

## OfS: Proposed guidance on student submissions

1. This annex sets out further information that would form the basis for guidance on student submissions. We have not prepared full draft guidance at this point as it is our intention to develop it in accordance with the decisions that follow from this consultation.
2. We welcome comments on the content of this annex as well as the proposals set out in the main consultation.
3. This annex covers proposals for:
  - a. TEF student contacts.
  - b. Submission content and coverage.
  - c. Verification process.

This annex also summarises, at a high level, operational details that the guidance would be expected to cover.

### TEF student contacts

4. We propose that the provider should nominate a TEF student contact, who would act as a point of contact with the OfS for operational matters relating to the student submission and is likely to be the person able to coordinate the student submission on behalf of the provider's students. A second student could also be identified to act as a backup contact. We would invite TEF student contacts to attend training and support sessions arranged by the OfS.
5. While we propose to publish student submissions (see proposal 12), the name of a TEF student contact would not, in general, be included in that publication.
6. The OfS recognises that student representation structures vary across the higher education sector. We would normally expect the nominated TEF student contact to be an elected student representative. They could be, for example, an education-related sabbatical officer, or other student with a relevant role or experience in representing the provider's students on education or quality matters. We consider this would enable a TEF student contact to deploy their understanding of student representative structures at the provider, and their experience of gathering feedback from students, to coordinate a submission that represents the views of a diverse range of students. As the student submission should be independent, it is not appropriate for a member of the provider's staff to undertake the role.
7. When nominating the TEF student contact the provider would be asked to state why they consider the nominee to be suitable for the role. If this does not demonstrate that the person has a relevant role or experience in representing the provider's students, we may ask the provider to nominate a different individual. If a provider intending to participate in the TEF fails to nominate a TEF student contact, we will request an explanation for this and consider what further action should be taken to ensure the provider's students have an opportunity to make an independent submission. We would welcome views on how an independent student submission could be facilitated where student representation structures are less formal or less well-developed.
8. We acknowledge that some students at some providers may not wish to make a submission, and in these cases would still expect a TEF student contact to be nominated, so that they (rather than the provider) can confirm they have made this decision. We would also ask them to confirm whether the provider's students had been given the opportunity to contribute to the provider's submission.

9. In nominating the TEF student contact, consideration should also be given to the proposed timing of the student submission window, including the potential need to prepare for, and then produce, the submission across two academic years. A new TEF student contact may need to be nominated following a change-over of elected student representatives, and the OfS would encourage the provider to put in place plans to ensure continuity in submission preparation. A provider would be expected to ensure the OfS holds up-to-date details for its TEF student contact.

## **Submission content and coverage**

10. We propose that in broad terms student submissions should cover:
  - a. 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.
  - b. Evidence and feedback addressing the features related to the student experience and student outcomes, as determined by students as relevant to their own context. We would encourage the submission 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. This is because evidence gathered directly from students could supplement both the provider submission and the NSS data by providing important additional insights into students' views.
11. As with the provider submission, we propose providing a basic template that students could use to complete their submission. We propose that the template would include the following headings:
  - a. Approach to evidence gathering.
  - b. Student experience.
  - c. Student outcomes.

Annex F sets out how the panel would be guided to interpret evidence in the student submission.

## **Proposed types of evidence**

12. As with provider submissions, we do not intend to prescribe particular types of evidence that students should include in their submission, because we consider that students will be best placed to know which evidence is most appropriate to use given their particular context. Instead, we would expect to set out in the guidance non-exhaustive examples of types of evidence that students might wish to include. This could include summaries of evidence gathered through existing student representation arrangements, or analysis of 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.
13. As with provider submissions, we propose that where quotes are used in the student submission, they should normally illustrate points that are supported by a wider evidence base. They would not normally be considered as strong evidence on their own, as the panel may not be able to judge the extent to which the quote applies to a range of students or courses.

14. We would also set out expectations that a provider's TEF Contact would work with the TEF student contact to provide access to any other relevant information required to complete the student submission.
15. As set out under proposal 8, we do not propose that student submissions should include references and be subject to verification in the same way as provider submissions. Instead, we propose that the panel would gauge the strength of evidence in student submissions by considering the submitted information about how the evidence was gathered and the extent to which it is representative.
16. We propose that only in exceptional cases, the TEF panel may ask the OfS to seek verification from the TEF student contact if there appear to be inaccuracies in the submission. The panel would be likely to do so only where verifying the information could potentially have an impact on a rating awarded. This might occur, for example, where information appears to contradict the different sources of evidence being considered, i.e. the provider submission or the indicators.
17. If verification is required, we would ask the TEF student contact to explain what evidence the relevant piece of information is based on. The panel would then consider this when weighing up the evidence. These arrangements are intended to minimise the burden on TEF student contacts while ensuring the panel can weigh up the sources of evidence appropriately when forming its judgements.

## **General coverage of the guidance**

18. In addition to the issues covered under proposal 8 and in this annex we anticipate the guidance will also set out:
  - a. Background information, including the role of the OfS and the purpose of the TEF.
  - b. A recommended template, and guidance on how to structure and format the submission, and how to make a submission in a non-written format.
  - c. Advice on how to gather and present evidence and student views, and other resources available to support the TEF student contact.
  - d. Instructions and timelines for making submissions.
  - e. The process for the OfS publishing student submissions.

Information relating to accessing and understanding the TEF indicators would also be published by the OfS.