

# Teaching Excellence and Student Outcomes Framework: subject-level

Response from the Higher Education Funding  
Council for Wales, May 2018

This is a response to the subject TEF consultation at:

<https://consult.education.gov.uk/higher-education-reform/teaching-excellence-and-student-outcomes-framework/>



Noddir gan  
**Lywodraeth Cymru**  
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## Introduction

1. The Higher Education Funding Council for Wales wishes to develop and sustain internationally excellent higher education in Wales, for the benefit of individuals, society and the economy, in Wales and more widely.
2. We regulate fee levels at HE providers, ensure a framework is in place for assessing the quality of higher education and scrutinise the performance of universities and other designated providers.
3. We use resources from the Welsh Government and others to secure higher education (HE) learning and research of the highest quality and make the most of the contribution of HE to Wales's culture, society and economy and ensure high quality, accredited teacher training.
4. We welcome the opportunity to respond to this consultation and are pleased to be able to comment based on our experience as a regulator of higher education in Wales under the Higher Education (Wales) Act 2015.
5. We would encourage the Department for Education to consider how its proposals will impact on UK-wide issues such as the co-regulation of quality assurance.
6. We would encourage the Department for Education to take care to ensure that its implementation of these proposals does not have an adverse impact on the reputation of UK higher education as a whole.

## Our response

Question 1: 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?  
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?

7. We would encourage DfE to adopt a system which ensures comparability of standards across the UK.

Question 2: Do you agree that we should have a longer duration and re-application period in subject-level TEF?

8. We consider that any proposed changes to award duration should ensure that the validity of current awards at provider level are not affected. We would welcome clarity as to whether providers which have TEF awards currently would be required to undergo an assessment at subject level prior to the ending of their current award, if subject TEF goes ahead. We would encourage DfE to ensure that its proposals fully mitigate any potential risks to the reputation of UK higher education from an international perspective in

relation to existing provider level TEF awards, including in recognising that participation in TEF is not compulsory in Wales and the other Devolved Administrations and that external quality reviews will continue.

Question 3: 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)?

9. We do not wish to comment.

Question 4: For the design of subject-level TEF, should the Government adopt:

a) a 'by exception' approach (i.e. a form of Model A), or

b) a 'bottom up' approach (i.e. a form of Model B), or

c) an alternative approach (please specify)?

10. We do not wish to comment.

Question 5: 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?

11. We do not wish to comment.

Question 6: In Model A, should the subject ratings influence the provider rating?

12. We do not wish to comment.

Question 7: In Model B, do you agree with the method for how the subject ratings inform the provider-level rating?

13. We do not wish to comment.

Question 8: Do you agree that grade inflation should only apply in the provider-level metrics?

14. We recognise that there is scope to explore ways to set and maintain sector standards, however, we consider that this work is best left to the sector. We consider that the introduction of any GPA system would have its own disadvantages, including in terms of the potential for use of differing sets of algorithms. We would therefore encourage DfE to await the outcomes of the UK-wide projects in this area.

Question 9: What are your views on how we are approaching potential differences in the distribution of subject ratings?

15. We do not wish to comment.

Question 10: To address the issue of non-reportable metrics:

a) do you agree with the proposed approach?

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)?

16. We do not wish to comment.

Question 11: Do you:

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

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

17. We would encourage DfE to maintain a focus on subject benchmark statements and external accreditation.

Question 12: Do you agree with our approach to capturing interdisciplinary provision (in particular, joint and multi-subject combined courses)?

18. We do not wish to comment.

Question 13: 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?

19. We would encourage DfE to re-consider its proposals for the introduction of a measure relating to teaching intensity. We do not consider that this would be a useful measure. Additionally, there could be unintended consequences arising as a result of the use of the outcomes. We consider that the complexity of this information is unlikely to be fully demonstrated as a metric. We consider that contextual information may be required in order for students and the general public to fully understand the data. This also applies to the use of supplementary measures such as the use of Longitudinal Educational Outcomes (LEO) data. We consider that it would be useful to instead encourage institutions to include information on teaching intensity in their TEF submission.

Question 14: 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?

20. We consider that this information would be better located on institutional websites rather than used within the measure.

Question 15: 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

21. We do not wish to comment.

Question 16: 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?

22. We consider that it would be more appropriate to await the outcomes of the independent TEF review and the subject TEF pilot before embarking on a full exercise at subject level.
23. We would encourage DfE to consider how it will mitigate any unintended consequences which arise as a result of its proposals, including any artificial market behaviour which could impact on UK higher education more generally. This includes taking account of the fact that TEF is not a requirement in countries of the UK other than England.
24. We would welcome clarity as to DfE's intentions regarding the publication of subject TEF outcomes.