INDEPENDENT HIGHER EDUCATION

Independent Higher Education response to the call for views by the Independent Review of TEF

March 2019

Independent Higher Education (IHE) is the UK's representative body for independent providers of higher education, professional training and pathways. Our members are highly student and teaching-focused and include many small and specialist providers. One of IHE's principal aims is to facilitate an SME model of higher education, enabling new approaches and innovation to flourish within a flexible regulatory environment.

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

The Government has stated that the purpose of the TEF is to:

- **better inform students' choices about what and where to study;**
- **raise esteem for teaching;**
- **recognise and reward excellent teaching; and**
- **better meet the needs of employers, business, industry and the professions.**

Yes.

IHE is very supportive of all robust efforts to raise esteem for teaching and to recognise and reward excellence. Our members feel strongly that current information to students, business, industry and the professions is dominated by league tables based largely on an institution's research output. Small, specialist, and industry-led higher education providers focus on teaching and student outcomes, specifically students' success in their particular industry or subject.

Our members put significant effort into ensuring students are well informed about the courses they offer. Most do not appear at all on the main league tables, are excluded from many awards schemes, and struggle to be included in existing public information either because they do not have access to student loans or they are too small to have publishable data. To that end they are very aware of the information sources that are available to students and had hoped that TEF would provide something more consistent and clearer in its design and delivery to better support student choice. Unfortunately, in both its current and proposed design, particularly in relation to the metrics required to reach the Gold, Silver or Bronze awards, TEF is becoming more not less exclusionary.

In developing TEF further, it is important that the pursuit of more information does not become the enemy of the expansion of choice. If it is to succeed in its aims, the design of

TEF must be fit for the purpose of recognising excellence across the whole higher education sector, not just in those institutions where the data offers the easiest assessment. As new providers, SME models and specialisation proliferate across UK higher education, TEF should have as its priority the promotion of choice within an increasingly diverse sector, not the tweaking of a magic formula to generate new rankings and force competition between a limited number of established institutions.

11. These purposes fall into two main areas: providing information and enhancing the provision of higher education.

a. Which of these is the most important (select one option only)?

- **Providing information**
- **Enhancing provision**
- **Both are equally important**
- **Neither are important**

Both are equally important.

b. Please outline below the reasons for your answers

For TEF to enhance provision a number of conditions must be met:

- Prospective students (those interested in attending the specific higher education institution) must be aware of TEF, how the ratings are achieved and trust that the rating is fair;

- TEF ratings must deliver some information about the provider and;

- Higher education providers must feel they can change or improve their rating by enhancing their provision

Where a provider feels their prospective students are not aware of or do not use or trust TEF, the TEF outcome will not be a driver for enhancing provision. If students are aware of the TEF but the rating delivers no information about the provider, for example in the case of TEF Provisional, students will not use TEF to make decisions and TEF will not be a driver for improvement. If the data in TEF is unfair or balanced against a specific type of provider, it will both provide inaccurate information about a provider to students and stakeholders as well as fail to provide incentive for enhancing provision. In this the two purposes of TEF are reliant on the other to be effective. Neither can be more important than the other.

For IHE members TEF currently struggles to meet these conditions. Our members tell us there is no evidence that students are informed or making decisions to study with them based on TEF ratings. From the 2017 cohort of TEF applications, 49 independent providers received a provisional rating (out of 64 provisional ratings) and only 6 received a Gold, Silver or Bronze. In the 2018 cohort 22 independent providers received a provisional rating with only 24 gaining a Gold, Silver or Bronze award. New providers, and those who are new to submitting data will face a similar fate, limited to receiving a

provisional award until the right data can be obtained to make an evaluation. Provisional TEF awards give no information on the provider – despite some of the underlying data being available elsewhere. They do not feature a contextual statement or link to any provider-level information available from other sources. In this, Provisional TEF awards serve neither the information nor enhancement purpose.

Many more IHE members feel they cannot enhance their provision in a way that will impact on the data. This is especially true with providers who are small, where fewer than 10 students can make the difference between being in the top 10% (gaining a positive flag on their data) and being in the bottom 10% (gaining a negative flag on their data). In data this small, the personal circumstances of a student (health, life-events, careers and similar) have a far greater impact on the data than anything the provider can change in the course or programme. For example, if three students at a small contemporary music college are offered recording contracts and leave their programmes early to pursue their music careers this could result in a negative flag on the retention statistic. If the same thing happened at a large institution there would likely be a celebration and a local news story about the students, but their TEF prospects would be unaffected. If providers do not feel that the data accurately reflects their provision or they feel it is inherently unfair, TEF will fail to meet both purposes as they are so strongly linked.

One final issue our members have raised is the impact of the year that a provider enters TEF. Each year of TEF ratings assess providers and group them based on their relativity to the rest of the cohort. Only a small percentage of each cohort can get Gold, a bar which changes every year based on those who enter. Providers without metrics, providers with small data sets who must add together years of data to meet minimum requirements, and providers with limited years of data will all have to submit TEF applications outside of the standard assessment cycle of (currently) three years. For providers with only one year of applicable data (including accumulated data) their submission must be repeated after one year and could result in the two applications, with the same data, receiving different awards depending on the year it was submitted. This is frustrating for providers as there was little they could do to enhance provision enough to meet a bar which is constantly moving. In a perfect cycle all providers would apply every three or similar years. However, the TEF reliance on a threshold for metrics that is unachievable for most independent providers who sought to enter in 2017 and 2018 suggests that the perfect cycle cannot be achieved. The constant addition of new metrics raises this threshold each year. For example, the addition of new data points such as LEO in the core metrics in the current pilots will result in some providers achieving a TEF rating of Gold, Silver or Bronze in one year and then returning to provisional the next because they cannot achieve the LEO metric. Any new metric added to TEF must be important enough to warrant sacrificing both purposes of TEF for those providers it will force back into a Provisional award.

12. Should there be any other purposes for TEF?

The current approach to TEF excludes more independent HE providers than it includes. Until a more accessible process can be found that gives students information on the full range of courses and programmes they can access, TEF should maintain only its current purposes and work to achieving those with some level of success. Any new purpose for

TEF runs the risk of disadvantaging the students studying at institutions which are excluded from the TEF process through no fault of their own.

13. Are the criteria used in TEF (see Figure 1 for a list of the criteria) appropriate?

If not, what criteria would be more appropriate?

The challenge for TEF is that it is seeking to place only one set of awards across a range of criteria that are not only very broad but present students with a range of information, not all of which is important to them. While we agree with many of the criteria which are included in TEF, we believe that some of the criteria should be selected to form 'commendations' which would better support the purposes of TEF. This would also allow for a more appropriate expansion of the TEF criteria, where it can be shaped towards information relevant to students.

The awarding of commendations would give TEF the flexibility it needs to not only meet both its purposes, but also to be more inclusive. The current criteria model requires providers to have data in all 11 criteria which forces many independent providers into Provisional TEF awards as this data is not available. Additional criteria have added additional data, with grade inflation and differential degree attainment by student background being piloted, and LEO data (which continues to be a challenge for smaller and specialist providers) already a 'supplementary' data source. The creation of commendations could allow individual criteria to be assessed separately giving providers without all the data an opportunity to receive awards where merited. Commendations would give information to students on the specific strengths of an institution which can support their decision making. They would encourage providers to enhance provision in specific areas, mitigating the challenges mentioned above by allowing providers to work towards specific criteria.

Our members have expressed concern about the use of employment measures as criteria for TEF. There is insufficient evidence that employment outcomes are a measure of teaching excellence, as they are so heavily influenced by the individual student and industry context. They are also heavily influenced by the way a student answers the question. One member gave the example that a group of students who graduate and become artists might all answer differently if asked what their employment status is. One might say they are unemployed, one working part time in hospitality and one a full-time artist, yet all are taking commissions on their art. This makes the data unreliable and not a good proxy for teaching excellence.

14. There is no direct measurement of teaching quality currently available. As a result, the TEF uses existing data as indirect measures of teaching quality. These measures are known as "proxies".

a. Are the metrics used in TEF the best proxies for measuring the TEF criteria (see Figure 1 for a list of the criteria and metrics)?

No.

b. If you answered no, what metrics would be more suitable proxies?

TEF metrics are constantly expanding, and it is this expansion away from the core metrics looking at teaching excellence that is most concerning for our members. TEF is not and should not be a 'rating everything' framework, it should be an excellence framework. TEF needs to identify only those metrics needed to evaluate teaching excellence to achieve its purposes across a broader range of provision. TEF should prioritise student choice above all, but the addition of more metrics as proxies for criteria will limit those providers included in TEF and thus the choices presented to students through the TEF. The challenge of using metrics for TEF centres on what happens when the metrics are either a) not available yet or b) the student population within the metric is not big enough to be publishable. The more metrics which are included in TEF, the more likely that metrics will be missing from small (/micro) and specialist providers or new providers and therefore continuing to put these providers at a structural disadvantage. The more metrics that are mandatory, the more providers (and subjects) you exclude from the system.

We disagree strongly with the use of grade inflation in TEF in any way. Grade inflation as a metric should only be used by the regulator to protect against the potential motivation for providers to inflate grades to meet regulatory requirements. It should not be used as a proxy for or against excellence.

Specific data from the new Graduate Outcomes survey would provide a better proxy for student outcomes than the recently included LEO metric. Salary is not a proxy for a student's experience in higher education. It is contextual to each student and their choices after they graduate. LEO also fails to reflect variations in salary by region and to accurately evaluate those who are self-employed or working in the gig economy. This disadvantages specialist providers who support specific industries or subjects such as creative design, emerging technology, theology and performing arts. It also discourages providers from developing entrepreneurs as not only are they more likely to leave without a qualification if their business becomes a success, but LEO will not capture their self-assessed earnings in its current model.

Our members are also very concerned about the use of the 'highly skilled' job marker. As our member Norland College put in their TEF written submission:

"the negative flag for 'Highly skilled employment or further study' frustrates the preliminary hypothesis. The UK Standard Occupational Classification (SOC) definitions assign the profession 'nanny' to occupational group 5. Norland is thus excluded a priori from an initial Gold rating by its own mission, which is to produce highly-trained and employable nannies: the more students succeed in achieving the outcome for which they aimed and have trained, the more certain the negative flag and—unless the negative flag is seen in context—a lesser award."

SOC codes do not provide the needed context for the use of high skill and with the ever-changing employment market, are out of date as soon as they are defined. We suggest other markers from the graduate outcomes survey which look at if students find their current work meaningful and important and if they are using what they learned during their studies instead of LEO and in particular SOC definitions.

15. The TEF metrics are benchmarked to account for factors such as the subject of study, prior attainment, ethnicity and educational disadvantage of the provider's student intake (see that 'What is TEF?' section for detail). a. Should the metrics be benchmarked to allow for difference in a provider's student population?

Yes.

b. Does TEF benchmark for the right factors?

No.

Benchmarks are very important for specialist providers where future success for their graduates is contextual to their industry. It is also necessary to support providers to offer opportunities to students from widening participation backgrounds and with different prior academic qualifications. The benchmarks reflect the substantial evidence available that socio-economic and prior academic factors have a significant impact on a student's experience through and after higher education.

Benchmarks need to be developed to reflect the delivery model of the course. Accelerated degrees for example have different continuation metrics at the point of sample because students have gone through two assessment boards instead of one. Blended learning students will approach NSS questions from a different perspective because their learning experiences do not necessarily match what the NSS is trying to assess.

Employment data also needs to be benchmarked by the societal factors impacting employment. We know there is an employment/salary gap for women, BME graduates, graduates with disabilities and those from low-income backgrounds. Institutions which support these students through higher education should be rewarded for the contribution they are making to narrowing that gap, not be penalised for their widening participation activity. They cannot be held responsible for societal prejudice, however much higher education has a role in righting those wrongs.

16. The TEF process uses both quantitative evidence (for example, the core metrics) and qualitative evidence (for example, the written submission).

a. What are your views about the balance of quantitative and qualitative evidence considered in arriving at ratings?

There is a challenge with the way impact is viewed within the qualitative submission of TEF. Smaller providers are more likely to have a large impact on fewer students, but panels respond more positively to submissions which show impact across a greater number of students. In this way the qualitative submission disadvantages providers as much as the quantitative. Panels (and guidance to providers and panels) need to approach micro provider submissions with a more open mindset. This could be achieved through better guidance and through a set of common questions for smaller providers which support the drafting of the submission.

b. Are there any other aspects of the process that you wish to comment on?

The focus on metrics as the primary determinant of ratings disrupts the balance between quantitative and qualitative evidence submissions. Where the data is easily understood and positive, providers can use their submissions to build a more impressive and informative institutional narrative. However, where the data is difficult to understand because of a unique delivery model, specialist subject, small institutional size or widening participation mission, the provider must spend most of their institutional submission explaining their metrics and very little on putting forward a positive image of their institution. This doubly disadvantages those providers who are seeking to expand student choice and be innovative in their delivery.

For example, a small specialist music college offering accelerated degrees and a foundation programme to support widening participation students will spend most of their submission explaining how the continuation metrics do not reflect the additional exam boards students have completed compared to the three year benchmarks, how the nature of the music industry's gig economy employment impacts student outcomes and how their widening participation mission impacts data across the criteria. This leaves little time to discuss their excellent links with industry, exceptional and state of the art facilities and world leading industry teaching staff. Special provision for additional pages for these providers who face a lot of challenges with the metrics would be a useful way to ensure that everyone has equal opportunity both to address the metrics and to champion their good practice.

TEF should lose the current flag system for very high and very low absolute values, as it provides little of value to the panel and significantly disadvantages smaller providers for which the flag can represent fewer than 10 students. The flag system also disadvantages specialist providers, where often negative absolute flags overshadow the fact that the benchmarks show them excelling in their subject area or with the widening participation students they have admitted. When a provider can do little to impact a negative flag, TEF ceases to be a motivating factor for enhancing provision. When flags are so sensitive to subject or size, they serve only to misinform prospective students and stakeholders. In these ways, absolute value flags undermine the dual purpose of TEF.

17. Are the purpose(s) of TEF met by:

a. awarding a single rating?

b. with three levels of differentiation, plus a fourth rating for those unable to be assessed?

c. ratings named Gold, Silver, Bronze and Provisional?

Please explain your answers.

No.

TEF awards should reflect the diversity of higher education, support student choice and encourage innovation. To do this they must look beyond Gold, Silver, Bronze and

Provisional and provide more depth to students. We do not support a system with four levels where everyone races to level 4, as that doesn't give students any further information. We would welcome a system which allows providers to celebrate and have assessed what they do best within each level to encourage students to choose education which is right for them, which is why we have recommended a system of commendations which highlight where providers show excellence in specific missions.

Provisional TEF should only be for new providers who have not yet had time to accumulate the data. We need to move to a model where providers are not stuck in provisional TEF forever because of the mismatch between data and the size of the student body. Members who are have been awarded Provisional feel that students do not have enough knowledge about the Provisional award and therefore students react negatively towards to blank spaces in Unistats, not recognising it as data missing, but as a negative reflection of the provider.

TEF also fails to meet its purpose by a rating system which changes the bar each year of application. If TEF awards have a duration of more than one year, which we agree they should be, then the rationings should be a clear and consistent bar which providers can work to achieve. A system where providers can achieve Gold in one cohort and Bronze in another is not useful or transparent to students or stakeholders.

18. If you answered no, what alternatives you would suggest:

   a. **For provider-level TEF?**
   b. **For subject-level TEF?**
   c. **If your previous response(s) reflected on the impact of the TEF on the international reputation of institutions and/or the UK as a whole, we would welcome any evidence or information you can provide that might support your view or help inform the independent review.**

We would support a commendation approach in which everyone must meet the baseline requirements and then focus is given to particular areas of excellence through commendations. This would prevent the moving goal posts which have occurred every time TEF is changed (such as TEF 2 to TEF3 which were not comparable) and provide more information to students on aspects of teaching and learning excellence which matter to them. Commendations which are awarded for activity which supports harder-to-reach applicant groups, part-time students, specialist and industry provision, disabled students, equality and diversity could be welcomed into the TEF models. This would help to level the playing field for different types of provider, would offer motivation for the enhancement of provision for these students, and would deliver more information to these students on which providers demonstrate excellence in the areas which are most relevant to them.

19. Has the introduction of TEF positively changed the educational experience of students (e.g. teaching and learning)?

If yes, how?

For most of our members it is too soon to draw a conclusion on whether TEF has impacted positively on the educational experiences of students. Our members have long had a focus on delivering innovative and student-focused approaches to teaching, in contrast to some of the larger established institutions which have traditionally focused on research, and it is therefore hard to discern whether or not TEF is contributing to teaching excellence in these small, micro or single-subject providers.

As outlined above, where providers feel that structural issues limit their ability to influence the metrics sufficiently to have a material impact on their rating, TEF is unlikely to make any positive difference on the experience of their students.

20. Has the introduction of TEF negatively changed the educational experience of students (e.g. teaching and learning)?

If yes, how?

Only a minority of independent providers have yet received a TEF rating. There is a risk that TEF could drive homogeneity within the sector by incentivising SME providers to grow beyond their natural size in order to hit the metrics thresholds. While TEF remains heavily data driven it will continue to exclude the specialist SME (and micro) providers, restricting the apparent choices of students, discouraging diversity in the sector and potentially diluting the distinctiveness of providers if attaining TEF ratings grows in importance relative to their own missions.

23. Does TEF help you as a student/student union/provider/employer/other? Please explain the reasons for your answer.

IHE is the representative body for a group of providers who focus more on teaching than research, so TEF is helpful to the extent it raises the profile of teaching and therefore emphasises that our members have significant value within the higher education landscape. It helps us to raise the profile of teaching-focused providers amongst students and in particular employers and other stakeholders.

24. Explaining your reasoning, what are the most significant costs of:

a. Provider-level TEF?

There are two major costs related to provider-level TEF. Currently most significant is the cost of the resource required to complete the written submission. However, as the data develops this may be eclipsed by the cost of achieving the metrics required to participate. There is a growing cost to the Graduate Outcomes survey, now that this has been centralised. From next year our members will be paying an as-yet-unknown cost to HESA

for submission of regulatory data, NSS and Graduate Outcomes and this will be coupled with significant resource internally to collect and manage the data. Our members have never received public funding, and as such have not enjoyed the levels of resource to purchase data systems or develop significant capacity in student data. Most use very simple processes for data collection and do not yet have the resource for data evaluation. Many will see their data for TEF summarised and analysed for the first time in the TEF data portal. Systems are now being purchased, many of which cost over £200,000, by providers with less than 1000 students. Capacity is difficult to build, which has resulted in many providers buying in resource to manage the data analysis. These costs are difficult for members to predict and are often underestimated. They are also a significant disadvantage against larger providers who already had capacity and systems in this area prior to TEF.

Some of our members are single subject providers and so the cost of TEF is the same across both provider level and subject level TEF. Our members are often SME or micro providers with limited resource and staffing to conduct the written submission and the data analysis of the metrics. Any member of staff working on TEF, who will often be the only person in the organisation with a role related to planning and data, has to suspend business as usual in order to complete the submission. It must be recognised that there is often not the time or particular skill-sets within these providers to write a comparable submission to larger and better resourced providers, and yet a compelling submission is all the more needed if the provider has little or no usable data, which has hitherto often been the case.

b. Subject-level TEF?

For our members who are still small but multi-disciplinary, subject-level TEF carries additional costs due to the additional layers of work required but in many cases these providers have little additional resource to draw on in their administrative teams. This is also true for teaching staff in SME providers who may have additional duties such as recruitment or outreach, or may be active industry professionals, alongside their teaching duties. We have raised this issue of additional burden before, which disproportionally affects smaller providers.

The coding of subjects is often too broad, particularly for our members teaching for the creative industries. Whilst 'creative arts and design' covers a broad range of very different subjects and professions, it offers a single code in which to categorise courses. Putting ballet, sculpture and visual effects in the same basket does not enable a meaningful comparison of like with like, making this detrimental to the 'provision of information' aim of the TEF and of particular regret when the UK's creative industries are experiencing rapid growth and generating well-paid and internationally portable jobs.

25. Explaining your reasoning, what are the most significant benefits of:

a. Provider-level TEF?

TEF has the potential to inform the public on different, student-focused measures of excellence in higher education and loosening the grip of the research-centric reputational measures which dominate league tables and currently exclude most of our members

from rankings. This opens up the playing field to new and independent providers. When the data is available it allows our members to showcase their innovative and agile approaches to improving teaching, learning and the student journey.

A significant benefit of provider-level versus subject-level TEF is that data is more readily available given the particular challenges of SME providers in meeting publication thresholds. This makes it more inclusive than subject-level TEF across different types and sizes of higher education institution.

b. Subject-level TEF?

Many of our members were initially excited by the prospect of subject-level TEF, and its potential for a fairer comparison of specialist and single-subject providers against their competitor courses at traditional universities. It should offer a more meaningful comparison for students and better support providers wishing to use TEF for enhancement at programme level. It should also enable a fairer assessment of teaching and student outcomes by placing these in the proper context of their subject. With provider-level TEF, large universities can hide poor-performing courses in their overall data, but this is not an option for our members. Subject-level TEF should bring out the strengths and weaknesses of larger universities and give students a clearer picture of the course they intend to study.

26. Are there particular types of students, provision or providers that are disadvantaged by the current design of TEF, in a disproportionate way?

If so, what changes could be made to address this?

Yes.

Many of our members have limited resource to support and engage effectively with TEF, including the preparation of the submission, compared with large multi-faculty institutions. It is often left to one person who works on many areas to deal with. Due to data challenges, these same providers rely heavily on the submission because they have very small, new and in some cases missing data. This creates a perfect storm of challenges which can result in disproportionate disadvantage. The solution to date has been to simply exclude these providers but exclusion is not a solution, it is an acknowledgement of failure, and with growing numbers of new and SME providers entering the regulated higher education sector, the failure will only become more visible.

The disadvantage experienced by SME providers could be mitigated by simplifying TEF, removing the metrics which cause the greatest difficulty and altering the parameters for Provisional TEF to allow commendations where data is available and points to an area of particular strength. Another option would be to create a 'small providers' TEF, rejecting the idea that all TEF awards must be directly comparable and instead offering a different way of recognising excellence in small (and often specialist) providers. Most students choosing a small provider will do so with their eyes open and do not expect every aspect of provision to be directly comparable to a much larger university. There is therefore no reason why a TEF award alone should be expected to force such a comparison between two institutions which are otherwise so obviously different.

Solutions such as these would also help to futureproof TEF. Many of our members offer very new courses focused on future industry needs which often do not fit into a single subject area and their delivery models already cause challenges with metrics systems designed to compare more traditional delivery models. These providers are often the first to innovate as they are the most aware of and responsive to market change. TEF must be more flexible and adaptable in order to remain relevant to the courses and delivery methods of the future. It must not stifle innovation in teaching and delivery or disadvantage specialist providers which are student and industry-led.

The current design of subject-level TEF relies on having even more granular data, which is often not available for small but multi-subject providers or has not been available for long enough to creative a time series and narrative. The more data points which are required to reach a judgement, the more subjects will be excluded from subject-level TEF. If even one data point is missing, because there are not enough students on that course (i.e. fewer than 30), 25% of subjects within providers would be excluded from TEF. That suggests we need a change to the system, not to blindly continue this way and accept that level of loss.

The way in which TFE is run must be fair and appropriate for all providers of higher education. IHE would strongly support a project to review TEF for micro providers (i.e. those with less than 1000 students) with a view to creating a model which works for smaller providers with less data and less resource to participate. The use of commendations should also be explored in terms of how this might support SME and micro providers to participate fully in the exercise.

International student data is omitted from many of the TEF metrics, especially the graduate outcomes and LEO data. Most international students will be unaware of this and could use TEF as a method of choosing their institution, but the data does not represent their unique needs for example in graduate employment.

Grade inflation metrics disadvantage providers without their own degree awarding powers who must therefore collaborate with another institution, because they do not have the power to modify degree algorithms.

Members have also raised concerns with the classifications used in graduate data of 'highly skilled jobs'. By the very nature of some of the courses delivered by our members, their graduates do not fall into the 'highly skilled' graduate categories, whereas these providers know that their students are highly skilled with extensive an industry-specific knowledge from their degree. SOC codes by their very nature do not reflect the changing nature of employment in the UK, and disadvantage providers who are pioneers in their industry. We give the example of Norland College above, whose graduates are highly paid and sought-after childcare professionals, but because of the standard occupational classification of nannies remain flagged by the metrics as in low-skilled employment.

Providers with high numbers of international students, EU students or very mobile UK students are disadvantaged by the metrics for graduate outcomes, in particular the LEO outcome. We would suggest adding a salary question to the graduate outcomes survey for students who are not working in the UK. This could be asked in a way to allow it to be a proxy for LEO data for institutions with higher numbers of international students, EU or very mobile UK students.

27. Are there particular types of students, provision or providers that are advantaged by the current design of TEF, in a disproportionate way?

Yes.

If so, what changes could be made to address this?

The current TEF model significantly advantages large multi-subject providers where the data is widely available and they have several years of experience to draw on in understanding and shaping the metrics involved. In these large institutions, both the provider-level and subject-level TEF models allow the success of some courses to hide the failure of others. While the opposite can also be true, the general 'averaging effect' of large numbers smooths out the impact of isolated problems and provides large institutions with an advantage against small and single-subject providers who are uniquely exposed to even small-scale or time-bound issues being picked up in the data.

TEF also advantages those providers who are selective or recruit largely from higher socio-economic backgrounds or those students with better prior attainment. These providers are less likely to need significant support structures including financial to ensure student continuation and success. They are also at a significant advantage when it comes to graduate outcomes as these students are not disadvantaged by the inequities of the current UK labour market.

TEF advantages undergraduate and domestic students as the main metrics are based on data involving primarily these students. This gives them an advantage in the information provided which is disproportionate to postgraduate and international students.