

Response ID ANON-TWMW-TNTF-B

Submitted to **Independent Review of TEF: Call for views.**

Submitted on **2019-03-01 19:54:35**

Who are you?

1 What is your name?

Name:

Dr Kevin Houston

2 What is your role/position (if relevant)?

What is your role/position (if relevant)? :

Education Secretary of the London Mathematical Society and Senior Lecturer, University of Leeds

3 What is your email address?

Email:

education@lms.ac.uk

4 In what capacity are you responding to this consultation?

Representative organisation, business, or trade body

If other, please specify below:

5 Are you responding on behalf of an organisation (eg. higher education provider, student union or representative group)?

Yes

a. If yes, what is the name of your organisation?:

London Mathematical Society

Yes

6 Have you been involved preparing for or writing a TEF or subject TEF submission?

No

7 Have you been involved as a TEF assessor or panel member (for provider TEF or in the subject pilots)?

No

8 Would you like us to keep your responses confidential?

No

If yes, what is the reason for confidentiality?:

9 Please indicate which UK country/other country you are responding from.

Please indicate which UK country/other country you are responding for. :

England

If you are responding from a country outside of the UK, please write this in below.:

Why have TEF?

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

Yes

Please explain why:

The aims are supported. We do not believe that the TEF can meet those aims.

In the future education systems may conceivably invent effective methods of assessing "teaching quality" in university mathematics. However, we see no uniform bureaucratic way of achieving this objective at present, or in the foreseeable future. We anticipate (and have already seen evidence of) serious damage if the government persists with the proposed framework: it is indicative of our current difficulties that to provide evidence of such instances would place identifiable

individuals and departments in potential difficulties.

We have chosen to answer "No comment" to some questions below not as an indication of neutrality but as indication that our answer to this question (Q10) and, in particular Q14, are sufficient to register our serious concerns and objections about the fundamental inappropriateness of the TEF in assessing teaching quality.

Why have TEF?

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

Both are equally important

b. Please outline below the reasons for your answers :

No comment.

12 Should there be any other purposes for TEF?

Should there be any other purposes for TEF? :

No comment.

What is TEF?

How does TEF work?

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

No

If not, what criteria would be more appropriate? :

These may seem appropriate. However, see Q14.

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".

No

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

Many of the metrics refer not to the quality of teaching but instead to student outcomes (the inclusion of this phrase into the TEF long title seems to be a recognition of this). Teaching quality is difficult and expensive to judge and these metrics appear to be poor proxies for teaching and are even then, somewhat incomplete. For example, despite its title, Employability and Transferable Skills, SO1 does not appear to be measured by anything other than employment and there is no measure of transferable skills.

The metrics for teaching quality all appear to be based on the NSS. This is concerning for a number of reasons. There are issues around whether the NSS gathers enough data to be robust (eg last year Oxford students again boycotted the NSS in large enough numbers that Oxford was not included). Second, there are known issues with using student evaluation to measure teaching quality. For example, there is evidence that they are biased against women and minorities:

<https://blogs.lse.ac.uk/impactofsocialsciences/2016/02/04/student-evaluations-of-teaching-gender-bias/>

<https://www.theguardian.com/higher-education-network/2016/apr/04/will-the-teaching-excellence-framework-be-sexist>

<https://www.stat.berkeley.edu/~stark/Preprints/evaluations14.pdf>

<https://www.sciencedirect.com/science/article/pii/S0272775714000417>

<https://www.tandfonline.com/doi/full/10.1080/15236803.2018.1558823>

This raises the question of the legality of using these metrics. The use of biased metrics would seem to violate the Equality Act 2010.

The metric of median earnings is also a poor measure of success. For example, it correlates with distance from London rather than reflecting excellent teaching, see <https://www.timeshighereducation.com/news/tef-metric-graduate-earnings-reflects-distance-london>, Furthermore, the use of this statistic is likely to have unintended consequences. The starting salary for a mathematics teacher (around £24K+inducements) is below the median starting salary of a mathematician (around £26K, see below). The metric provides the perverse incentive for universities to steer students away from mathematics teaching at a time of a teacher recruitment and retention crisis. Hence it appears that one part of the DfE is producing a policy that frustrates a separate DfE policy.

(Starting salaries: <https://www.savesthestudent.org/student-jobs/whats-the-expected-salary-for-your-degree.html#table>)

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).

Yes

b. Does TEF benchmark for the right factors?:

There seems to be no measure of value-added. Such a measure has been a cause of controversy for school league tables and there is no reason to believe it will not be one for the TEF.

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?:

No comment

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

The rules of the REF (and its predecessor) were different each cycle as the distortions from unintended consequences and 'gaming' by institutions were responded to. There is nothing to indicate that this will not be the fate of the TEF.

Are the ratings right?

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

No

Please explain your answer:

The use of the three ratings could have unintended consequences for recruitment of international students. Institutions or departments rated Bronze or even Silver may be shunned by international students and the governments of other countries may not permit their students to study at such institutions. For example, an overseas government only funding students attending a Gold institution may prevent Gold departments within a Silver institution from recruiting well-qualified international students.

Not Answered

Please explain your answer :

See answer to (a).

Not Answered

Please explain your answer :

See answer to (a).

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

a. For provider-level TEF?:

No comment.

b. For subject-level TEF?:

No comment.

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.:

No comment.

Has TEF changed anything?

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

Not Answered

If yes, how?:

No comment.

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

Not Answered

If yes, how?:

No comment.

21 Has the introduction of TEF impacted positively on research and/or knowledge transfer?

Not Answered

If yes, how?:

No comment.

22 Has the introduction of TEF impacted negatively on research and/or knowledge transfer?

Yes

If yes, how? :

Academics are wasting a great deal of time on TEF and this impacts on time available for research and knowledge transfer.

Is TEF worth it?

23 Does TEF help you as a student/provider/employer?

Not Answered

Please explain the reasons for your answer.:

No comment.

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

a. Provider-level TEF?:

A potential cost could be caused by game-playing: those that play the system best, not the best places, will be rewarded.

b. Subject-level TEF?:

See answer to part (a).

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

a. Provider-level TEF?:

No comment.

b. Subject-level TEF?:

No comment.

Is TEF fair?

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

Yes

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

Due to the use of the salary metrics departments in rural areas/not in the South East of England will be disadvantaged (see reply to Q14). Departments with a high proportion of female or minority teaching staff will also be disadvantaged (for evidence, again, see reply to Q14)

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

Not Answered

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

No comment.