account in some future presentations of the data. However, it should be stressed that not accounting for regional variations does not mean the data is misleading. The data still gives a true picture of the typical earnings of graduates and a better one than other sources, which also do not typically take account of regional differences.

“Salary is driven by other factors and these are not taken into account”

We recognise that graduate earnings can be influenced by a number of factors outside a provider’s control, such as gender, ethnicity, social class and prior attainment. This is why the LEO metrics in TEF are benchmarked following the same methodology as other TEF metrics.

NSS metrics

Student panellists in the pilot suggested that two new NSS-based metrics could be included to address the importance of learning resources and student partnership with higher education providers. The importance of learning resources was also shown by the student research, which found that ‘good resources and facilities’ was of above average importance for both applicants and students (being ranked fourth and sixth respectively, out of 20 factors). The 2017 update of the NSS means the questions about learning

resources now reflect on how they support students' learning and would therefore be appropriate for TEF assessment.

To reflect these findings, the OfS will test two new NSS metrics in the second year of pilots about 'learning resources'⁸ and the 'student voice'⁹. In doing so, they will maintain the half weighting of NSS metrics as well as maintain the same overall balance between NSS data and other data sources in the core metrics. The NSS remains a key component of TEF but, in order to achieve a more balanced assessment, the weight of each NSS metric was halved as part of the TEF 'lessons learned' exercise (2017). The 'lessons learned' report contains full detail and analysis.¹⁰

Differential degree attainment

In the first year of the pilots, concerns were raised, particularly by widening participation experts, that benchmarking and splits may not be enough to capture gaps in differential degree attainment. In response to this concern, the OfS will test the feasibility of new supplementary data about differential degree attainment at provider-level. This will measure attainment gaps by presenting data about the degree classifications (ie grades) awarded to students from different backgrounds. If this measure is feasible, it would support access initiatives by going beyond participation to ensure that all students achieve good outcomes.

Question 4: Model of assessment

For the design of subject-level TEF, should the Government adopt:

- **A 'by exception' approach (i.e. a form of Model A), or**
- **A 'bottom up' approach (i.e. a form of Model B), or**
- **An alternative approach (please specify)?**

Response	Total	Percent
A 'by exception' approach (ie a form of Model A)	58	33%
A 'bottom up' approach (ie a form of Model B)	54	31%
An alternative approach	65	37%

⁸ This metric relates to the resources and facilities available to support students' learning. For a full definition of the metric, please see the guidance documents for the second year of subject-level pilots, as published by the OfS.

⁹ This metric relates to whether students' views and feedback about their course are sought, valued and acted on. For a full definition of the metric, please see the guidance documents for the second year of subject-level pilots, as published by the OfS.

¹⁰ 'Teaching Excellence Framework: lessons learned', Department for Education, 7 September 2017, available online at <https://www.gov.uk/government/publications/teaching-excellence-framework-lessons-learned>

Consultation findings

There was no clear consensus in consultation responses about which model was preferred and neither model received strong support in its exact current form. However, there was more general consensus about which features of each model were preferred.

For Model A, respondents thought that the subject assessments with individual subject submissions were more robust and rigorous, giving students better information than the group submissions in Model B. Many felt this was a feature which should be taken forward in a revised model.

“In Model A if a provider chose to make a submission for Politics (or any other CAH2 subject), it would have 5 pages in which to make the case. This would appear to provide a more reasonable basis for the Independent Panel to make a judgement.” **Political Studies Association**

Some respondents were, however, concerned that the ‘by exception’ aspect of Model A was inconsistent, providing an incomplete picture that might be misleading to students. They felt that subject ratings would not be comparable across institutions as some would receive full assessment and others would not.

For Model B, respondents supported its comprehensive nature. They felt that assessing all subjects, rather than only assessing by exception, would be fairer and produce more reliable, accurate and robust ratings, providing better information for students. Some respondents also thought that assessing all subjects would encourage better engagement with TEF from all departments and faculties.

The key concern with Model B however, was the 7 subject groups, which were strongly opposed for the purpose of writing submissions. Respondents noted that, rather than achieving the purpose of reducing burden, the broad subject groups would make the submission process more burdensome because they would be more complicated and harder to write. Another common concern was the inability to provide sufficient evidence about individual subjects in the group submission.

“Model B involves (in some subjects) bringing together subject groupings that have little or no relationship with each other. The social science grouping, for example, includes a range of subjects from Architecture to Sociology [...]. It is hard to see how this grouping could write a coherent submission accounting for the range of subject-based innovations encountered in these different areas of the institution.” **University of Plymouth**

Respondents also agreed that focusing on a sub-set of the criteria in the Model B provider-level submission was not effective. They felt that the provider- and subject-level assessment needs to reflect on all 10 criteria.

Respondents made general comments about the burden of each model and noted the burden for providers in delivering TEF both financially and in terms of resource. They commented that TEF could take away valuable resource from students.

“We wish to emphasise in particular that a priority in implementing the subject-level TEF be that it does not place a significant administrative burden on departments, who we believe should prioritise the practice of providing top quality education and service to their students” **Cambridge University Students' Union**

Though there was a definite concern about burden, many respondents felt that burden should not drive the design of the policy and that we should consider robustness of assessment as a first priority.

“Whilst proportionality and value for money are of course important considerations, designing an exercise that focuses on minimising the burden for institutions and assessors rather than allowing for true differentiations to be visible to students can only undermine it.” **Goldsmiths, University of London**

The most common alternative model suggested by respondents was a variant of Model B where all subjects get assessed but instead of 7 broad subject groups, all subjects in CAH2 have a separate submission.

“We agree with the principle that every subject should be assessed [...] However, we do not feel that providing group submission documents is appropriate and would prefer to write a submission for every subject. We believe this is less burdensome than trying to aggregate subjects that do not naturally lend themselves to each other; it will also provide a more straightforward narrative for both prospective students and assessors.” **University of Northumbria at Newcastle**

Government response

The pilot has demonstrated that the current TEF assessment process can be successfully applied at subject-level but for the outcomes to be robust, assessment needs to be undertaken for individual subjects, and all subjects need to be assessed. The consultation also supports this finding, with many respondents arguing that we should move to full comprehensive assessment model. As such, we have created a revised model which involves comprehensive assessment of all subjects, with a separate submission for each subject. This combines the successful features of Model A and B. We received consistent feedback across both the consultation and pilot that the following features of the models worked well:

- the nature of subject assessments in Model A, which were informed by individual subject submissions and metrics (rather than grouping subjects together, which was proposed in Model B);

- the comprehensive nature of Model B, which means having an assessment of all subjects (rather than only assessing subjects ‘by exception’, as proposed in Model A).

The revised model brings these features together. It also maintains the key elements of the existing provider-level TEF assessment process, including independent peer review and holistic judgements across both qualitative and quantitative information. The revised model has the following features:

- provider-level assessment following a similar model to current provider-level TEF;
- subject-level assessment with submissions, metrics and ratings for each CAH2 subject;
- A relationship between provider and subject level assessment that is not too prescriptive or formulaic and instead relies on the expert judgement of the panel.

We understand that, in choosing a more comprehensive model of assessment, there will be a higher burden on providers and a greater cost of running the exercise. The two models in the first year of pilot were designed to test features that would reduce the burden of subject-level TEF: the ‘by exception’ element of Model A and the 7 subject groups in Model B. However, we received feedback from the pilot and consultation that these features were not sufficiently robust:

- the indicative subject ratings in the pilot indicate that the ‘by exception’ approach in Model A did not produce robust ratings for non-exception subjects. The pilot was designed to specifically test the robustness of a ‘by exception’ approach by actively assessing a sample of non-exception subjects (which would not ordinarily be assessed under Model A and would instead receive the provider-level rating). Assessment of this sample of non-exceptions showed that 40% would have ended up with a higher or lower rating than the provider rating had they undergone assessment. Concern about misleading ratings for non-exception subjects was also raised in the consultation;
- using the subject groups for submissions made it difficult for panels to assess individual subjects, as it was hard to identify evidence specific to each subject within the group. It also proved to be more burdensome for providers due to the amount of editing and condensing required to produce a group submission.

On balance, we believe that the first priority should be to develop a robust model of assessment that produces meaningful ratings for students. This is supported by those respondents to the consultation who commented that we should not focus on cost to the detriment of a robust process.

The second year of pilots will test the burden of the revised model and OfS will work with providers and panellists to identify whether there are particular features within the revised model that could be adjusted in order to reduce burden without compromising the principle of comprehensive assessment of all subjects. To partly offset the higher burden of subject-level TEF, we will also be extending the maximum duration of awards from the current 3 years at provider-level to at least 4 years under subject-level TEF.

The revised model of assessment

Figure 1 provides a diagrammatic representation of the revised model of assessment.

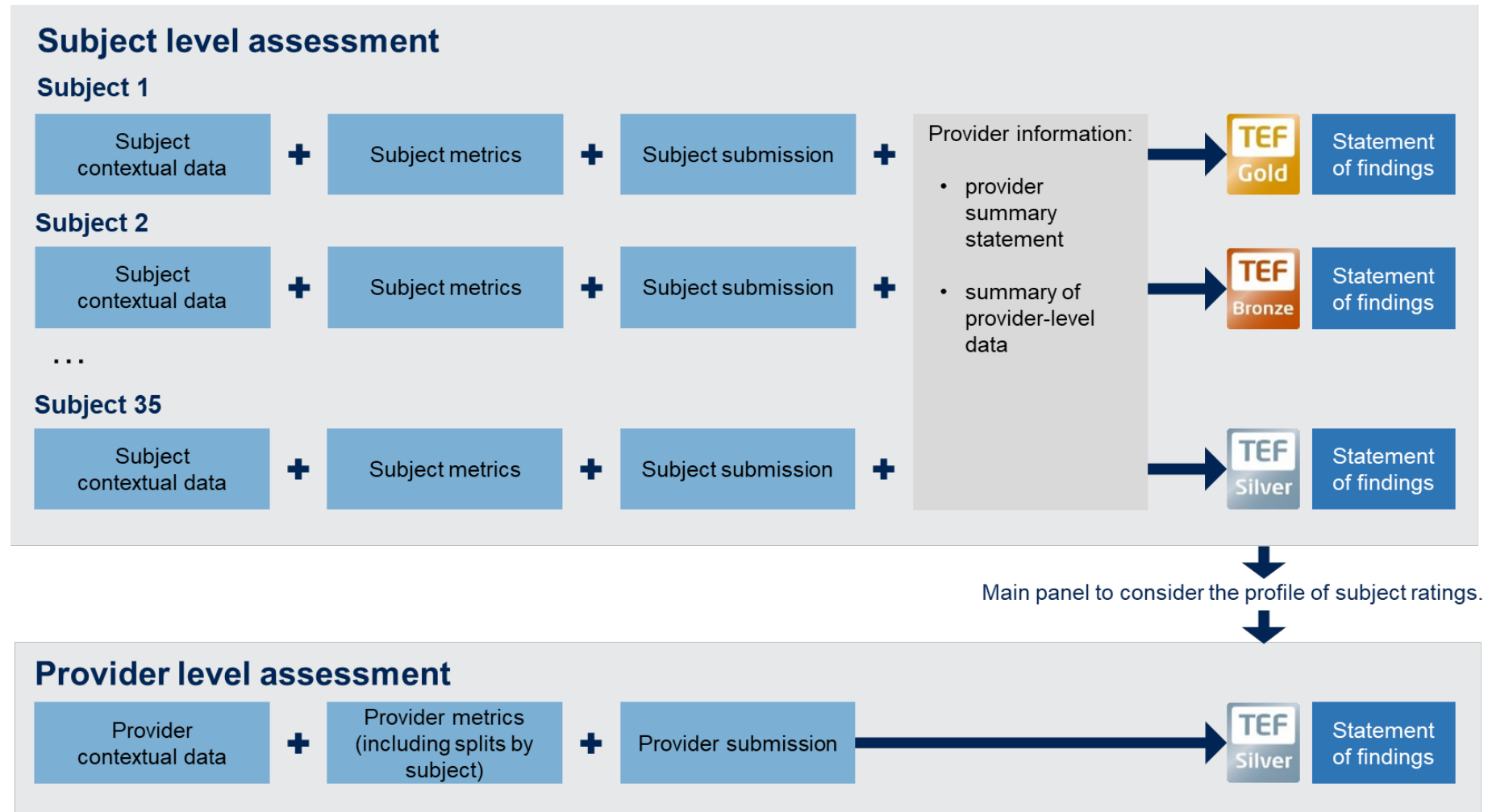
Provider-level assessment will be similar to the current system. The assessment will be informed by contextual data, provider metrics and a provider submission. The provider submission should cover all three aspects of quality and can include evidence against all criteria, as supported by the consultation and pilot findings. The provider-level metrics will also include a split of the core metrics by subject to facilitate the relationship between provider- and subject-level assessment.

Subject-level assessment will be undertaken for all CAH2 subjects, with each subject receiving a rating. Subject assessment will be informed by contextual data, subject-level metrics and a subject-level submission. To facilitate the relationship between provider- and subject-level assessment, a short provider summary statement written by the provider will also be included alongside the subject submission and panels will be given a summary of provider-level data. This was supported by the consultation and pilot findings.

As discussed in response to questions 6 and 7, the relationship between subject- and provider-level ratings is important. In addition to the features included in the provider- and subject-level assessment process outlined above, there will also be an opportunity for the main panel to consider the profile of subject ratings when finalising the provider ratings.

This revised model will be tested by the OfS in the second year of pilots. The final design of subject-level TEF taken through to full implementation will be subject to the findings of the second pilot.

Figure 1: Revised model of assessment¹¹



¹¹ This diagram shows the model of assessment for subjects that go through the assessment process. Providers may also have some subjects that are 'out of scope' for subject-level TEF or subjects that may not be assessed in the second year of pilots because they do not meet the assessment requirements of 'reportability' or 'assessability'. Please see the Question 10 of this document for a summary of the assessment requirements and the OfS guidance for the second year of pilots for more detailed information on out of scope subjects and assessment requirements.

Question 5: Model A – Identifying subjects for assessment

Under Model A, do you agree with the proposed approach for identifying subjects that will be assessed, which would constitute:

- a) the initial hypothesis rule for generating exceptions from the metrics?
- b) allowing providers to select a small number of additional subjects?

Response	5 a)		5 b)	
	Total	Percent	Total	Percent
Yes – strongly agree	11	6%	33	18%
Yes – agree	80	43%	75	41%
Neither agree nor disagree	29	16%	40	22%
No – disagree	35	19%	22	12%
No – strongly disagree	29	16%	11	6%

Consultation findings

The majority of respondents generally agreed with the proposed approach for identifying which subjects would be assessed under Model A’s ‘by exception’ approach. Those in support commented that the proposed approach would improve student information whilst also reducing burden.

“The proposed approach for identifying subjects that will be assessed [...] would allow for future students to make more informed decisions based on current subject-level provision and developments. In addition to the benefits for students, the reduced burden in relation to collation of submissions would ensure that the resulting costs of the exercise remains proportionate to the value added.”

University of Liverpool

In particular, there was support for allowing providers to select additional subjects for assessment. Respondents commented that this would allow provision to be better represented to prospective students. This also led a few respondents to suggest that providers should be allowed to put forward an unlimited number of additional subjects, indicating support for a model that is not necessarily ‘by exception’, but instead allows for full assessment of all or most subjects, at the provider’s discretion.

“We strongly support allowing providers to identify a small number of additional subjects if Model A is adopted, as this enables institutions to draw attention to improving progress or teaching innovation that might not be fully reflected by

quantitative metric analysis.” **Manchester Metropolitan University Students’ Union**

Despite the general support for the proposals, many respondents raised concerns. Relying solely on the metrics to generate exceptions was a common concern, suggesting that Model A’s approach was too focused on the initial hypothesis stage of assessment. To address this, a common alternative option suggested was to identify exceptions using the provider’s final rating, rather than comparing to the provider’s initial hypothesis.

Respondents also expressed concern that the process of generating exceptions was too complex. They suggested the complexity could make TEF less transparent and less meaningful to students.

“A subject with metrics that differ from the provider initial hypothesis only by flags changing to neutral is not an exception in the proposed method. A subject with no flags in a Gold university is also awarded Gold at subject level, where the same metrics result in a Bronze award at a Bronze university. This underlines the complexity and lack of transparency in model A. It makes the results less robust, and less meaningful for students.” **School of Oriental and African Studies**

Some respondents were also concerned about the proposed process of selecting additional subjects. There was concern about the risk of gaming, with providers ‘cherry picking’ subjects for assessment that they think will perform well, and about the burden of subject selection placed on providers.

“We feel that opening up institutions to select their own subject areas is likely to lead to system gaming, an increased staff workload and additional difficulties for prospective students when making comparisons across other institutions.”

Birmingham Guild of Students

Government response

As outlined above under question 4, the revised model of assessment will include a comprehensive assessment of all subjects and will therefore not face the challenges of identifying ‘exceptions’ or needing to choose which subjects to assess. This will avoid the concerns raised in the consultation about over reliance on metrics, complexity of exceptions and potential gaming if providers can choose which subjects are assessed. It also reflects the pilot finding that ratings for non-exception subjects were not sufficiently robust.

The main support given for allowing providers to select additional subjects was to make the process more representative of their provision. The revised model will capture this benefit by ensuring that where possible, all subjects in scope are represented in the assessment exercise whilst avoiding gaming.

Question 6 and 7: Relationship between subject- and provider-level assessment

Q6. In Model A, should the subject ratings influence the provider rating?

Q7. In Model B, do you agree with the method for how the subject ratings inform the provider-level rating?

Response	Q6		Q7	
	Total	Percent	Total	Percent
Yes – strongly agree	12	7%	8	4%
Yes – agree	47	26%	73	40%
Neither agree nor disagree	49	27%	51	28%
No – disagree	47	26%	28	15%
No – strongly disagree	27	15%	21	12%

Consultation findings

When embedded within discussion of either Model A or B, there were mixed views on the nature and extent of the relationship that should exist between subject- and provider-level assessment. However, more broadly, the majority of respondents supported the need for some form of relationship due to the interdependence between the quality of subject provision and the institution at which that provision is taught.

“The institution level cannot be completely independent of the subject ratings, as after all, you are a student at that institution to study a specific subject and an institution can only be as good as it's individual subjects and the student experience of teaching excellen[ce] (or not) on those subjects.” **University College London, Student**

Many respondents argued however that neither Model A or B offered an appropriate way of creating this relationship.

Under Model A, respondents argued that the ‘by exception’ approach did not provide an adequate view of all subjects, meaning that the subject ratings should not be used to influence provider ratings. Respondents were concerned that a feedback loop in Model A would give undue influence to exception subjects, with several suggesting this would incentivise gaming to positively bias provider ratings.

Under Model B, while there was general support for the subject-based initial hypothesis, concerns were raised about the potential for some subjects to disproportionately affect the provider rating under this approach. There were conflicting views on how the subject-

based initial hypothesis should be calculated in terms of which subjects should have greater weight. Many agreed with the proposed approach of weighting subjects by the number of students studying each subject, as it limits undue influence of subjects with smaller cohorts. However, other respondents argued this would not adequately reflect the excellent and influential teaching that takes place in smaller subjects. Several respondents added that weighting by cohort size may incentivise lower investment in small subjects.

Irrespective of the model, several respondents also queried the need for provider-level ratings once subject-level ratings were available.

“Is the institutional rating meant to represent a summary or aggregate of the subjects, or a more distinct holistic measure which recognises provider-level strategy implementation? If it is the former, then one can question why it’s needed”

Lancaster University

To improve the relationship between subject and provider assessment, a common suggestion by respondents was to give subject panels access to provider level information during the subject level assessment. Similarly, several respondents suggested using subject-level data as supplementary information in the provider-level assessment. These suggestions in relation to Model A and Model B were also raised in question 4.

“A better solution is for the subject panels to have access to the short contextual description and the provider metrics workbook, thus enabling key contextual information about the provider to be presented clearly at the beginning of the subject assessment process” **The Open University**

Government response

The consultation has demonstrated support for some form of relationship between provider- and subject-level ratings, but the concerns raised suggest that a prescriptive methodology for this could have unintended consequences. The findings of the pilot are similar. The panel found that the approach tested in Model B (using the subject-based initial hypothesis) caused anchoring of the initial hypothesis and as such, panellists and providers did not support this prescribed formulaic approach.

As outlined above under question 4, we will pursue a revised model of assessment that draws on the successful features of Model A and B. We believe it is important that this revised model retains both provider and subject ratings. The provider-level rating is retained to ensure that the TEF still reflects on strategic and institution-wide initiatives that affect students across the institution.

We will maintain a relationship between provider- and subject-level assessment to ensure the final suite of ratings are appropriate and coherent with each other. However,

to reflect the consultation and pilot findings, that relationship will be less prescriptive and rely more on the expert judgement of the panel.

In the second year of pilots, the OfS will test whether the following design features establish an appropriate relationship between provider- and subject-level ratings:

- in the provider assessment, giving panels a split of the core metrics by subject;
- in the subject assessment, including a short provider summary statement alongside the subject submission and giving panels a summary of provider-level data.

These refinements are in line with alternative options suggested by respondents in the consultation. The TEF assessment process also includes a moderation stage before final ratings are decided. In subject-level TEF, this will include an opportunity for the main panel to consider the profile of subject ratings when finalising the provider ratings. This will ensure consistency and credibility of judgements.

Question 8: Grade inflation metric

Do you agree that grade inflation should only apply in the provider-level metrics?

Response	Total	Percent
Yes – strongly agree	29	16%
Yes – agree	57	31%
Neither agree nor disagree	56	30%
No – disagree	20	11%
No – strongly disagree	22	12%

Consultation findings

Out of all respondents, 47% agreed with the proposed approach of applying the grade inflation metric only at provider-level. These respondents agreed that keeping the metric at provider-level would help smooth out short-term fluctuations that may be present in smaller samples at subject-level. They also commented that some providers set grade boundaries and exam conventions at a whole of institution level, although this was not universally agreed.

“Provider-level grade inflation metrics give a more stable, representative picture of outcomes within the institution. Measuring grade inflation at subject-level is less reliable due to small cohort sizes and short-term fluctuations in grades.” **Bath Spa University**

In addition to responding to the consultation question, many respondents also reflected on the role of the grade inflation metric in TEF more broadly, suggesting that the metric should be removed from the TEF completely. The key reason given for this view was that the metric is not precise enough to single out ‘inflationary’ practice over other legitimate reasons that grades may have improved. Some responses also highlighted concerns that the grade inflation metric may conflict with efforts to close attainment gaps for students.

“Such an approach fails to recognise that there are a number of factors which can affect trends in degree attainment including prior attainment, subject mix, student characteristics, improvements in teaching practice and student engagement, and so on.” **Russell Group**

Respondents also commented on the lack of background research into grade inflation and the driving factors behind the issue. Respondents felt this should be completed and considered before implementing the metric. They also commented that the reasons behind grade inflation are complex and range from provider to provider.

Many responses also suggested that grade inflation is a quality issue, not a teaching excellence issue, and it should therefore feed into baseline quality processes and registration monitoring rather than the TEF. A common alternative suggestion to having the grade inflation metric in TEF was to address this issue through the regulatory role of the OfS.

Government response

Grade inflation is an important issue and the Government is committed to ensuring it is addressed so that students and employers can have confidence in the value of higher education degrees across the UK.

In the consultation almost half of all respondents demonstrated support for our proposal to apply the grade inflation metric only at provider-level and while others raised concerns the government considers it to be an important issue so we will therefore maintain this approach. The grade inflation metric will continue to be used as supplementary data in the provider-level assessment.

We acknowledge that challenges to the grade inflation metric were raised in both the consultation and pilot findings. Many consultation respondents expressed a view that the grade inflation metric should not be included at any level in the TEF. In the pilot, panellists found the metric was limited in its current form, suggesting it is not precise enough to enable them to make judgements about why grades may have risen.

To address these concerns, the OfS will use the second year of the subject-level pilots to test some refinements to the grade inflation metric, exploring how it can be improved. This includes presenting additional data such as trends in prior attainment alongside the

grade inflation data to help panels better account for other factors that might influence grades.

Continuing to include the grade inflation metric in the TEF will support wider efforts on addressing grade inflation. Work is currently being undertaken by the UK Standing Committee for Quality Assessment (involving Universities UK, GuildHE and QAA) to investigate the causes of grade inflation and to identify and strengthen the sector's arrangements to ensure the comparability of degree standards.

Later in the Autumn, Universities UK will start a formal consultation with the sector. This will set out the evidence base and a detailed analysis of the causes of grade inflation, as well as a set of recommendations about actions that can be taken by providers to address this issue. The consultation will also propose a detailed 'degree classifications framework' that will include sector-wide descriptors for each undergraduate degree classification.

This work will be used by the OfS to inform its regulatory approach to addressing grade inflation. One of the four primary regulatory objectives of the OfS is to ensure that 'qualifications hold their value over time' and this objective is underpinned by a condition for registration that is applied to all providers. The OfS will also use the findings of this work to inform the refinements made to the grade inflation metric that will be tested in the second year of subject-level pilots.

We believe this joint approach of tackling grade inflation through both the TEF and regulatory action will be the most effective way to address this issue and ensure that students and employers can have confidence in the value of higher education degrees across the UK.

Question 9: Distribution of ratings

What are your views on how we are approaching potential differences in the distribution of subject ratings?

Consultation findings

Many respondents agreed with the proposal to allow the distribution of subject ratings to vary naturally for each subject, rather than forcing a uniform distribution. Respondents felt that allowing the distribution of subject ratings to vary naturally would increase the meaningfulness of subject-level TEF for prospective students. They also suggested it would allow for better comparisons across subjects by prospective students.

"We do not believe that quotas for subject ratings would be helpful in this case, as they risk misleading students about the relative worth of the courses they are undertaking. If all subjects in a group perform highly in a metric, this should be

reflected in the results, rather than some made to artificially look as if they are performing less well.” **National Union of Students**

The key concern from respondents about the distribution of subject ratings was the possibility of encouraging providers to close courses in subjects where similar courses received the same rating across many providers.

Responses about how to identify very high and very low absolute values in the metrics were varied. Overall, respondents offered more support for the proposed option to identify absolute values with the same thresholds as at provider-level, rather than for the alternative of subject specific thresholds. However, those who agreed with the proposed approach still highlighted some concerns with it.

Key support for the proposed approach to identifying absolute values (Option 1) was that it promoted consistency between provider-level and subject-level assessments. Some respondents suggested this would make it easier for students to compare between a subject’s rating and the provider rating.

“In terms of the impact of very high and low values at subject level, Option 1 would be preferable as it allows the thresholds to mirror the provider level metrics and so will allow a direct comparison between the two levels. It is also really very preferable to have a consistent system wherever it is possible” **Liverpool Hope University**

The most common concern about the proposed approach to very high and very low absolute values was that some subjects would be penalised, whilst some would have an advantage, when comparing their metrics to the whole sector. A similar concern was raised about the alternative option, however, with respondents noting that subject specific metrics would disadvantage subjects where the metrics are clustered.

Government response

The proposal to allow the distribution of ratings to vary naturally received general support from consultation responses. We have therefore decided to maintain this proposed approach. There was also more support for the proposed approach for identifying very high and very low absolute values than there was for the alternative. Therefore, we will also maintain the proposed approach of identifying very high and very low absolute values at subject-level using the same thresholds as at provider-level.

We believe the proposed approach to potential differences in the distribution of subject ratings will support the meaningfulness of subject-level TEF for prospective students. We acknowledge that there is concern that this approach could incentivise course closures, however, this will be monitored by the OfS, as there is a condition of registration that means providers must notify them if they intend to close a subject. Moreover, as part of

their general duties, the OfS is committed to ensuring students have a diverse range of high quality providers to choose from.

We further believe that maintaining the proposal to identify very high and very low absolute values using existing provider-level thresholds is the best approach. This will maintain consistency between assessments at provider-level and subject-level and is more appropriate where metrics are clustered, allowing very high and very low absolute performance to be recognised where it occurs.

Question 10: Non-reportable metrics

To address the issue of non-reportable metrics:

a) do you agree with the proposed approach?

Response	Total	Percent
Yes – strongly agree	9	5%
Yes – agree	67	36%
Neither agree nor disagree	39	21%
No – disagree	48	26%
No – strongly disagree	23	12%

b) when assessment occurs, do you prefer that assessors:

- rely on group metrics alongside any reportable subject-level metrics?
- rely on provider metrics alongside any reportable subject-level metrics?
- follow an alternative approach (please specify)?

Response	Total	Percent
Rely on group metrics alongside any reportable subject-level metrics?	40	26%
Rely on provider metrics alongside any reportable subject-level metrics?	53	34%
Follow an alternative approach	62	40%

Consultation findings

Overall, the response to Question 10a) shows there was no strong consensus about the proposed approach to assessing subjects with non-reportable metrics, but slightly more stakeholders agreed (41%) with the proposal than disagreed (38%).

One of the key points of debate was whether subject assessment should go ahead at all if there is less than a full set of metrics reportable. Those in support of going ahead with assessment were concerned that providers would be disadvantaged if they did not have

a rating for some subjects. Most respondents who disagreed with going ahead with assessment thought that ratings would be inconsistent, as some subjects would be assessed with all the metrics and some with less metrics. They felt this could be misleading to students and therefore having no rating was better. The one point that did gain consensus was that where a subject is not rated, clear information should be provided to students explaining why there is no rating.

If assessment was to go ahead with less than a full set of metrics, there was slightly more support for relying on provider-level metrics (34%) than group level metrics (26%). Supporters of both thought that these would be good proxies in the absence of subject-level metrics. Relying on group metrics received less support because in general, respondents did not think the groups were a good representation of individual subjects. However, there were still a number of respondents who thought group level metrics were a closer proxy for individual subject level metrics.

“We prefer that the assessors rely on provider metrics alongside any reportable subject-level metrics as this is more reliable as an overall indicator of excellence than group metrics (an outlier subject may disproportionately influence a group outcome).” **Loughborough University**

“Group metrics for the subject group are likely to be more closely aligned to the metrics for each individual subject due to shared experiences of students.”
University College London

Specific comments were also made about the optional element of the proposed approach, with concerns raised that some providers may choose not to enter weaker subjects.

“We feel that giving institutions with at least two reportable metrics the choice about whether to participate in the assessment gives rise to the possibility of gaming. Whilst we are supportive of provider choice, a clear justification should be required for non-participation (e.g. the subject is no longer taught).” **University of Reading**

Some alternative options to using group or provider-level metrics were also suggested. A common suggestion was to put greater weight on the submission or to allow an extra section in the submission to address non-reportable metrics, however, some thought that this would result in a ‘creative writing exercise’. Some respondents also suggested that a minimum size threshold was required for assessments to go ahead.

Government response

In addition to seeking views on non-reportable metrics through the consultation, we also explored their impact on assessment in the pilot. The consultation focused on the impact of small student numbers on the reportability of subject-level metrics. Alongside this

issue, the pilot has also identified a related issue about the assessability of subjects where there are small student numbers. These two issues can be differentiated as follows:

- reportability – whether the metrics are ‘reportable’ (ie whether they meet the existing reporting thresholds such as 10 students and response rate thresholds, which could affect small and large cohorts);
- assessability – for metrics that are reportable, whether the metrics have enough students contributing to them for the metrics to inform assessment.

A revised approach to addressing these issues will be tested in the second year of pilots.

A summary of this revised approach is provided below, followed by a detailed response on the two issues in turn.

Summary of revised approach

For the second year of pilots, we will test a revised approach that encapsulates both of reportability and accessibility where by a subject will be assessed if it meets two requirements:

- for reportability, the subject must have reportable metrics for at least two metric types (the three metric types are: NSS, continuation and employment outcomes);
- for assessability, we will test the introduction of a student cohort threshold. In the second year of pilots, OfS will be testing a cohort threshold of 20, meaning a subject needs to have more than 20 students to be assessed in the pilot.

These requirements relate to subject-level assessment only. As set out in the consultation, eligibility to take part in TEF will continue to be based on a provider having a suitable set of provider-level metrics.

Reportability

We will maintain the proposed approach that a subject needs to have reportable metrics for **at least two ‘metric types’** to be assessed at subject-level. The three ‘metric types’ are:

- NSS;
- continuation;
- employment outcomes.

The outcomes of the pilot indicate that this approach is appropriate. Across all subject assessments, for subjects with *only two* metric types reportable (one type non-reportable), over 90% were able to be rated by the panel and the assessment resulted in a distribution of ratings across Gold, Silver and Bronze. Conversely, across all subject

assessments, where *less than two* metric types were reportable (2 or 3 types non-reportable), less than 50% of subjects were able to be rated and where ratings were produced, there was less spread across the ratings. This suggests panels were only able to undertake a robust assessment if at least two of the three metric types were reportable.

All subjects that meet this reportability requirement will be assessed, as subject-level TEF should provide as much student information as possible. If we allow providers to choose whether a subject is assessed, subject-level TEF may have lower coverage and there is a risk of potential gaming, whereby providers avoid assessment for weaker subjects.

When subject assessment occurs with only two metric types, we will use the second year of pilots to test whether other existing metrics can be used alongside the submission to help inform the assessment. In the consultation, we proposed either group or provider-level metrics for this purpose. Given there was consensus across the pilot and consultation that the 7 subject groups were not fit for the purpose of writing submissions, we do not intend to use these for grouping metrics either. Therefore, the best available metrics to help inform assessment are at provider-level.

Therefore, where there are non-reportable core metrics at subject-level, the second year of pilots will test the use of provider-level metrics (including the reportable splits by subject) as additional information to inform the subject-level assessment. These provider-level metrics would be used as additional data to be considered alongside the submission. The OfS guidance to panellists for the second year of pilots makes clear that this provider-level data should carry less weight than the reportable subject-level metrics available for that subject. The guidance for providers also makes clear that submissions should include information to address non-reportable core metrics.

While this information is not a perfect substitute for non-reportable core metrics, we want to make the best use of available data and where possible, include consideration of metrics data for all of the core metrics. The extent to which panels rely on this provider-level additional data will be explored in the second year of pilots. The OfS will also undertake analysis to further understand the extent to which it is statistically robust to use provider-level metrics in this way.

Assessability

The challenge

Assessability of subjects with small student numbers was one of the key challenges identified by panellists in the first year of pilots, because the metrics often gave them fewer 'signals' to inform their assessment. When there are small student cohorts, it is statistically harder to achieve flags in the metrics and therefore, there is less differentiation and more initial hypotheses that 'default' to Silver due to a lack of flags.

With limited signals in the metrics, the panel questioned whether these small subjects were 'assessable'. To address this issue, all 7 subject panels suggested that a student cohort threshold could be introduced.

Data analysis undertaken by the OfS indicates that assessability of the metrics is particularly challenging when there is fewer than 40 students in a subject. Below 40 students, there is less differentiation of initial hypotheses in subject-level metrics (almost all subjects have a Silver initial hypothesis). There was also less differentiation seen in the final pilot ratings for subjects with less than 40 students.

While setting a cohort threshold would avoid some of the assessability issues faced by the panel, it would also exclude subjects from assessment and therefore have an impact on the coverage of subject-level TEF. Data analysis by the OfS shows that coverage would be a particular concern for Further Education Colleges (FECs), which often have many subjects with small student cohorts and would therefore see a large proportion of their subjects excluded from subject-level TEF. For example, a cohort threshold of 40 students would exclude 12.8% of all subjects across the higher education sector when compared to having no cohort threshold. When split by provider type, this would be 32.0% for FECs, 10.6% for Alternative Providers (APs) and 2.9% for Higher Education Providers (HEIs). At a much lower cohort threshold of 20 students, only 4.2% of all subjects across the sector would be excluded and the split by provider type would be 11.4% for FECs, 2.0% for APs and 0.5% for HEIs. A detailed table showing the coverage impacts is provided in Annex C.

The challenge presented by assessability of small student cohorts is therefore to achieve the widest possible coverage while maintaining a robust approach to using metrics. This includes making the most of available data, and enhancing submissions where possible.

The government believes that the TEF should reflect the diversity of the sector. This means that the requirements for assessment and the assessment process itself should accommodate all types of providers. However, we also want to maintain a robust assessment process that produces ratings in which the independent panel has confidence.

Further testing in the second year of pilots

Further testing in the second year of pilots is required before a final decision is made about a student cohort threshold. The second year of pilots is also an opportunity to test other options to address this issue.

To test this issue, the OfS will apply a cohort threshold of 20 students for subject assessment in the second year of pilots. All other subjects above this threshold (that meet the reportability requirement of at least 2 reportable metric types) will be subject to the full assessment process.

Applying a cohort threshold in the second year of pilots enables OfS to test the operational impact of a cohort threshold. However, we have purposefully set a low threshold of 20 students to test the issue further and gather more evidence before considering what the final cohort threshold should be.

Alongside testing a cohort threshold of 20, the OfS will also explore ways to improve subject assessment so that it better accommodates small subject provision and improves assessability. The OfS will test two approaches:

- **making use of metrics data at a lower confidence level of 90%**

The metrics data for small subjects can still give panels some useful 'signals' about performance, but these signals may not be visible when using the current approach to flagging the metrics at a confidence level of 95%. If subject-level metrics were considered at a lower confidence level of 90%, more signals could be identified by the panel and used to inform their assessment. This could improve assessability for subjects with small student cohorts by giving panels informative signals where there tend to be fewer flags.

Therefore, the OfS will test an approach to making more use of metric signals with 90% confidence level. This will be used by panellists as additional information;

- **supporting providers to improve submissions**

In the first year of pilots, panels reported that some submissions for small subjects could have been more helpful in supplying evidence that would enable them make better and more differentiated judgements in the absence of flags in the metrics. To address this, the OfS will test approaches for supporting providers to improve submissions about small subjects and explore capacity issues for providers with a large number of small subjects.

Finally, the OfS will also undertake research with prospective students to identify how best to communicate TEF outcomes where a subject is not assessed because it does not meet the reportability or assessability requirements. OfS will also work with pilot providers to understand the impact of this on providers.

Question 11: Additional evidence

Do you:

- a) agree that QAA Subject Benchmark Statements and PSRB accreditation or recognition should remain as a voluntary declaration, and if not, why?

Response	Total	Percent
Yes – strongly agree	43	23%
Yes – agree	82	43%
Neither agree nor disagree	28	15%
No – disagree	21	11%
No – strongly disagree	16	8%

- b) think that there are any subjects where mandatory declaration should apply?

Response	Total	Percent
Yes	58	36%
No	103	64%

Consultation findings

A large majority of respondents (about two thirds) agreed with the proposal to retain voluntary declaration of PSRB accreditation and reference to QAA Subject Benchmark Statements in submissions. Respondents felt that providers should be able to decide what evidence to include in their submissions.

Regarding QAA Subject Benchmark Statements, respondents noted that these focus on setting the minimum quality benchmark, rather than providing evidence of additional excellence above this baseline.

Regarding PSRB accreditation, respondents noted that the way accreditation is used in the sector varies considerably between courses and programmes and so could not be consistently applied across TEF. While respondents recognised that accreditation is crucial and constitutes a right to practice in some subjects, it is not fundamentally necessary in others and indeed some institutions purposely choose not to apply for accreditation. Moreover, some commented that not all accreditations necessarily provide clear evidence of teaching excellence.

“As is stated in the consultation document, there are differences in the nature and reasons for PSRB accreditations across subjects. It would therefore be difficult to determine which subjects should have a mandatory PSRB declaration.” **Imperial College London**

While a mandatory declaration for PSRB accreditation was not generally supported, those who did support it commented that accreditation is considered as an indication of quality within the sector and gives courses credibility. They considered that it can also aid student choice and can be misleading if this information is not provided.

Across those respondents who did consider a mandatory declaration appropriate, there was a general consensus that it should only apply where a licence to practice is a requirement for future employment.

Government response

The majority of the sector supported the proposed voluntary approach for declarations about QAA benchmark statements and PSRB accreditation. We will therefore maintain the approach of allowing providers to choose what and how they present additional evidence in their submissions, both at provider- and subject-level. This maintains flexibility for providers, allowing this information to be included where it is relevant and appropriate.

This approach still recognises the importance of accreditation information to students and the relevance of accreditation to TEF assessments, particularly for some subjects. The student research demonstrated that accreditation information is important to students. Out of 20 factors, a course leading to professional qualifications was fifth most important to applicants and third most important for students.¹² Given this, we do not wish to devalue this information in the assessment process and will continue to include both QAA Benchmark Statements and PSRB accreditation as examples of additional evidence for TEF submissions.

Better contextual data being tested in the second year of pilots will also help panels to interpret accreditation information included in submissions. In the first pilot, panels reported that it was challenging to interpret subject-level accreditation information because they were not always able to place it within the context of the courses and scope of provision covered by that subject. In the second pilot, OfS will test new contextual data, including a list of courses within that subject, to improve interpretation of this information.

¹² 'TEF and informing student choice: subject-level classifications, and teaching quality and student outcome factors', Department for Education, 21 June 2018, available online at <https://www.gov.uk/government/publications/teaching-excellence-framework-and-informing-student-choice>

Question 12: Interdisciplinarity

Do you agree with our approach to capturing interdisciplinary provision (in particular, joint and multi-subject combined courses)?

Response	Total	Percent
Yes – strongly agree	9	5%
Yes – agree	66	36%
Neither agree nor disagree	57	31%
No – disagree	31	17%
No – strongly disagree	20	11%

Consultation findings

The quantitative response data indicates that there was weak overall support for the proposed approach to capturing interdisciplinary provision in subject-level TEF. However, analysis of the written responses suggests this is because respondents have divergent views across the two approaches included in the proposal. For joint programmes, the vast majority of respondents supported the pro rata approach, with respondents noting that this seems to be a logical solution. In contrast, for other interdisciplinary provision, the 3 broad ‘general’ subject groups proposed were not well supported, with the majority of respondents commenting that these were too broad.

While there was general support for the pro-rata approach, there were still some concerns raised. Some commented that this approach could be confusing or misleading for students because ratings for single subjects may not fully reflect the experience received by students on interdisciplinary programmes.

More generally, respondents explained that interdisciplinary provision is more than just the sum of its parts. They noted that relying on ratings for the subjects that make up a course might not sufficiently capture the realities of the course as a whole. Moreover, in subject-level metrics, they felt that interdisciplinary students might be overshadowed by the large number of single subject students included. They also commented that it could be confusing for students to interpret multiple ratings, especially if they are conflicting.

“Joint and cross-disciplinary programmes, especially in the most innovative providers, are often more than the sum of the disciplinary parts providing opportunities for new kinds of synergistic learning that is of high value in employment.” **Royal Economic Society, Conference of Heads of Departments of Economics, Economics Network**

There was a broad consensus that the proposed approach for multi-subject programmes (using 3 broad 'general' subjects) would not be appropriate. Respondents suggested that the general subjects are too broad to provide useful information for students. Moreover, they were concerned that students would find it hard to identify how their course mapped to these subjects and felt that students would not be comparing 'like-for-like'.

An overarching concern was also expressed that the proposed approach might discourage providers from investing in interdisciplinary provision. Respondents felt this was of particular concern as interdisciplinarity is becoming increasingly relevant and important.

“We are concerned that Faculties/Schools/disciplines will be reluctant to invest in interdisciplinary teaching activities that might divert resource from subject-specific teaching. And yet interdisciplinarity is increasingly becoming a central goal of higher education and a key requirement of employers.” **University of Manchester**

After considering the challenges, the most common suggestion made by respondents was to use the pro rata approach for all interdisciplinary provision. Those that expressed this preference commented that it would be better than our proposed approach for tackling multi-subject programmes.

“The generalised categories proposed are very broad and will likely struggle to capture the accurate results of a number of courses. As such, we would recommend extending the pro rata system beyond dual degrees, to degrees including 3 subjects and on any other courses for which it can be used as an accurate reflection of interdisciplinary courses.” **Cambridge University Students' Union**

Other common suggestions made were to have a separate process for considering interdisciplinary provision, either through a specific subject category, a separate submission or a specialist panel. A few respondents also mentioned that lessons could be learned from the Research Excellence Framework (REF) assessment process.

Government response

The pro rata approach for joint programmes was well supported in consultation responses and was commonly suggested by respondents as a way to capture interdisciplinarity more broadly. We believe that this is the most viable and workable solution to capture interdisciplinary provision that spans across more than one subject.

We will therefore maintain the proposal to use a pro rata approach for joint courses and will also apply this approach to all interdisciplinary provision where a programme maps to two or more CAH2 subjects. This means that students will continue to be counted pro rata in the subject-level metrics against each subject to which their course is mapped. Providers can then reflect on their interdisciplinary provision in the submissions for each

of the relevant subjects. This maintains the current autonomy that institutions have to map their courses to the subject codes they deem best represent their provision, including whether they wish to make use of the general subject groups.

For courses spanning three CAH2 subjects (or more once courses can be mapped to up to 5 codes instead of 3), this means prospective students would need to look at three (or more) ratings to inform their decision. While this increases complexity for students on multi-subject courses (compared to using the general subjects), we think this is a proportionate approach given there is currently only 3% of students on courses spanning three different CAH2 subjects.¹³

We in no way want to discourage interdisciplinary provision. Findings from the pilot suggest that while the pro-rata approach can be used to reflect interdisciplinary provision in the metrics, providers still found it difficult to fully reflect their interdisciplinarity. To address this, we have worked with the OfS to identify additional refinements that could be made to subject-level TEF to improve the way interdisciplinary provision is captured. These refinements are based on suggestions made by the pilot panels and include:

- **better contextual data** at subject-level that gives panels information about the extent of interdisciplinary provision captured in each subject. For example, a list of the courses mapped to the subject and whether these are single subject or interdisciplinary. This information will better reflect the extent of interdisciplinarity in provision and make panellists aware of where they need to look for evidence in a submission;
- **panel members with specialist interdisciplinary expertise** who will provide insight into interdisciplinary issues and advise the panel where needed.

These additional refinements should support panels in accounting for interdisciplinarity in their subject assessments and will be tested by OfS in the second year of subject-level pilots.

¹³ Analysis by the OfS using the 2017-18 TEF metrics data.

Questions 13 to 15: Teaching Intensity

As part of the subject-level TEF consultation, we also consulted on whether to introduce a new measure of teaching intensity. The measures could be used as part of the TEF assessment process, or presented as stand-alone information for students. Teaching intensity refers to measures that would go beyond just counting contact hours to give a more rounded picture of the nature and amount of teaching received by students.

Q13 On balance, are you in favour of introducing a measure of teaching intensity in the TEF, and what might be the positive impacts or unintended consequences of implementing a measure of teaching intensity?

Q14 What forms of contact and learning (e.g. lectures, seminars, work based learning) should and should not be included in a measure of teaching intensity?

Q15 What method(s)/option(s) do you think are best to measure teaching intensity? Please state if there are any options that you strongly oppose and suggest any alternative options.

Response to Q13	Total	Percent
Yes – strongly agree	5	3%
Yes – agree	23	12%
Neither agree nor disagree	18	9%
No – disagree	35	18%
No – strongly disagree	114	58%

Consultation findings

A large majority (76%) of respondents did not support introducing a measure of teaching intensity in the TEF. This general opposition was consistent in responses to all three questions. Respondents commented that teaching intensity does not directly measure teaching excellence because quantity does not always equal quality. They also felt that a measure at subject-level (rather than course level) would not be meaningful to students because teaching intensity varies considerably between courses and modules. They were also concerned that it might discourage innovation in teaching if the measure only captures ‘traditional’ forms of teaching. It might also encourage providers to ‘game’ the system by offering teaching methods that are easiest to measure. The burden of collecting the data was also felt to be disproportionate, particularly as not all providers have systems in place for capturing this type of data.

“The introduction of any teaching intensity measure risks undermining institutional and academic autonomy to choose the correct pedagogical approach for their

unique mix of subject and student cohort. It would lead to homogenisation across the sector, stifle innovation and damage student success.” **Universities UK**

“Variety in teaching is beneficial for the sector and students, and should not be penalised through implementing a measure that will inevitably favour some types of provision over others. We are also concerned that the cost of this exercise would greatly outweigh the benefits to the student and would redirect the money that could otherwise be spent on improving teaching quality.” **University of Essex**

In terms of the forms of contact and learning that a measure of teaching intensity would need to cover, respondents suggested a range of approaches would need to be captured by the measure, including class based learning, tutorials, practical learning (eg lab sessions), work-based learning, online learning and independent learning. There was concern that a single measure of teaching intensity would not be able to capture this range of teaching approaches, especially in relation to online learning, distance learning and industry-based models.

There was no strong or consistent support for any of the 6 teaching intensity measures proposed in question 15 of the consultation. A common response to this question was that none of the proposed options were supported and most respondents focused on their concerns with each option.

Option 1 (the gross teaching quotient (GTQ); external visits and work-based learning; and online teaching) was seen to be too administratively burdensome for providers and there were concerns that the statistical nature of the measure would not be meaningful to students.

Option 2 (the student survey on contact hours) was not supported because respondents felt that students’ perceptions of the amount of teaching they received were unlikely to provide a robust measure and poor response rates to student surveys could be an issue.

Option 3 (the GTQ weighted by qualification/seniority of teacher) was the most strongly opposed option, with the main concern being that staff seniority would not be a good proxy for teaching quality.

“We also do not consider ‘qualified to teach’ to be an effective method of assessing teaching intensity. This is because we believe this is a loaded term and doesn’t necessarily indicate teaching quality. Many of our providers recruit teachers from their chosen profession - which students value more highly than whether or not they have a formal qualification. It also undervalues younger or more junior staff.” **GuildHE**

Option 4 (quantitative and qualitative information about how a student is expected to spend their time on a course) received the most favourable response. There was still only limited support for this option though, with respondents suggesting it as the ‘least worst’.

Some commented that this information might be useful to students to help them understand what to expect from their course. However, others raised concerns about the quality and accuracy of this data, reflecting on the challenges when it was reported as part of the Key Information Set (KIS), with some suggesting it was poorly understood and rarely used by students when it was part of KIS.

Option 5 (engagement with teaching resources) had support from some students, but, overall, the concern was that this type of data was difficult to collect and might be intrusive to students, as it would likely include tracking the movements and activities of individual students.

Option 6 (staff contracted teaching hours) was seen as difficult to measure in a consistent or accurate way and concerns were raised that it would not take account of class size, online and other external teaching.

Although most stakeholders did not support having a teaching intensity measure within TEF, a number of respondents did support providing information about teaching intensity directly to students outside of the TEF through alternative platforms. Most respondents thought that the information would be useful to students when making choices but TEF was not the platform for providing this information. This sentiment was shared by students, who commented that they want to see information about contact hours, but doing so through TEF ratings was not necessarily the best approach.

A common alternative suggestion to measuring teaching intensity in the TEF was that information on contact hours (including independent study, project work etc) should be published, for example, on Unistats.

“This type of information is probably best provided to stakeholders at the individual course level (as part of the Unistats return) and provided to applicants as part of the standard course information.” **Liverpool John Moores University**

Government response

Through the consultation, pilot and student research, we have been able to test whether subject-level TEF offers a good mechanism to capture information about teaching intensity and therefore inform students' decisions about what and where to study.

Evidence shows that teaching intensity matters to students when they are assessing whether their higher education degree is value for money. As set out in the consultation, the Higher Education Policy Institute (HEPI) found that contact hours impacts on

students' perceptions of their studies.¹⁴ A more recent report commissioned by OfS¹⁵ also found that students see contact hours as one of the factors that demonstrates that a provider offers good value for money. Due to the nature of different subjects, we would expect contact hours and the intensity of teaching to vary by subject.

Given the importance of this issue and its subject specific nature, the Government consulted on whether to introduce a new measure of teaching intensity as part of subject-level TEF, and tested the feasibility of measuring and using this in the first year of the subject-level pilots. This went beyond just counting contact hours to give a more rounded picture of the nature and amount of teaching received by students.

Alongside the responses to the consultation, we have carefully considered the evidence from the pilot and the student research. Measuring teaching intensity in the TEF was strongly opposed in the consultation by a majority of stakeholders across the sector, including students. Findings from the pilot and student research suggest that introducing a measure of teaching intensity in the TEF may not be an effective way forward on this issue.

The feasibility of two teaching intensity measures was tested in the first pilot across five subjects. These were Option 1 – GTQ; external visits and work-based learning; and online teaching – and Option 2 – a student survey. All five subject panels that used teaching intensity measures in the pilot reported that they were not able to use these measures in any meaningful way to inform their judgements in the assessment process. This suggests that teaching intensity measures did not play a role in deciding a subject's final TEF rating. For pilot providers, the cost of the data collection requirements for the GTQ measure were also found to be disproportionately high.¹⁶

The findings from the student research also suggest that teaching intensity factors are of lower relative importance to students when compared to other factors captured within the TEF such as employability, having inspiring teachers and access to learning resources. In terms of their relative importance, contact hours was ranked 17th and class sizes was ranked 19th out of 20 factors.

These findings suggest that introducing a measure of teaching intensity in the TEF would not be an effective way to capture teaching intensity. It would not help the assessment panel identify excellent teaching or influence a provider's rating. A different mechanism

¹⁴ 'Student Academic Experience Survey', June 2017, Higher Education Policy Institute and the (former) Higher Education Academy, available online at: <http://www.hepi.ac.uk/wp-content/uploads/2017/06/2017-Student-Academic-Experience-Survey-Final-Report.pdf>

¹⁵ 'Value for money: the student perspective', February 2018, Research commissioned by the Office for Students, Project led by a consortium of Students' Unions, available online at: <https://studentsunionresearch.files.wordpress.com/2018/03/value-for-money-the-student-perspective-2.pdf>

¹⁶ Full details of the pilot costing exercise are included in their report of the findings from the pilot, published by the OfS. Please see related links section.

will therefore be needed to help students understand the teaching intensity they can expect and consider this when making decisions about what and where to study.

Given this, we think the best approach is for teaching intensity to be taken forward by the OfS outside of the TEF. The OfS will explore how students should be provided with more direct information about the amount and different forms of teaching they can expect from their chosen course. They are already engaging with their student panel to identify what type of information would make a positive difference to applicants and in what format students want to see this information. They will also explore how providers currently meet existing consumer law obligations to provide course information to prospective students and whether this could be improved.¹⁷

Question 16: Other comments on subject-level TEF

Do you have any other comments on the design of subject-level TEF that are not captured in your response to the preceding questions in this consultation?

Consultation findings and Government response

There were a wide range of comments submitted in response to this question. Where appropriate, we have considered responses as part of other questions. The responses described here cover a range of subjects that stand alone from the other consultation themes.

International understanding of TEF

A number of respondents were concerned about the perception of TEF and its rating system internationally.

We recognise the importance of the international market to the UK higher education sector and are working with the British Council, Universities UK international and other partner bodies to ensure that information is available about TEF that can be used to promote better awareness and understanding of TEF amongst international students, funding bodies and other stakeholders.

Meaningfulness to students

Some respondents expressed concern that the TEF does not measure the things that matter most to students.

¹⁷ For information about these obligations, see 'UK higher education providers – advice on consumer protection law', Competition and Markets Authority, 12 March 2015, available online at <https://www.gov.uk/government/publications/higher-education-consumer-law-advice-for-providers>

The IFF student research for DfE¹⁸ indicates that this is not the case. It reported that around three quarters of all applicants reported that they would find subject-level TEF awards useful (alongside provider-level awards). Out of a range of 20 factors that applicants and students were asked to rank in importance, the two most important factors for both applicants and students were the likelihood of securing a graduate job, and potential exposure to employers, industry and workplaces. ‘Inspiring and engaging staff’ was the third most important factor for applicants and the fourth most important for students.

Guidance

Some respondents noted that good guidance should be provided to make the process easier for providers to understand and to ensure consistency in the provider submission across the sector. Several requested that DfE or OfS produce a submissions template.

We note these concerns. We want to ensure that the TEF reflects the diversity of the sector. Therefore, the purpose of the provider submission is to allow each provider to describe their particular mission and the context in which they operate, including any supportive data. While guidance might help to improve the quality of submissions, it risks creating an standardised approach to submission writing that suppresses innovation and leaves less room to describe a provider’s particular approach. We will keep under review the need for guidance as the pilot continues.

Pace of implementation

Some respondents considered that the policy is being implemented too fast and without enough consultation with the sector.

“The timelines for the implementation of the Subject-Level TEF do not appear to leave much time for evaluation and reflection; particularly given that it will also have to respond to the recommendations of the Independent Review of the TEF and the findings of the second year of subject pilots in 2019, a year before it is rolled out as a registration condition for providers in England in 2020.” **National Union of Students and three other student unions**

Responding to concerns raised during the passage of the Higher Education and Research Act 2017, the Government has build in a number of review points, including technical consultations (2016 and 2018), and a ‘Lessons Learned’ exercise (2017), as well as process evaluations. An independent review of the TEF will take place in Academic Year 2018/19. We anticipate that the recommendations of the independent review will influence the development of subject-level TEF before it is fully implemented.

¹⁸ ‘TEF and informing student choice: subject-level classifications, and teaching quality and student outcome factors’, Department for Education, 21 June 2018, available online at: <https://www.gov.uk/government/publications/teaching-excellence-framework-and-informing-student-choice>

Devolved Administrations

Several respondents raised specific issues about institutions in the devolved administrations. They suggested that the TEF should, as far as possible, take account of the HE systems in both England and the devolved administrations of the UK.

“We would strongly recommend that, given the systematic differences between Scottish and English higher education provision, that as much contextualisation as possible is built in to the structure of the subject-level Teaching Excellence Framework, and it should not be seen as a one-size-fits-all approach.” **Glasgow Caledonian University**

While the TEF will become a condition of registration with the OfS for most English providers except the smallest, all providers can opt in to be part of TEF, including those located in devolved administrations with agreement from their relevant government authority. Several providers in Scotland and Wales have already chosen to participate in TEF. While there are no providers in Northern Ireland currently opting in, we will continue to provide the opportunity for all UK providers to participate, subject to agreement from their relevant government authority.

We believe that the TEF is flexible enough to encompass all providers. The arrangements for taking account of the particular context of institutions in Scotland, Wales and Northern Ireland are set out in the [TEF Specification](#). In addition, assessors and panellists for the TEF include representatives from the devolved administrations.

Innovation

Responses included concerns that TEF might stifle innovation and homogenise teaching practices across institutions, as well as those who felt that it promoted innovation.

Innovation in a diverse sector is important and should be supported. We believe that the TEF allows for innovation and institutional autonomy. TEF is not prescriptive but aims to shine a light on excellent teaching wherever it is found. We encourage providers to give whatever evidence supports their case for excellence. The panels have subject-level experts who are well placed to identify and acknowledge where innovation is occurring in provision.

Next steps

This response to the subject-level TEF consultation was published on 22 October 2018.

As outlined under the related links section, this response is one of several documents that have been published about the development of subject-level TEF. The OfS have also published their guidance for the second year of subject-level pilots, which sets out the design and operation of the pilot in detail. The pilot will involve 50 providers.

The second year of pilots will run concurrently with the statutory independent review of the TEF. The independent reviewer will be appointed before the end of 2018 and we expect them to report in 2019.

The final design of subject-level TEF that is taken through to full implementation from Academic Year 2019/20 will be subject to the findings of the second pilot, as well as the outcomes of the independent review.

Annex A: Formal responses to the consultation

The consultation opened on 12 March 2018 and closed on 21 May 2018. A total number of 223 responses were received: 216 by the deadline of 21 May 2018 and 7 late responses accepted and received by 1 June 2018. Table 1 shows the breakdown of responses by type.¹⁹

Table 1: Breakdown of responses received by type

Type of respondent	Responses	
	No.	%
Academic	12	5
Alternative Higher Education Provider (No Designated Courses)	1	0
Alternative Higher Education Provider (With Designated Courses)	4	2
Body Representing Students In Higher Education	18	8
Central/Local Government, Agency Or Body	2	1
Charity Or Social Enterprise	7	3
Further Education College	10	4
Individual (Non-Student)	2	1
Other (Please State)	20	9
Prospective Student	1	0
Publically Funded Higher Education Provider	103	46
Representative Organisation, Business, Or Trade Body	39	17
Student In Higher Education	3	1
Trade Union Or Staff Enterprise	1	0
Total	223	100

A list of all of the respondents to the consultation is provided below. This excludes respondents who marked their response as confidential.

Aberystwyth Students' Union	Association for the Study of Welsh Language and Literature
Aberystwyth University	Association of Colleges
AdvanceHE	Association of Law Teachers (ALT)
Alan Watson, Academic at University of Birmingham	Aston Students' Union
Andy Gravell, Academic	Aston University
Anglia Ruskin University	Averil Macdonald, Academic at Southampton University
Arnaud Chevalier, Academic at Royal Holloway, University of London	Bath Spa University
Askham Bryan College	Birkbeck, University of London
	Birmingham City University

¹⁹ Based on self-selection by respondents when they submitted their response.

Bishop Grosseteste University
 Bournemouth University
 Brit College
 British Academy of Management
 British Pharmacological Society, the
 Pharmacy Schools Council and the
 British Toxicology Society.
 Brookes Union
 Brunel University London
 Cambridge University Students' Union
 Canterbury Christ Church University
 Cardiff University
 Careerssoft
 Chartered Institute of Architectural
 Technologists
 Chartered Management Institute
 CHOBE
 City, University of London
 Construction & Built Environment
 Education Advisory Committee
 Council of Deans of Health
 Council of Heads of Built Environment
 Education Executive
 Coventry University
 Coventry University Students' Union
 Creative Industries Federation
 Creative Skillset
 David Colquhoun, Professor of
 Pharmacology at UCL
 De Montfort University
 Derby College
 Edge Hill University
 EEF
 Ellen Cottis
 English Association (HE Committee) and
 University English
 Finn Jarvis
 General Osteopathic Council
 Gervas Huxley and Mike Peacey,
 Academics at University of Bristol/New
 College of Humanities
 Goldsmiths, University of London
 GTI Media
 GuildHE
 Harper Adams University
 Hartpury College
 Heads of Chemical Engineering UK
 Health and Care Professions Council
 Heriot-Watt University Student Union
 Hertford Regional College
 Higher Education Funding Council for
 Wales
 Imperial College London
 Independent Higher Education
 Institute of Physics
 Institution of Environmental Sciences
 (and the Committee of Heads of
 Environmental Sciences)
 JISC
 Joint Committee for Psychology in Higher
 Education
 Keele University
 Kent Union
 King's College London
 Kingston University
 Lancaster University
 Lauren Marks
 Leeds Beckett University
 Leicester College
 Liverpool Guild of Students
 Liverpool Hope University
 London Mathematical Society
 London South Bank University
 Loughborough University
 Louise O'Boyle, Academic at Ulster
 University
 Manchester Metropolitan University

Manchester Metropolitan University
 Students' Union
 Middlesex University
 MillionPlus
 National Union of Students
 Navitas University Partnerships EU
 NEFG
 Newcastle University
 Newman University
 Nick Holland
 Northumbria Students' Union
 Nottingham Trent University
 Oxford SU
 Paul Ashwin, Academic at Lancaster
 University and Centre for Global Higher
 Education
 Paul Gibbs
 Political Studies Association
 Queen Mary University of London
 Queen Mary University of London
 Students' Union
 Richard Thompson, Academic at Imperial
 College London
 Rose Bruford College of Theatre and
 Performance
 Royal Academy of Engineering
 Royal Central School of Speech and
 Drama
 Royal College of Occupational Therapists
 Royal Economic Society, Conference of
 Heads of Departments of Economics ,
 Economics Network
 Royal Geographical Society
 Royal Historical Society
 Royal Holloway University of London
 Royal Institution of Chartered Surveyors
 Royal Society of Biology
 Royal Society of Chemistry
 Royal Town Planning Institute
 Scottish Funding Council
 Sheffield Hallam University
 SOAS University of London
 Social Policy Association
 Society of Legal Scholars
 Socio-Legal Studies Association
 Solent University
 Solihull College
 St George's, University of London
 Staff and Educational Development
 Association
 Staffordshire University
 Students' Union at Bournemouth
 University (SUBU)
 Teesside University
 The British Academy
 The British Psychological Society
 The British Sociological Association
 The Chartered Association of Business
 Schools
 The Courtauld Institute of Art
 The Geological Society and University
 Geoscience UK
 The London Institute of Banking &
 Finance
 The Open University
 The Pharmacy Schools Council
 The Royal Statistical Society
 The Royal Town Planning Institute
 The Russell Group
 The Society and College of
 Radiographers
 The University of Law (ULaw)
 The University of Lincoln Students' Union
 Thom Brooks, Academic at Durham
 University
 Tyne Coast College
 UCL (University College London)
 Ulster University

Ulster University Students' Union
Universities Scotland
Universities UK
University Alliance
University and College Union
University Archaeology UK
University Centre Reaseheath
University Centre Sparsholt
University of Bedfordshire
University of Birmingham
University of Birmingham Guild of Students
University of Brighton
University of Buckingham
University of Cambridge
University of Central Lancashire
University of Cumbria
University of Derby
University of Dundee
University of East Anglia
University of East Anglia
University of East London
University of Essex
University of Exeter
University of Gloucestershire
University of Greenwich
University of Hertfordshire
University of Huddersfield
University of Kent
University of Leeds
University of Leicester

University of Lincoln
University of Liverpool
University of Manchester
University of Northampton
University of Northumbria at Newcastle
University of Nottingham
University of Plymouth
University of Portsmouth
University of Reading
University of Roehampton
University of Salford
University of Sheffield
University of Southampton
University of St Andrews
University of Suffolk
University of Surrey
University of Sussex
University of the Arts London
University of Wales Trinity Saint David (UWTSD)
University of Warwick
University of Westminster
University of Winchester
University of Wolverhampton
University of Worcester
UWE Bristol
Warwick Students' Union
Which?
Wrexham Glyndwr University
York St John University

Annex B: Consultation events

In addition to the formal written consultation document, during the consultation period we actively engaged with the sector through a series of events and meetings with a range of stakeholders across the sector. In particular, we sought to engage directly with parts of the sector that we expected might be under-represented in the written responses, such as students and further education colleges.

Views expressed at these events were fed into the consultation process and have helped inform the Government response to the consultation.

Students

We held 2 student focused open events attended by students and student representatives, attended a session organised by the OfS for student representatives and met with the QAA Student Advisory Committee. We also held a 1:1 meeting with the National Union of Students. To engage a wider audience of students, we also posted two threads on the Student Room online forum asking students their views on specific issues about PSRB accreditation and teaching intensity.

Providers

We held three open events that were attended by a range of stakeholders, including representative bodies, higher education institutions, alternative providers and further education colleges. We also attended 9 other events and roundtables, including the Advance HE PVC Network (a group of Pro Vice Chancellors and Deputy Vice Chancellors) and events held in both Scotland and Wales, and a dial-in meeting with providers in Northern Ireland. At these events, we presented the key consultation proposals then opened the floor for discussion where we listened to feedback from participants. We also held 1:1 meetings with 6 representative groups where we met with policy officers and chief executives.

Subject bodies

We held 6 roundtable events with different subject groups. Around 30 different subject bodies were represented at these roundtables across the following subject areas:

- Medicine and health
- Social sciences
- Arts and humanities
- Business and law
- Engineering and technology
- Natural sciences.

We also ran a session with the PSRB forum (organised by the QAA and Professions Together), which was attended by a broad range of subject bodies.

Public bodies

We held 1:1 meetings with representatives and leaders of several public bodies to understand the impacts and practicalities of subject-level TEF.

Annex C: Coverage impact of a student cohort threshold

Table 2 shows the estimated impact of introducing a student cohort threshold on coverage of subject-level TEF. A threshold of 10 students is not shown, as it makes very minimal difference to coverage given it is similar to the 10 students required for reportability of TEF metrics. Where possible, the figures in this table have been adjusted to remove out of scope subjects. However, not all types of subjects that would be out of scope could be identified and excluded, meaning the 'overall' figures may still overstate the coverage issue. We also expect the AP figures to improve over time as an increasing number of APs will have 3 complete years of data by the time subject-level TEF is fully implemented.

Table 2: Coverage of subject-level TEF looking at subjects excluded from subject assessment under various student cohort thresholds

	All Providers						Providers with compulsory TEF participation (>500 students)					
	Additional no. of students excluded	Additional % of students excluded	Additional % of subjects excluded	Overall no. of students excluded	Overall % of students excluded	Overall % of subjects excluded	Additional no. of students excluded	Additional % of students excluded	Additional % of subjects excluded	Overall no. of students excluded	Overall % of students excluded	Overall % of subjects excluded
If the requirements for subject assessment were at least 2 reportable metric types and a cohort threshold of 40 students												
All providers	16,000	0.9%	12.8%	53,000	3.0%	28.4%	6,000	0.4%	6.9%	21,000	1.7%	17.0%
FECs	13,000	21.5%	32.0%	29,000	37.7%	62.3%	3,000	6.6%	22.6%	9,000	16.8%	44.3%
APs	^0	1.4%	10.6%	3,000	7.0%	36.4%	^0	0.5%	7.3%	2,000	6.7%	34.1%
HEIs	3,000	0.2%	2.9%	21,000	1.3%	9.9%	2,000	0.1%	2.9%	14,000	1.0%	9.5%
If the requirements for subject assessment were at least 2 reportable metric types and a cohort threshold of 30 students												
All providers	10,000	0.5%	9.1%	47,000	2.6%	24.7%	3,000	0.2%	4.7%	18,000	1.5%	14.8%
FECs	7,000	8.2%	23.3%	23,000	24.4%	53.6%	2,000	3.8%	15.8%	8,000	14.0%	37.5%
APs	^0	0.8%	7.2%	3,000	6.4%	33.0%	^0	0.3%	6.1%	2,000	6.5%	32.9%
HEIs	2,000	0.1%	1.8%	20,000	1.2%	8.8%	1,000	0.0%	1.8%	13,000	0.9%	8.4%
If the requirements for subject assessment were at least 2 reportable metric types and a cohort threshold of 20 students												
All providers	3,000	0.1%	4.2%	40,000	2.2%	19.8%	1,000	0.1%	1.9%	16,000	1.4%	12.0%
FECs	2,000	3.0%	11.4%	18,000	19.2%	41.7%	^0	1.2%	7.3%	6,000	11.4%	29.0%
APs	^0	0.2%	2.0%	3,000	5.8%	27.8%	^0	0.0%	1.2%	2,000	6.2%	28.0%
HEIs	1,000	0.1%	0.5%	19,000	1.2%	7.5%	0	0.0%	0.6%	12,000	0.9%	7.2%

All Providers							Providers with compulsory TEF participation (>500 students)					
Additional no. of students excluded	Additional % of students excluded	Additional % of subjects excluded	Overall no. of students excluded	Overall % of students excluded	Overall % of subjects excluded	Additional no. of students excluded	Additional % of students excluded	Additional % of subjects excluded	Overall no. of students excluded	Overall % of students excluded	Overall % of subjects excluded	
If the requirements for subject assessment were at least 2 reportable metric types and there was no cohort threshold (baseline)												
All providers	n/a	n/a	n/a	37,000	2.1%	15.6%	n/a	n/a	n/a	15,000	1.3%	10.1%
FECs	n/a	n/a	n/a	16,000	16.2%	30.3%	n/a	n/a	n/a	6,000	10.2%	21.7%
APs	n/a	n/a	n/a	3,000	5.6%	25.8%	n/a	n/a	n/a	2,000	6.2%	26.8%
HEIs	n/a	n/a	n/a	18,000	1.1%	7.0%	n/a	n/a	n/a	12,000	0.9%	6.6%

Notes: 'Additional' is compared to the baseline of having no cohort threshold.

^Due to the nature of rounding in the student numbers, the additional number is shown as zero even though the % of students is positive.

Source: Analysis by the Office for Students based on subject-level TEF metrics data for the AY 17-18 TEF assessment process.

Annex D: Glossary

Term	Definition
Additional evidence	Evidence on teaching and learning quality included in the submissions. Additional evidence can be quantitative or qualitative and should address the criteria
Assessment framework	The assessment framework sets out how judgements about excellence will be made. It refers to the aspects of quality, the criteria, the nature of the evidence and how the evidence will be assessed against the criteria to determine the ratings.
Benchmark	The benchmark is a weighted sector average where weightings are based on the characteristics of the students at the provider. A unique benchmark is calculated for each provider, metric and split: it is calculated solely from the data returns informing the metric derivations.
Contextual data	Data on the nature and operating context of a provider, such as their size, location and student population, which is used by panellists and assessors in interpreting performance against the core metrics and additional evidence but does not itself form the basis of any judgement about excellence.
Core metrics	Measures deriving from national surveys and data returns which have been defined, benchmarked and reported as a key part of the evidence used in TEF assessments. For each provider, there are six core metrics, reported separately for the provider's full-time and part-time students, and averaged over three years.
Criteria	Statements against which panellists and assessors will make judgements.
Eligibility	The requirements that must be met in order for providers to be eligible to receive a TEF rating.
Flag	Metrics include flags when the difference between the indicator and the benchmark is significant and material. Flags denote either a positive or a negative difference.

Term	Definition
Higher education provider	A higher education provider (or provider or institution) is an organisation that delivers higher education. A provider can be an awarding body or deliver higher education on behalf of another awarding body. The term encompasses higher education institutions, further education colleges providing higher education and alternative providers.
Indicator	The provider's value for a particular metric, expressed as a proportion, such as the percentage of students that indicated they were satisfied with teaching and learning.
Provisional TEF award	A TEF rating given to a provider that opts into the TEF but who does not have suitable metrics to inform assessment. These providers meet all other eligibility requirements and are prevented from achieving a rating above the first level on procedural grounds.
Splits	Categories by which core metrics are sub-divided in order to show how a provider performs with respect to different student groups and/or in different years.
Statement of findings	A brief, high level written statement that outlines the reason for the rating awarded to a particular provider.
Submission	<p>The submission is prepared and submitted by the provider and used by panellists and assessors to inform their TEF judgement. The additional evidence included in the submission should address the criteria and can be qualitative or quantitative. In subject-level TEF there are two submissions:</p> <p>Subject-level submissions can contain contextual information that explains the performance against metrics and additional evidence to support the case for excellence.</p> <p>Provider-level submissions can contain information on a provider's mission and characteristics, contextual information that explains performance against the metrics and additional evidence to support the case for excellence.</p>

Term	Definition
Suitable metrics	The minimum set of core metrics required to be eligible to make a provider submission and receive a TEF rating of Bronze, Silver or Gold.
Supplementary data	These do not form part of the eligibility requirements for a TEF assessment, but are always displayed when a provider has them.
TEF assessor	TEF assessors consider the evidence available to them and work with panellists to recommend make a provisional judgement about the TEF rating a provider should receive. The provisional outcome is recommended to the TEF Panel. Assessors are experts in teaching and learning or students.
TEF award	A TEF award is made up of the TEF rating (see other definition) and a brief statement of findings. Awards made in academic year 2016/17 ('TEF Year Two') are valid for up to three years.
TEF Panel	The TEF Panel is the decision-making body for TEF assessments. It will be responsible for reviewing the recommendations made by TEF panellists and assessors and deciding the final rating a provider will receive.
TEF ratings	A TEF rating is the level of excellence achieved by a provider under the TEF. There are three possible ratings: Bronze, Silver and Gold.
Very high and very low absolute values	Very high or very low absolute values are defined to be those absolute indicator values that fall within the top or bottom 10 per cent of providers for that metric (in the given mode).



Department
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