



# **OfS Consultation- Student outcomes and teaching excellence- The Teaching Excellence Framework (TEF)**

CIMSPA Response

March 2022

## Questions relating to all proposals

### Question 1

**Are there aspects of the proposals you found unclear? If so, please specify which, and tell us why.**

**Response:** No aspects of the proposals were unclear.

### Question 2

**In your view, are there ways in which the policy intention (see the box 'The purpose of the TEF' on page 12 of the consultation document) could be delivered more efficiently or effectively than proposed here?**

**Response:** The intention to incentivise excellence is clear. It will become a performance league table which may mislead where different types of HEI are compared at a superficial level by those stakeholders making choices about destination/studies.

## Questions relating to specific proposals

### Question 1

**To what extent do you agree with our proposal for provider-level, periodic ratings (proposal 1)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Response:** Tend to agree

**Comments:** The Chartered Institute for the Management of Sport and Physical Activity (CIMSPA) is the representative professional body for the whole of the UK in relation to sport and physical activity sector, is the guardian of all associated professional standards, and the QAA-recognised PSRB for higher education institutions. Nearly half of all universities in England are also CIMSPA partners. We are generally supportive of the agenda and policy in relation to TEF and pleased to see the home nations will all at some point be consulting on this. We believe consistency and transparency across the piece is important, so the differences between home nations where involvement in the TEF (or equivalent) may eventually be either

mandatory or optional is a concern. We agree in principle that the ratings should be at provider level and across the proposed four-year period. Further into the consultation we explain the potential for lack of comparability where subject level evidence is optional, but we believe overall this proposal presents a more manageable burden.

## **Question 2**

**To what extent do you agree with our proposal for aspects and features of assessment (proposal 2)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Response:** Tend to agree

**Comments:** We agree that a “per institution” rating is better than a per subject, but if it is optional, an institution may naturally their best performing subjects, of which the quantity submitted may vary, thus affecting comparisons Para 35 re, “we propose that educational gains would be assessed based on qualitative and quantitative evidence that a provider determines itself and includes in its submission. This could also be supplemented by evidence in the student submission”. This will be crucial for CIMSPA partners.

## **Question 3**

**To what extent do you agree with our proposal for the rating scheme (proposal 3)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Response:** Tend to agree

**Comments:** We agree in principle that a requirement for publishing detailed information on provider ratings does help as a perceived level for prospective students, but may not take into account (because they were not part of the review) high performing subject areas. Of course this is the responsibility of the provider and their submission. Regardless, this may be a pitfall of institution level ratings

#### **Question 4**

**To what extent do you agree with our proposal for where there is an absence of excellence (proposal 4)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Response:** Tend to disagree

**Comments:** We have some concerns about this proposal: para 14 of the consultation states ‘..(the OfS) also took the view that publishing TEF outcomes and the underlying data would help to incentivise improvement, by affecting providers’ reputations.’ More clarity is needed here where affecting reputations is not explicitly stating this outcome as a positive: is it OfS intention to set out to knowingly negatively affect reputation via public “admonishment” of an absence of excellence (“Requires Improvement”) – this may be a perverse incentive. An alternative could be that the publication of a provider’s TEF report year N is obligatory, and the absence of a Gold/Silver/Bronze indicator would speak for itself. The report (should it be of interest) will contain the result and explanation.

#### **Question 5**

**To what extent do you agree with our proposal for provider eligibility (proposal 5)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Response:** Tend to agree

**Comments:** We agree in principle, however many of the sport and physical activity sector providers work closely with those currently out of scope (for example FE providers offering validated courses) and we look forward to the expansion to capture in – for example – foundation level providers who provide a vital progression opportunity, particularly those providers in scope whose footprint represents generally under represented profile as is often the case in sport.

#### **Question 6**

**To what extent do you agree with our proposal for courses in scope (proposal 6)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Response:** Tend to agree

**Comments:** We agree in principle with the proposal to include undergraduate courses where students are directly taught, however welcome the future possibility of including validated-only courses too.

### Question 7

**To what extent do you agree with our proposal for provider submissions (proposal 7)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Response:** Tend to disagree

**Comments:** We agree in principle with the proposal for provider submissions and welcome the new approach to the balance between the use of provider, student submissions and OfS indicators. We have some concerns over the potential variation between provider submissions with regard to the optionality, and how this may distort the inter-provider comparisons for the national view. Furthermore, in the sports sector the provider type, size and student socio-economic footprint varies widely and we are keen the proposed indicators and qualitative evidence allowable takes this into account. CIMSPA seeks to support and represent all high quality HEI partners as the PSRB.

### Question 8

**To what extent do you agree with our proposal for student submissions (proposal 8)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Response:** Tend to agree

**Comments:** We have some concerns with some aspects of this proposal. These are optional and a provider can submit without a nominated student representative submission. Additionally, there is a risk that providers might incentivise or target certain populations/cohorts to participate. There is guidance as to how this may work, and incentives may not be an issue, although there may be a risk of a vested or conflict of interest. There is a suggestion in the proposal that a student element of the submission rolls forward into a subsequent year. It is unclear if this would thereafter take account of the additional year's activity (which may or may not

have a bearing on the provider submission) considering, as is stated, that the TEF review is retrospective at the point of submission.

Separately, it remains unclear how the act of teaching itself is measured, monitored or reviewed as part of the TEF. It is mentioned 72 times but almost always as a partner to “...and learning”. Whilst there are very clear metrics and evidence (both qualitative and quantitative) for excellence in learning outcomes, teaching excellence is not uniquely defined: is it coaching, mentoring, relational, pedagogical, online vs f2f balance? Currently it is an exercise in extrapolation, which makes sense as to the separation of the REF, and may not be possible due to the review being at the holistic provider level, rather than subject. The external view of teaching as a venerated skill, however, appears to remain absent. The point may be moot, but has been at the forefront of student dissatisfaction during the pandemic, bringing it to the forefront of the debate, particularly as a metric for value for money. The subject of sport (be that sports medicine, psychology or management, as examples) is, by nature, a subject requiring such high levels of practical and pedagogical skills (as coaches, mentors as well as tutors) bringing a host of skills and expertise that often bleeds across campus, typically via the value-added extra-curricular sports programmes. Where such subject areas are under pressure due to outdated and misrepresented SOC codes (particularly for the sports sector), capturing this qualitative evidence might be crucial for some providers

### **Question 9**

**To what extent do you agree with our proposal for indicators (proposal 9)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Response:** Tend to agree

**Comments:** We agree in principle to this proposal. Please refer to our earlier comment regarding subject specific student profiles in relation to socio-economic groups. This particularly relates to TEF page 9 where – “(the OfS) continue to take steps through our regulation of access and participation to reduce the gaps in equality of opportunity between students from underrepresented groups and other students, before, during and beyond their time in higher education.”

## Question 10

**To what extent do you agree with our proposal for expert review (proposal 10)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Response:** Tend to agree

**Comments:** Although we agree in principle with the proposed approach, it is CIMSPA's view that any "expert" reviewer should also have regard to an individual's institution's typical student demographic and socio-economic level and – at subject level – the profile, background and economic factors which influence and affect workforce opportunities as appropriate markers for progression post-hoc. Recruiting your experts from an open field won't necessarily ensure the level of expertise you may be searching for, and the process itself (ie a small panel of "experts" and their decision possibly being overturned by the subsequent proposed "larger" panel, and/or standardised to calibrate) may see the requirement for such expertise minimised due to a quasi-awarding process familiar to exam boards. Whilst this proposed process goes some way to ensure reliability and consistency, it may be to the cost of the original validity of the expert view... decision by committee.

## Question 11

**To what extent do you agree with our proposal for the assessment of evidence (proposal 11)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Response:** Tend to agree

**Comments:** CIMSPA somewhat agrees with this proposal. We acknowledge that student outcomes are to be a limiting factor on overall TEF results, but with subject-level submissions of evidence being optional, it should be made clear the absence of such evidence may produce skewed judgements by the panel of experts. We agree in the principle of holistic judgment, but weighting experience and outcomes equally whilst bearing in mind this concern, may render this approach challenging on occasion. It is also important to ensure an institution is compared to itself and the factors outlined in your proposal, rather than compared in rank order to a perceived "best in class" institution, which may bear no direct comparison as an entity. Finally, experts should be free from intrinsic bias and declare any conflicts of interest during selection and allocation processes – this should be the level of

transparency to which the TEF principles apply: who was judging, as well as what was judged and how. CIMSPA expects to play a contributory role (as would all PSRBs) where appropriate, in providing the expert view on subject-level evidence. Professional bodies represent the collective voice of an industry, and are the acknowledged experts in an occupational realm where this relates to specific fields of study.

### **Question 12**

**To what extent do you agree with our proposal for published information (proposal 12)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Response:** Tend to disagree

**Comments:** We disagree with some aspects of this proposal. If the OfS accepts that different institutions' TEF outcomes will be published at different times, then it seems only appropriate and fair to an individual institution who is in the process of making representations, that any interim judgment is NOT published until such a time as this is concluded. All stakeholders should be able to have confidence in publicly available information, so where such judgements are first published, then subsequently amended, such confidence can be eroded. All aspects of the TEF exercise should be published at once: a drip-feed approach may not help in building a cohesive picture for the end-user who may wish to research and draw upon all such available information for a single decision over a short period of time (for example researching study options).

### **Question 13**

**To what extent do you agree with our proposal for the communication of ratings by providers (proposal 13)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Response:** Tend to agree

**Comments:** CIMSPA has nothing further to add with regard to this proposal



#### **Question 14**

**To what extent do you agree with our proposal for the name of the scheme (proposal 14)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Response:** Tend to disagree

**Comments:** We accept that TEF is now a familiar acronym, so is a sensible decision to retain. We do, however, draw attention to earlier comments that “teaching” as an observable skill in all its measurable and qualitative aspects is not something that the OfS has directly or discreetly undertaken to measure in a meaningful way via the TEF, that would impact a student’s experience, and thus outcomes.

#### **Question 15**

**To what extent do you agree with our proposal for the timing of the next exercise (proposal 15)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**Response:** Tend to disagree

**Comments:** The timing of the first TEF round is ambitious: it relies on this set of proposals being implemented as described, but the predominant assumption is that OfS attracts, recruits, trains and standardises a whole new set of expert panel individuals in a matter of weeks. Better would be to operate either as a pilot, or alongside normal OfS regulatory activity for this next academic year to test, trail and validate. AT a time when the Augur Review recommendations and post-18 education changes (loans etc) have recently been published by the DfE, further affecting institutions’ risk profiles, it is more important than ever to get this right, rather than simply go live to avoid embarrassment of further (necessary) delay.



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