## Minimums, maximums,

## mice and bears

Understanding proposed changes to the TEF and the judgement of "minimum outcomes"



## Minimums, maximums,

## mice and bears

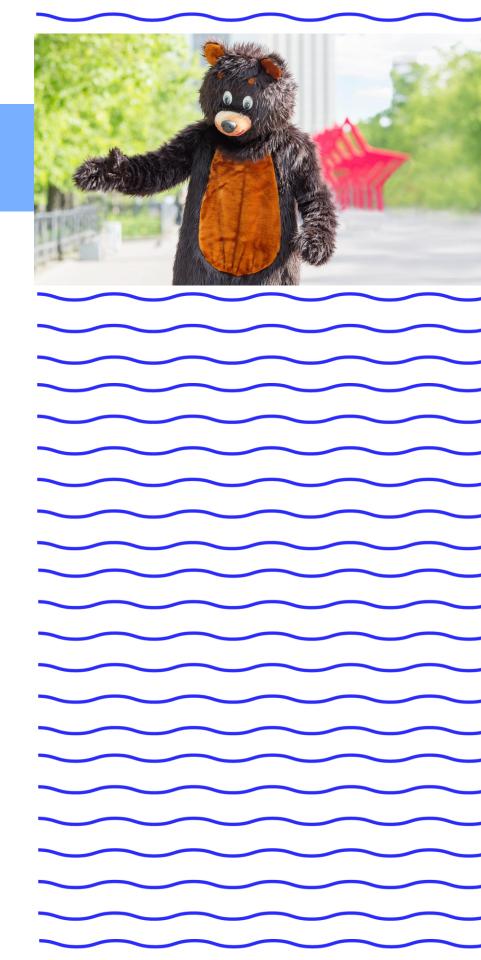
Understanding proposed changes to the TEF and the judgement of "minimum outcomes"



## **Minimums and maximums**

- Two major (sets) of consultations all on one day
- The first concerns the Teaching Excellence Framework (TEF) which in England is compulsory but that Nations providers usually take part in.
- The second concerns B3: Student Outcomes which is England only (but likely to have long term implications on nations)
- Major student voice changes and implications (and opportunities) in TEF





## The TEF

 "We will ensure that universities deliver the best possible value for money to students: we will introduce a framework to recognise universities offering the highest teaching quality; encourage universities to offer more two-year courses; and require more data to be openly available to potential students so that they can make decisions informed by the career paths of past graduates" (p35)



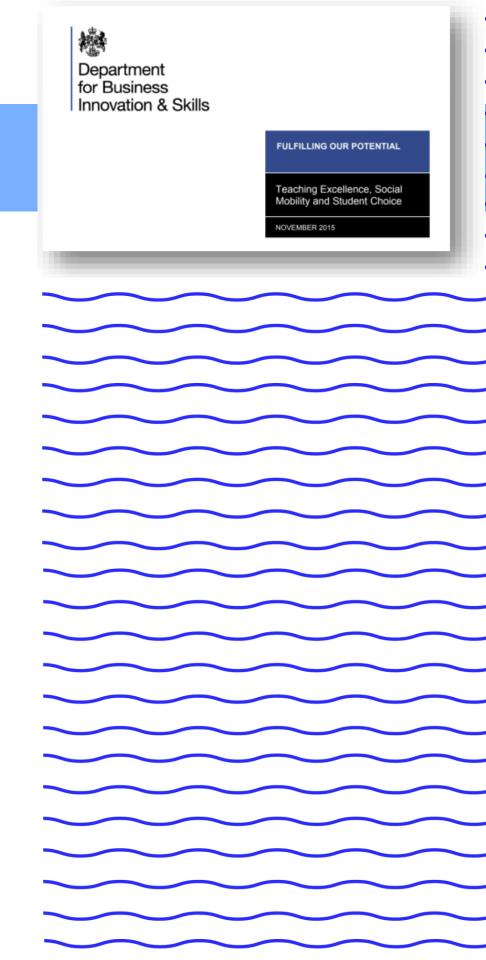
### STRONG LEADERSHIP A CLEAR ECONOMIC PLAN A BRIGHTER, MORE SECURE FUTURE

Conservatives

## The TEF

• "It will identify and incentivise the highest quality teaching to drive up standards in higher education, deliver better quality for students and employers and better value for taxpayers"

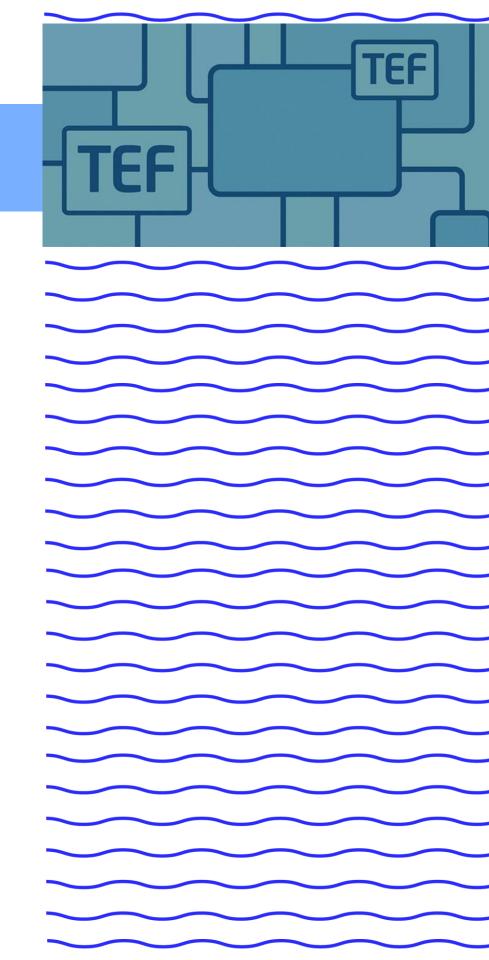




## The TEF

- Taking part is a requirement in England
- It is optional (based on the permission of the Minister) in devolved nations.
- Unregistered English providers can also apply if desired.
- Doing well in it was originally linked to being able to raise fees – which generated major controversy
- (Boycott, and deprioritising of NSS in calculations)





Provider name	Higher education provider	Award year	TEF rating
	University of Abertay Dundee	June 2017	TEF Silver
Award type	Aberystwyth University	June 2018	TEF Gold
Gold 77 Silver 136	Abingdon and Witney College	June 2018	TEF Silver
Bronze 61	ACM Guildford Limited	June 2019	TEF Bronze
Provisional 16	Activate Learning	June 2017	TEF Silver
England 277	AECC University College	June 2017	TEF Silver
Wales 8 Scotland 5	ALRA	June 2019	TEF Silver
	Anglia Ruskin University Higher Education Corporation	June 2017	TEF Silver
	Arden University Limited	June 2019	TEF Provisional
TEE Gold	Arts Educational Schools(Tha)	luno 2010	TEE Cold



### Award ty

Gold	
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Bronze	
Provisional	Î

### Nation

England	
Wales	
Scotland	





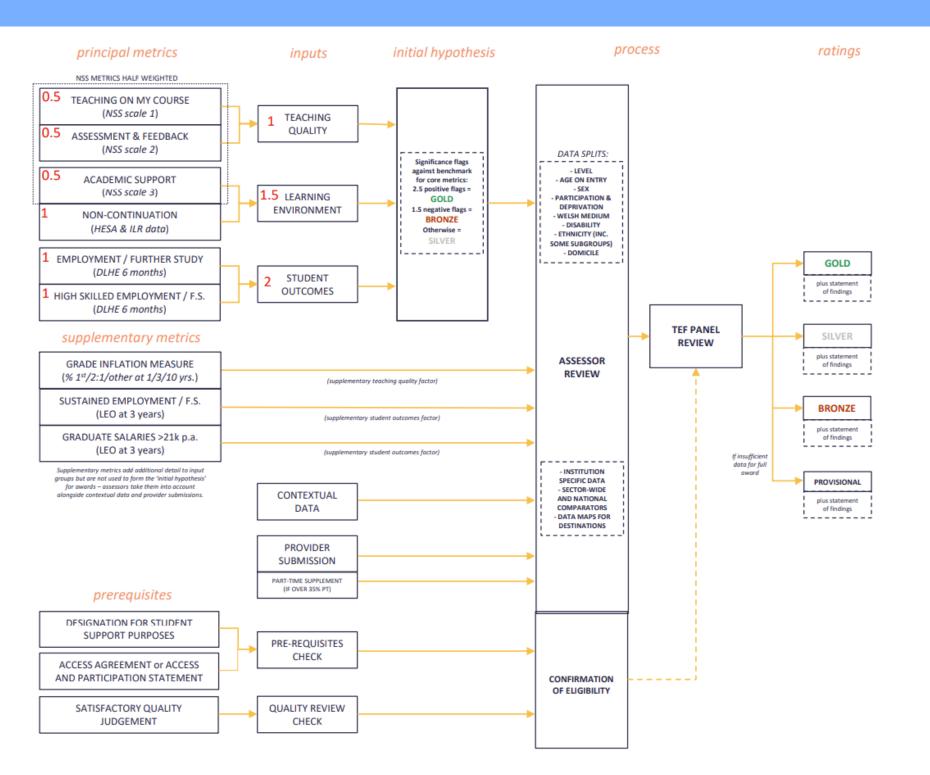


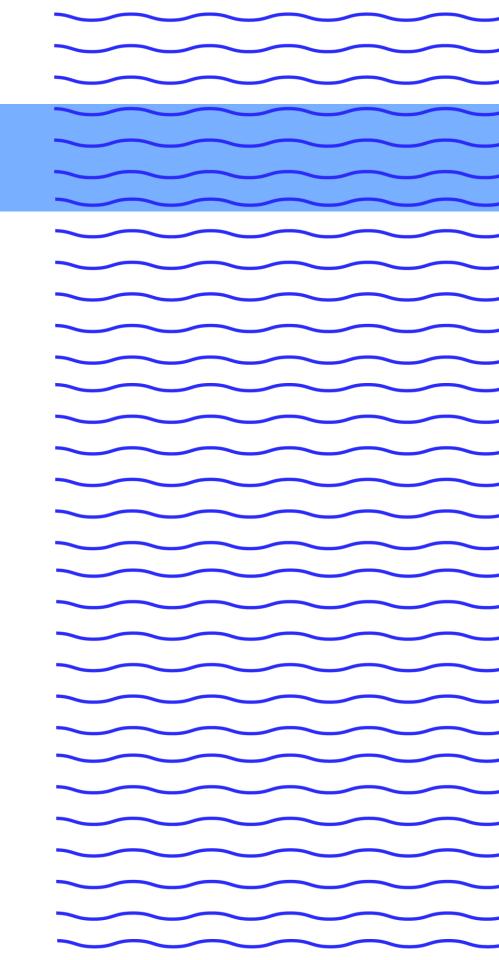


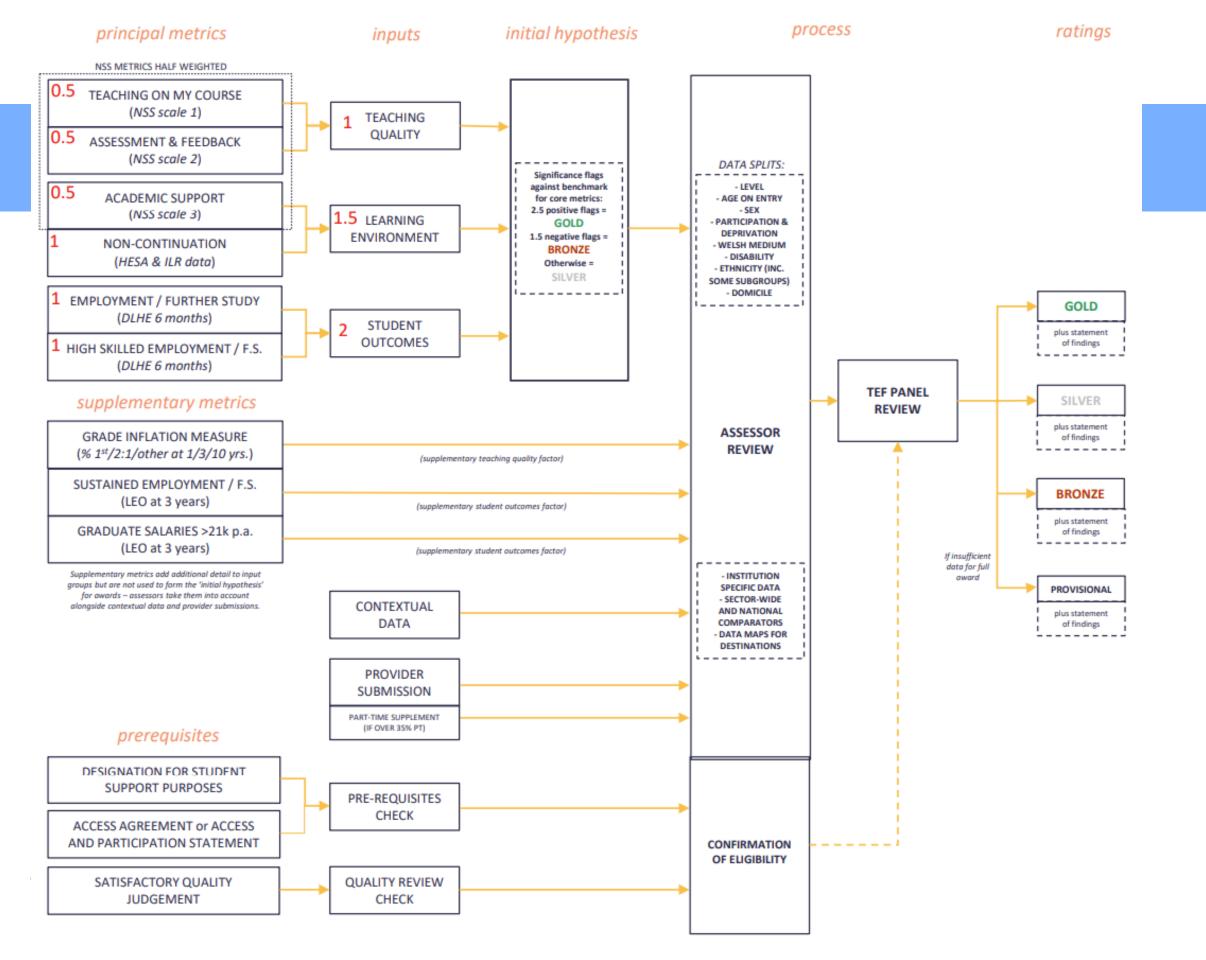


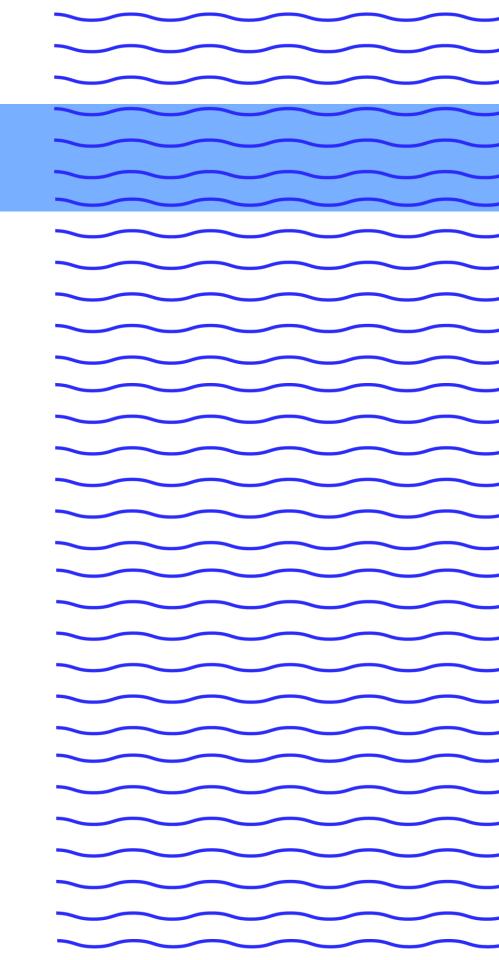


## The machine





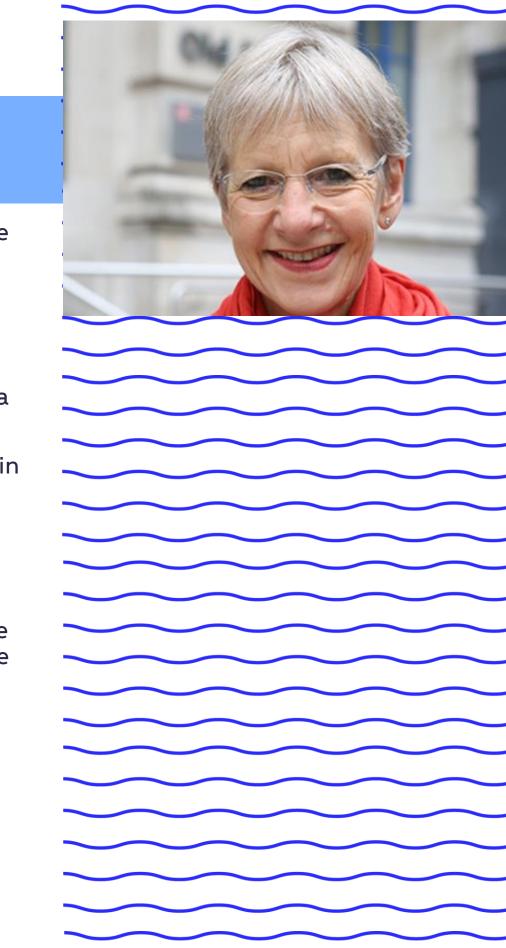




## **Review!**

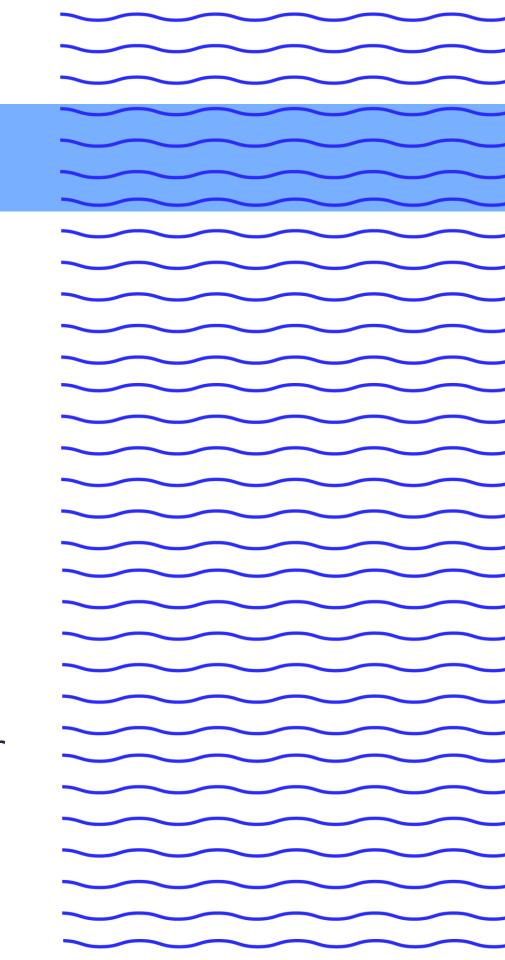
- During the passage of the Higher Education and Research Act 2017 (HERA2017) members of the House of Lords were particularly concerned about the TEF as – effectively – a government mandated ranking.
- There were worries about linking it to fee levels. The statutory review was added to the Bill in order to placate the Lords.
- Section 26 provided for an independent review of a "section 25" scheme (basically TEF) within a year of the Act becoming Law.
- Dame Shirley Pearce was the reviewer, her report was submitted in August 2019 and published in January 2021.
- It's a fantastic report. It convinced the government not to continue with plans to run TEF at subject level – changed the frequency that TEF will run to every 4-5 years, ditched the award names.
- Though she found that neither employers nor students/applicants take any notice of ratings, the government is still committed to these use cases. Pearce recommended that TEF should become a means to identify, celebrate, and learn from high quality teaching.
- She also sought to see TEF make more use of qualitative data alongside metrics, noting the statistical weakness of TEF (there's a parallel, and also excellent, ONS review that informed the report





- **Proposal 1 Provider-level, periodic ratings** An overall rating should be awarded to a provider reflecting the quality of its undergraduate courses, and these ratings should last for four years.
- Proposal 2 Aspects and features of assessment Two aspects should be assessed and rated: the student experience and student outcomes. The criteria for determining ratings should be based on the extent to which very high quality and outstanding quality features are demonstrated for each of these aspects.
- Proposal 3 Rating scheme There should be three rating categories Gold, Silver and Bronze – signifying degrees of excellence above our baseline quality requirements.
- Proposal 4 Absence of excellence Where there is an absence of excellence, no rating should be awarded and the published outcome should signal that improvement is required. This outcome for a provider should be considered as part of our general monitoring of quality and standards.





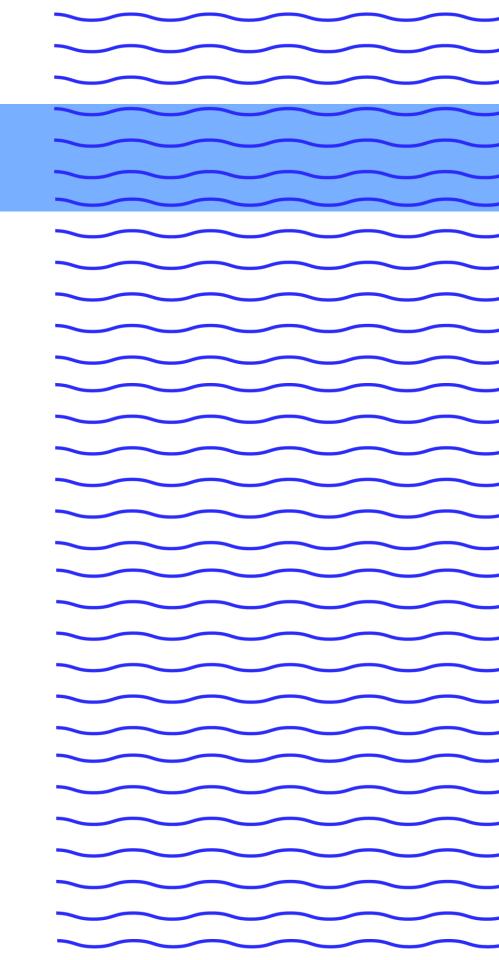
- Proposal 5 Provider eligibility To be eligible to participate in the TEF, and to retain a rating once awarded, a provider must satisfy baseline quality and standards requirements.
- Proposal 6 Courses in scope All of a provider's undergraduate courses, and the students on those courses, should be within the scope of a TEF assessment.
- Proposal 7 Provider submissions Participating providers should submit evidence of excellence in relation to the experience and outcomes of their students.
- Proposal 8 Student submissions Students should be encouraged to submit their views on the quality of their experience and outcomes.
- Proposal 9 Indicators The OfS should produce numerical indicators based of the National Student Survey (NSS) responses; and student outcomes indicators defined consistently with the indicators proposed for the regulation of student outcomes through condition B3. For TEF purposes, the OfS would indicate a provider's performance in relation to its benchmark.



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- **Proposal 10 Expert review** Ratings should be decided by a TEF panel applying expert judgement.
- Proposal 11 Assessment of evidence The panel should interpret and weigh up the evidence by following a set of principles and guidelines, including that: o the indicators should contribute no more than half the evidence of excellence in each aspect o the two aspects should be equally weighted when deciding the overall rating.
- Proposal 12 Published information TEF outcomes and the evidence used in assessment should be published in an accessible and timely way.
- **Proposal 13 Communication of ratings by providers** A provider should be able to display and promote its own TEF rating in accordance with a set of guidelines.





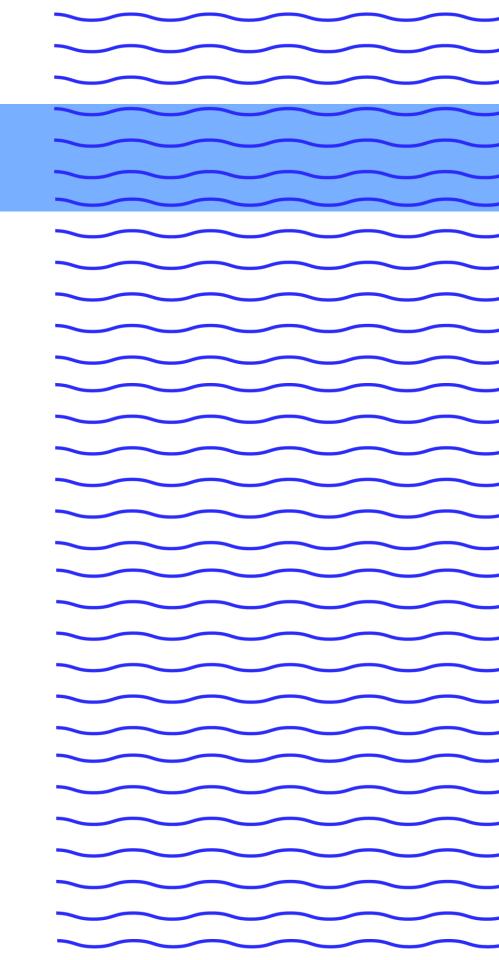
### **Proposal 14 - Name of the scheme**

• The scheme should be named the Teaching Excellence Framework.

### Proposal 15 – Timing of the next exercise

- The next exercise should be carried out during 2022-23 and outcomes published in spring 2023.
- Future exercises should be conducted every four years

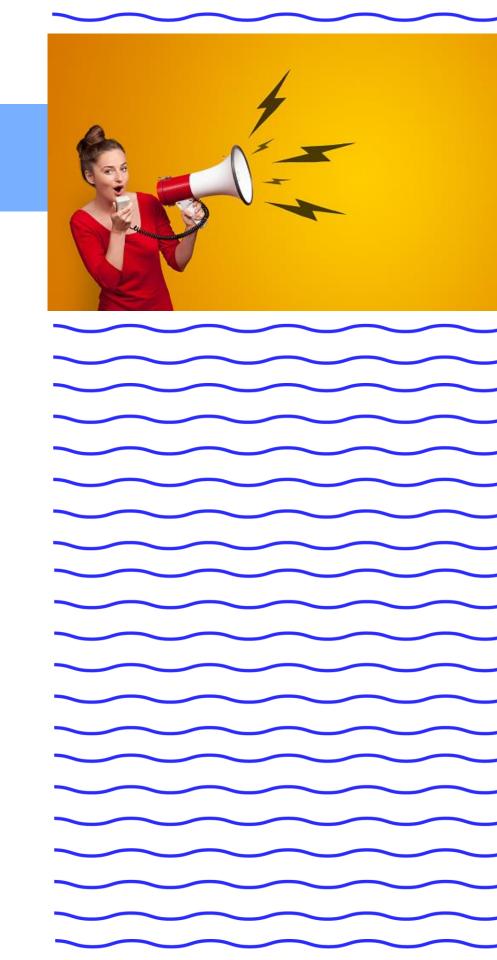




## Student voice

- Student members of TEF panels
- Student input into the narrative submission
- Use of student opinion in the NSS





## The student submission

- In QAA processes of old (England) and to some extent now (elsewhere) opportunities to submit separate and independent submission
  - Leverage over process of making that a good process
  - Leverage over issues raised in that report
- See also student submissions into Access and Participation evaluation



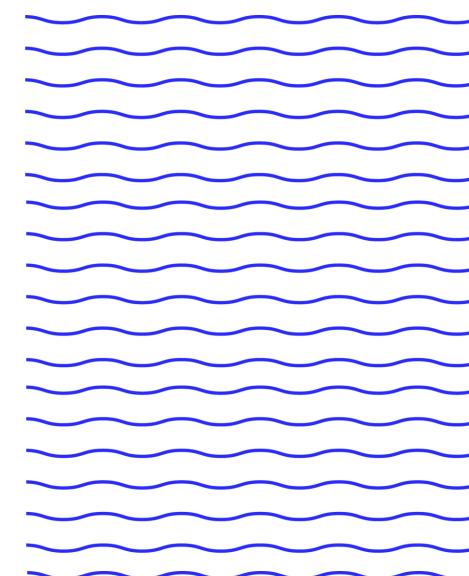


## **Great news!**

- Students contributing evidence to the panel directly
- Process that OfS says should strengthen voice locally and internally
- Recognition that views of students may differ from those of provider so leverages honesty
- The evidence may also be more contemporary than lagged indiactors



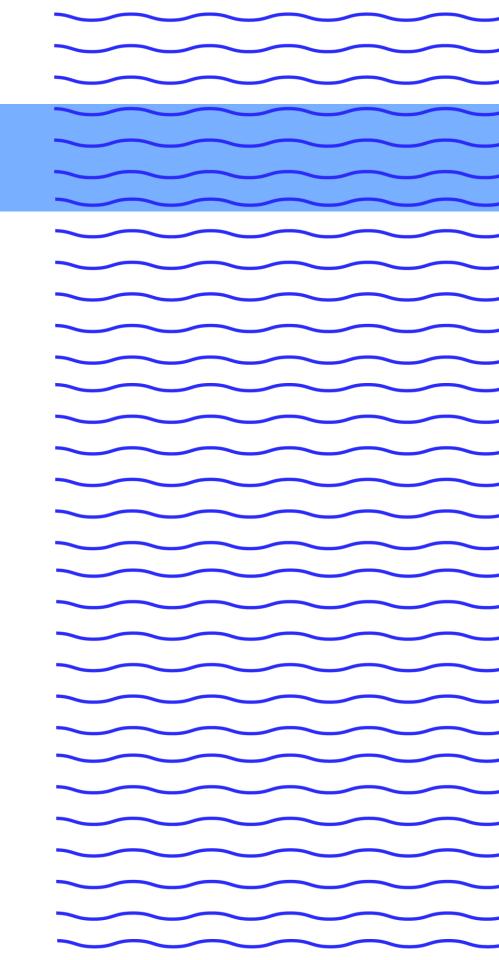




## How it will work

- One submission per university
- One "TEF student contact"
- Template and guide will be issued
- The latter has to have experience of representing students...
- Subtle warnings against ending without a submission

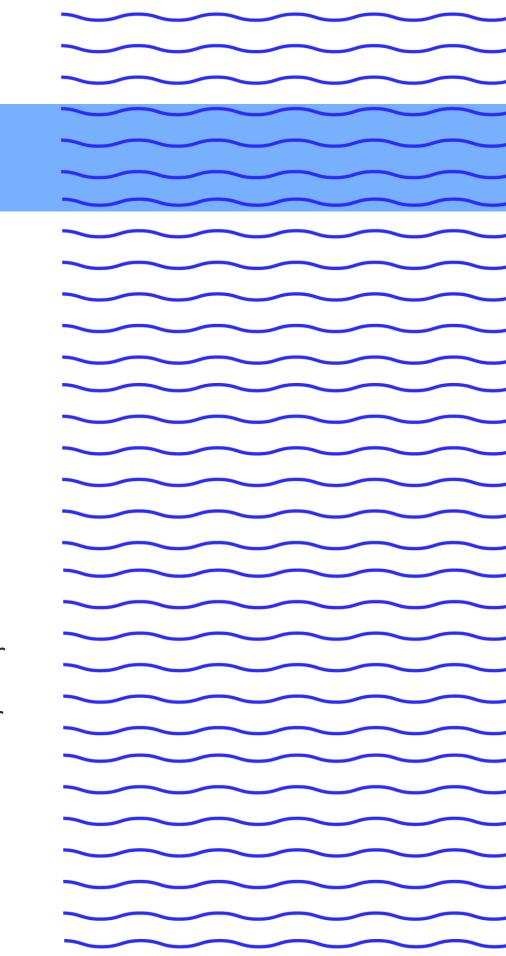




## The SWS

- 1. How students' views and other evidence presented in the submission were gathered, whether through existing student representation processes, or any additional evidence gathering activity, or both.
  - This should indicate the range of students the evidence applies to and how far the evidence is representative of the whole undergraduate student population.
  - The implication is that to be impressive and helpful, this will need to have been resourced properly via the block grant discussion including things like research capacity if the SU doesn't currently have it.
- 2. Evidence and feedback addressing the features related to the student experience and student outcomes, as determined by students as relevant to their own context.
  - submissions to be based primarily on evidence and feedback gathered directly from students (although it could also reference other evidence, such as the TEF indicators or evidence referred to in the provider submission).
  - OfS says it wants evidence gathered directly from students to supplement the provider submission and the NSS data by providing important additional insights into students' views.





# **Examples of evidence...**

- Summaries of evidence gathered through existing student representation arrangements
- Analysis of bespoke student feedback gathered via surveys, focus groups or workshops
- Where relevant, the submission should refer to the size of the samples and the categories of students involved in feedback gathering activities
- Quotes, but only where they illustrate points that are supported by a wider evidence base
- OfS will even set out expectations that a provider has to work with the TEF student contact to provide access to any other relevant information required to complete the student submission.

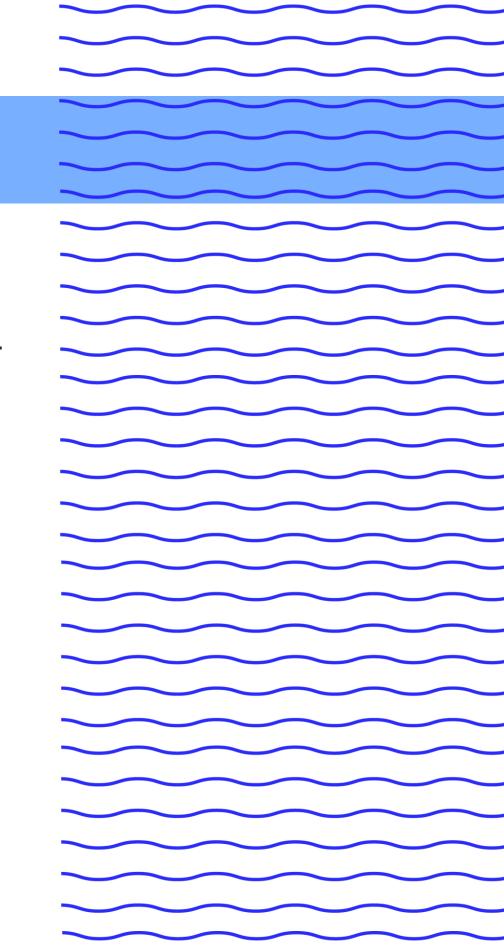


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## Also to note

- No word yet on overlap with wither QA or QE processes in nations
- OfS is proposing that a "feature of excellence" when making a TEF award will be "The provider effectively engages with its students, leading to improvements to the experiences and outcomes of its students". SUs may want to feed back on the need in that description to differentiate between surveying students and having students as representatives or partners.
- Panel guidance: "Evidence would be more compelling, and greater weight placed on it, where it clearly articulates the views of students, and is broadly representative of all student groups and courses within the scope of the TEF assessment.



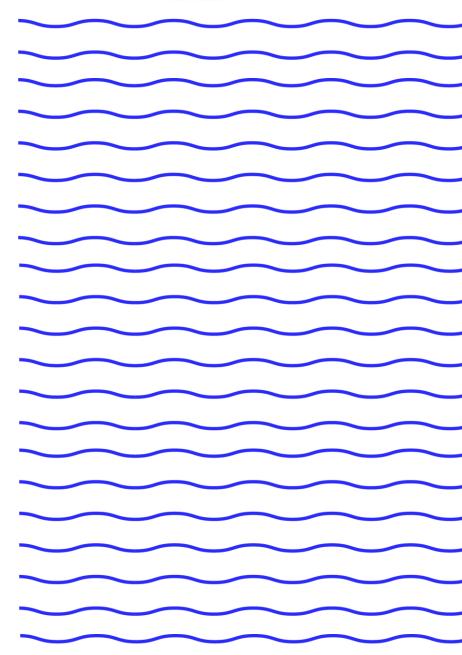


## Next steps

- There's an official chance for SUs to respond to these proposals until 17 March 2022.
- From there in theory the timeline is as follows:
  - August 2022: OfS appoints TEF panel
  - Early September 2022: The provider and student submission window opens: OfS publishes guidance on submissions and assessment; OfS publishes TEF indicators
  - Mid November 2022: Submission window closes
  - Late November 2022 to March 2023: TEF panel carries out the assessments
  - April to May 2023: Providers notified of the panel's provisional decisions about their ratings ; Opportunity for providers to make representations
  - May 2023: Outcomes published for providers that do not make representations









### 'Mickey Mouse' university courses could have student loans removed

Programmes with high drop-out rates and low levels of graduate employment will be under scrutiny

By Camilla Turner, EDUCATION EDITOR 15 January 2022 • 8:08pm

Universities are facing a crackdown on "Mickey Mouse" degrees as the watchdog threatens to withdraw student loan funding from low-quality courses.

Vice-chancellors will be warned by the Office for Students (OfS) that they risk being hit with sanctions - including financial penalties - if their degrees fail to deliver for students.

The higher education regulator had pledged to take a more "robust" approach to quality assurance, which will include launching investigations where bad practice is reported.

Degrees with high drop-out rates and low rates of graduate employment will be targeted by the OfS for scrutiny.

The regulator will publish proposals this week which set out the series of "minimum requirements" they expect degree courses to meet in terms of student outcomes.

If courses are deemed to consistently fall below these they could be barred from receiving student loan funding which would most likely render them financially unviable.

## WONKHE



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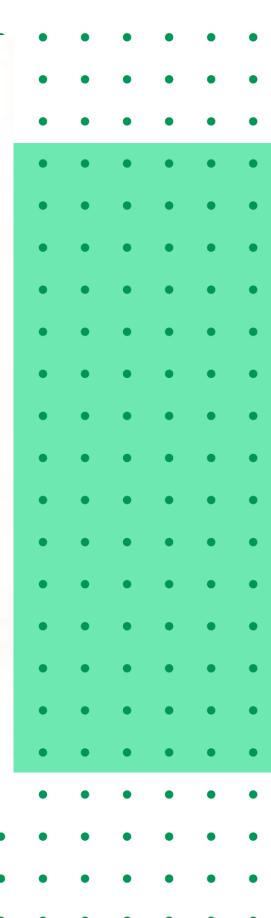
If courses are deemed to consistently fall below these they could be barred from receiving student loan funding which would most likely render them financially unviable.

### NEWS.

## £500,000 fines for 'Mickey Mouse' courses

Universities that run "Mickey Mouse" degree courses face being fined up to £500,000, under plans by the watchdog to "stamp out" bad practice. The Office for Students is to crack down on degrees with high student dropout and low graduate employment rates, as well as those with significant grade inflation. Under proposed reforms, the OfS could investigate university departments and faculties if there is evidence that individual courses are not up to scratch. Page 4

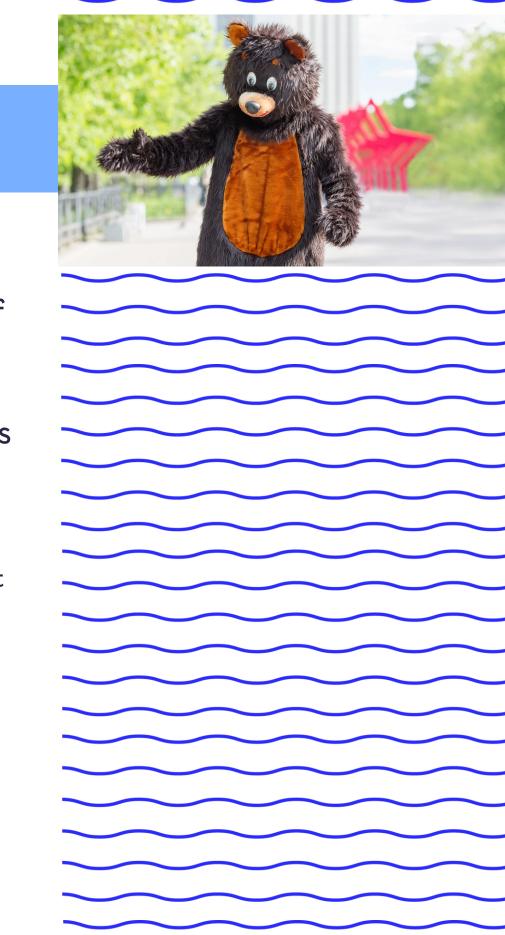
## WONKHE



## The B3 bear

- This is a condition relating to the quality of the higher education provided by the provider.
- In judging whether a provider is delivering successful outcomes for all of its students, which are recognised and valued by employers and/or enable further study, material that the OfS may consider includes
- A range of student outcomes indicators, broken down to show outcomes for students with different characteristics that include, but are not limited to:
  - i. Student continuation and completion rates.
  - ii. Degree and other outcomes, including differential outcomes for students with different characteristics.
  - iii. Graduate employment and, in particular, progression to professional and managerial jobs and postgraduate study.
- Any other information from employers and others about the extent to which a provider's qualifications are recognised and valued.

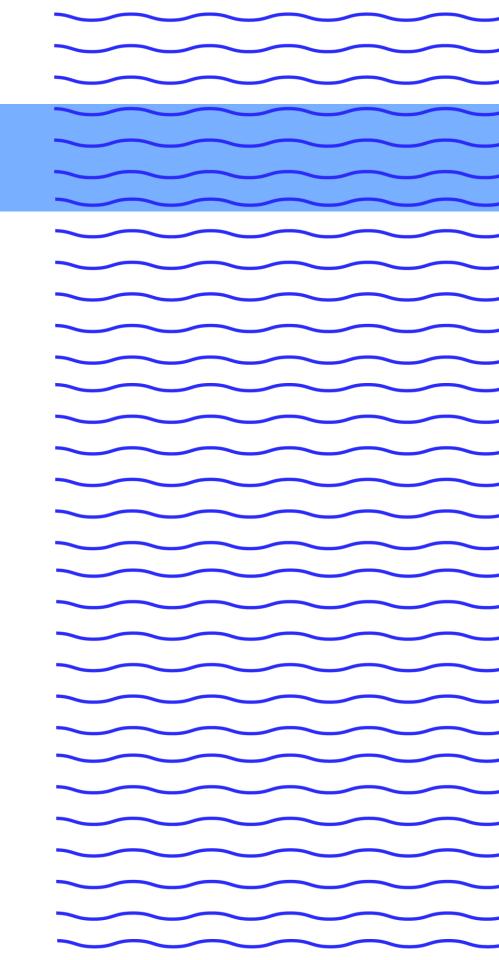






- The condition is assessed in two stages.
- The first considers the absolute outcomes delivered by the provider for its students.
- The second gives consideration of the context in which these outcomes are achieved.
- Regulatory interventions, such as a specific condition, mitigate risks of future breach.

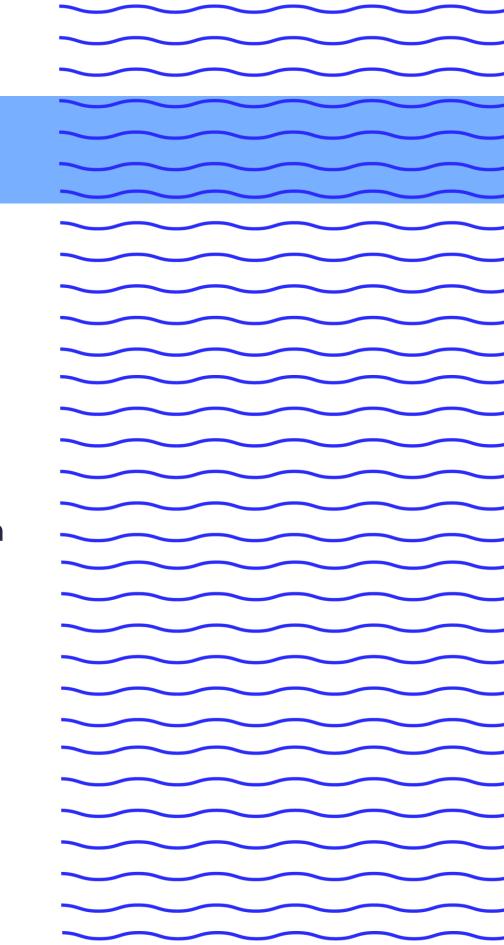




## **B3 bear**

- We set a minimum baseline requirement for quality, which includes a minimum level for student outcomes.
- Our intention in doing so is to be clear that all students are entitled to the same minimum level of quality.
- We do not accept that students from underrepresented groups should be expected to accept lower quality, including weaker outcomes, than other students.
- We therefore do not bake their disadvantage into the regulatory system by setting lower minimum requirements for providers that typically recruit these types of students.
- For this reason, in assessing a provider's performance we focus on performance shown in absolute rather than benchmarked indicators, although we will take a provider's context into account in reaching our judgement to ensure we have properly interpreted its absolute performance.





# Initial registration

- In the initial registration phase it managed to generate 147 "interventions"
  - 50 formal letters
  - 77 lots of "enhanced monitoring"
  - 20 specific (and public) conditions of registration
- as well as playing a starring role in five of the six outright registration refusals that have so far been made public.
- Plus a starring role in Bloomsbury and Dagenham College cases





# We will get baselines

- Continuation rates help it understand whether a provider is recruiting students able to succeed through the early stages of its courses, with the appropriateness of recruitment and student support under the spotlight;
- It says **completion** is similar and provides a look over the whole student lifecycle. This difference in focus means that there will not be a direct, linear, relationship between a provider's continuation rate and its completion rate.
- Meanwhile progression tells OfS whether a provider's students have successful student outcomes beyond graduation.





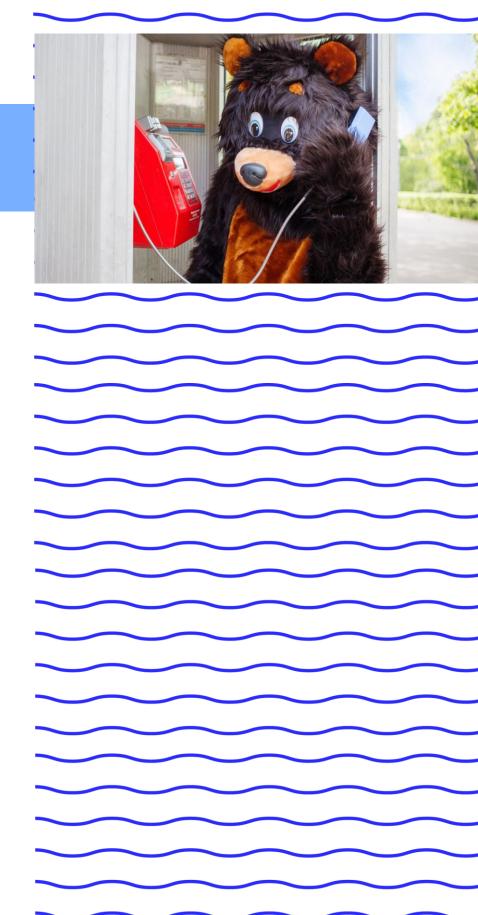
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## How?

- Performance "in aggregate", over a "time series" (for the number of years up to a five year period for which indicators could be derived from available)
- Across splits for different demographic groups

   broken down by mode (full or part-time) and level of study (for example "other undergraduate", first degree), as well as by age, participation of local areas (POLAR), English indices of multiple deprivation (IMD), ethnicity, disability, sex and domicile.



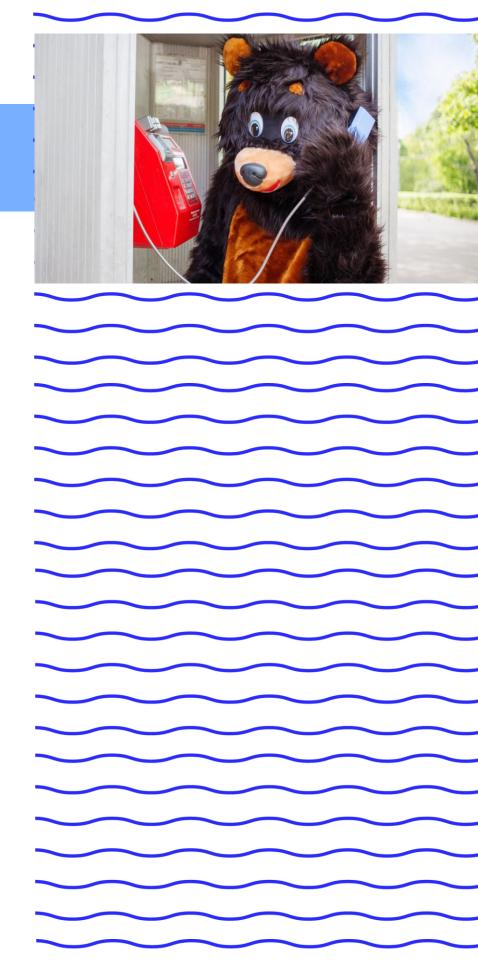




## Splits by

- Subject level (level 2 of the Common Aggregation Hierarchy is proposed)
- Course type
- Views of a provider's student population
  - Franchise? Awarding?





## **Blame it on the baseline**

• Baseline for each indicator (in each mode and level of study that the provider delivers) and published stats.

### Table 1: Summary of proposed numerical threshold levels

Level and mode of study	Continuation	Completion (cohort tracking)	Completion (composite indicator)	Progression
FT Other UG	75%	65%	65%	45%
FT First Degree	80%	75%	75%	60%
FT UG / PG border	85%	85%	80%	80%
FT PGCE	85%	85%	85%	85%
FT PG Taught Masters	80%	80%	80%	70%
FT PG Other	80%	80%	80%	85%
FT PG Research (PhD)	90%	75%	75%	85%
PT Other UG	55%	55%	55%	65%
PT First Degree	60%	55%	55%	75%
PT UG / PG border	60%	60%	60%	80%
PT PGCE	75%	75%	75%	85%
PT PG Taught Masters	65%	65%	65%	85%
PT PG Other	65%	60%	65%	85%
PT PG Research (PhD)	70%	60%	60%	85%
Apprenticeship – UG	70%	55%	55%	75%
Apprenticeship – PG	80%	80%	80%	80%

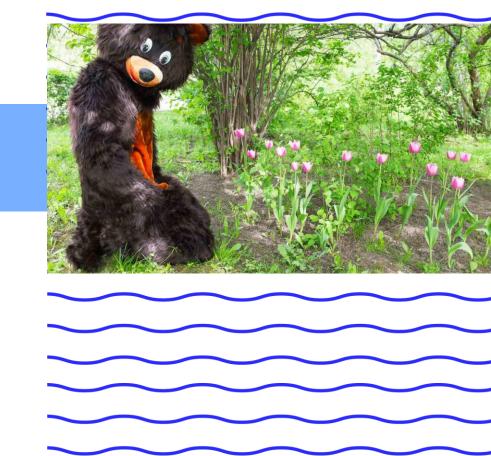
### Figure F1: Examples of assessing indicators and split indicators

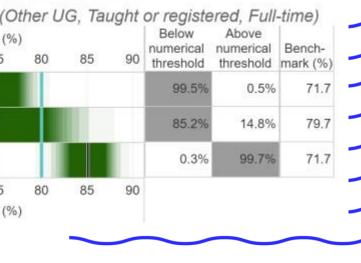
Student and study characteristic split indicators: Continuation (Other UG, Taught or registered, Full-time)
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Year 2	70	75.0				
Year 3	440	85.0				
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Note: 'FT' = 'full-time'; 'PT' = 'part-time'; 'UG' = 'undergraduate'; 'PG' = 'postgraduate'.







## Blam Table 1: Summary of proposed numerical threshold levels

## Baseline level of publishe

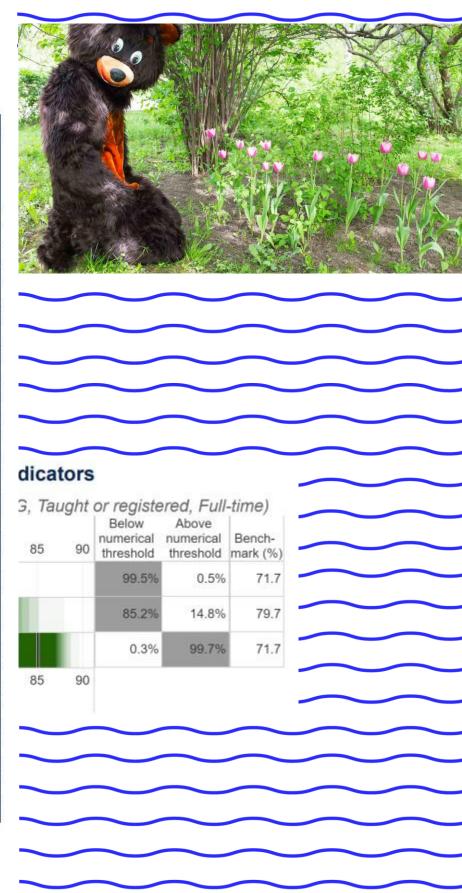
Level and mode of study	Continuation	Completion (cohort tracking)	Completion (composite indicator)	Progress
FT Other UG	75%	65%	65%	
FT First Degree	80%	75%	75%	(
FT UG / PG border	85%	85%	80%	
FT PGCE	85%	85%	85%	1
FT PG Taught Masters	80%	80%	80%	
FT PG Other	80%	80%	80%	1
FT PG Research (PhD)	90%	75%	75%	1
PT Other UG	55%	55%	55%	l
PT First Degree	60%	55%	55%	
PT UG / PG border	60%	60%	60%	1
PT PGCE	75%	75%	75%	1
PT PG Taught Masters	65%	65%	65%	1
PT PG Other	65%	60%	65%	
PT PG Research (PhD)	70%	60%	60%	1
Apprenticeship – UG	70%	55%	55%	10
Apprenticeship – PG	80%	80%	80%	1

Note: 'FT' = 'full-time'; 'PT' = 'part-time'; 'UG' = 'undergraduate'; 'PG' = 'postgraduate'.



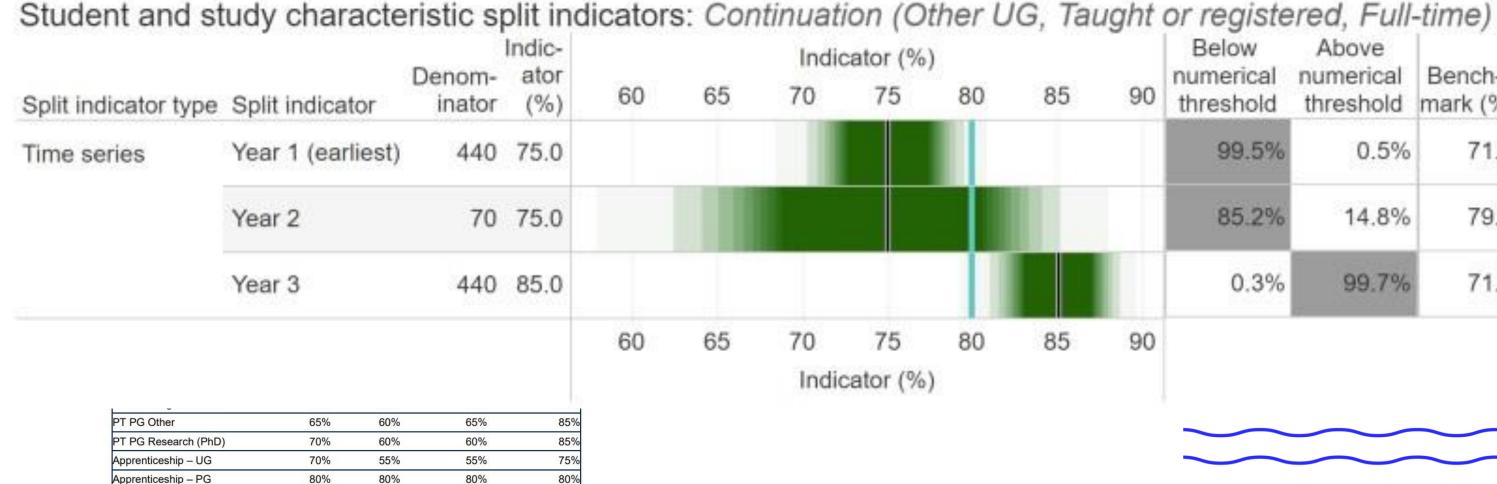
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## **Blame it on the baseline**

### Figure F1: Examples of assessing indicators and split indicators



Note: 'FT' = 'full-time'; 'PT' = 'part-time'; 'UG' = 'undergraduate'; 'PG' = 'postgraduate'.





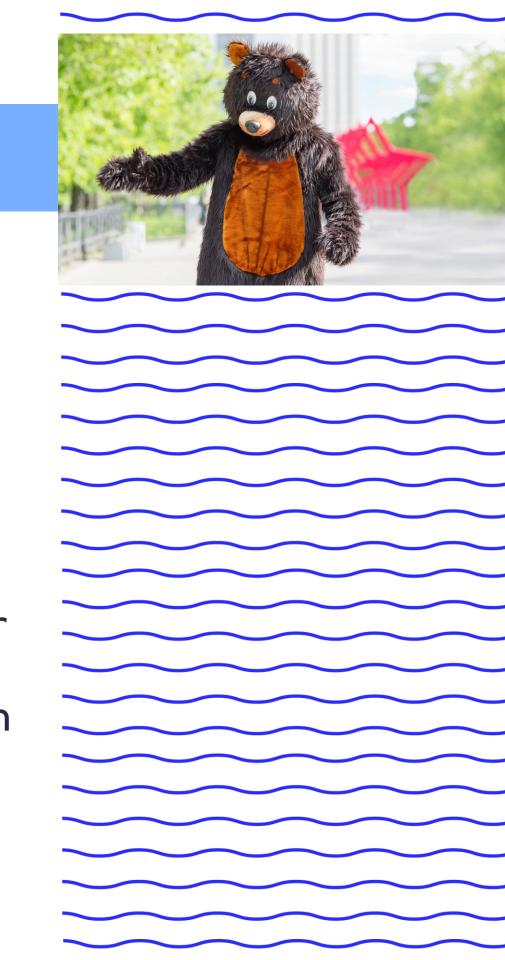
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90	Below numerical threshold	Above numerical threshold	Bench- mark (%)
	99.5%	0.5%	71.7
	85.2%	14.8%	79.7
	0.3%	99.7%	71.7

## Then...

- Publish the information via a dashboard on the website
- Explore the possibility of linking the information directly to an individual provider's entry on the register
- Publish sector-wide data analysis on the website, and even
- Consider how to link to the information from Discover Uni to provide a route for interested students to understand the performance of individual providers in more depth.





## And then

- It could take a thematic approach, for example identifying areas of provision where it
  has a particular concern about outcomes across the sector. This might include, for
  example, part-time students on other undergraduate courses, or courses of all types in
  a particular subject, or outcomes for disabled students. Whatever ministers are
  exercised about this week, in other words.
- It could prioritise providers where performance in relation to numerical thresholds suggests that there may be the most **severe breaches**.
- It could prioritise providers where performance in relation to numerical thresholds suggests that there may be breaches relating to **particular groups of students**.
- It could prioritise providers for which it has the **strongest statistical confidence** that performance is below a numerical threshold.
- It could randomly select providers with indicators below a relevant numerical threshold
- It could be given a list of providers by Michelle Donelan whose VCs were mean when she did a ring round about in-person teaching.



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## Looks at data and then

- Contextual factors
- Historical (pandemic or course features See Norland)
- Future (we've already started to do something) about this)
- then Regulation letters, conditions, fines, exclusion from register





# What do you do?

- You can **ignore** it because you reckon you can front out contextual reasons or because it's an outlier that might not be in a big theme this year
- You work to actually **improve** the continuation, completion or progression scores, although there's necessarily a long lead time on making a difference
- You change the students you recruit by taking fewer risks on otherwise contextually talented students - focussing on the social backgrounds more likely to stay the course and have the family connections to get a graduate job
- You slowly, quietly, carefully **exit** this provision. "It's not one of our strengths" or whatever, and anyway the costs are high and recruitment is poor and...

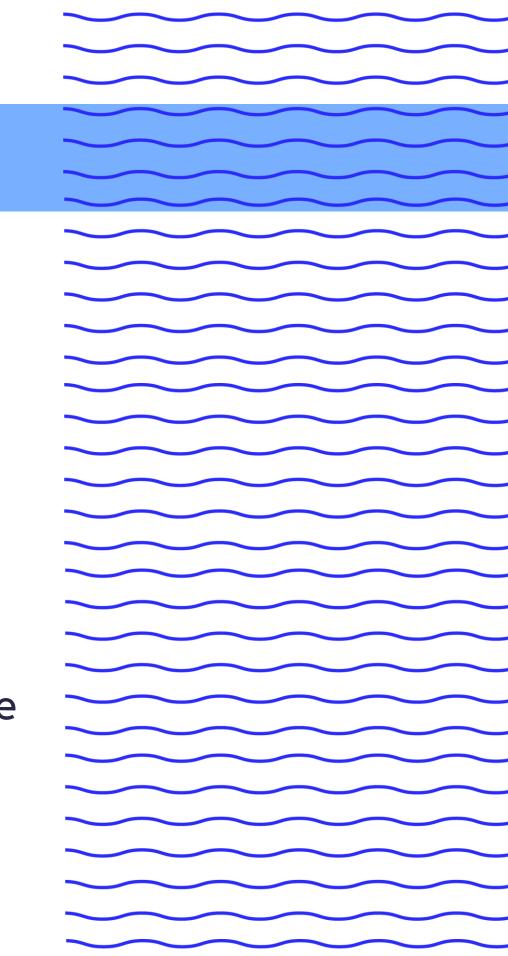


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# Critiques

- Is this a provider's "fault" and what led to the numbers?
- Unintended consequences provider behaviour
- Hard to know how many/much split-based poor performance will be tolerated, and why
- Lots of focus on what, almost nothing on why
- What if this results in a reduction of choice (esp for local students)
- Quality as "the extent to which we're prepared to take a chance on you"





## The bear is back

The Office for Students and condition B3 (student outcomes)

