Teaching Excellence Framework Technical Consultation – Response Form

Name/Organisation: London Mathematical Society

Please tick the box that best describes you as a respondent to this consultation:

<table>
<thead>
<tr>
<th>Respondent type</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Alternative higher education provider (with designated courses)</td>
</tr>
<tr>
<td>☐ Alternative higher education provider (no designated courses)</td>
</tr>
<tr>
<td>☐ Awarding organisation</td>
</tr>
<tr>
<td>☐ Business/Employer</td>
</tr>
<tr>
<td>☐ Central government</td>
</tr>
<tr>
<td>☐ Charity or social enterprise</td>
</tr>
<tr>
<td>☐ Further Education College</td>
</tr>
<tr>
<td>☐ Higher Education Institution</td>
</tr>
<tr>
<td>☐ Individual (Please describe any particular relevant interest; parent, student, teaching staff etc.)</td>
</tr>
<tr>
<td>☐ Legal representative</td>
</tr>
<tr>
<td>☐ Local Government</td>
</tr>
<tr>
<td>☐ Professional Body</td>
</tr>
<tr>
<td>☐ Representative Body</td>
</tr>
<tr>
<td>☐ Research Council</td>
</tr>
<tr>
<td>☐ Student</td>
</tr>
<tr>
<td>☐ Trade Union or staff association</td>
</tr>
<tr>
<td>☑ Other (please describe) Learned society</td>
</tr>
</tbody>
</table>
Preamble

The LMS is in favour of policies that support and reward, and hence promote and encourage, good teaching.

However, as will have been clear from our response to the Green Paper, https://www.lms.ac.uk/sites/lms.ac.uk/files/LMSresponse_BISgreenpaperconsultation.pdf, we are concerned that the nature and quality of the proposals for the TEF are a missed opportunity with many inherent dangers.

Given the time pressure that Brexit will put on Government and Parliament time over the next two years, we recommend that the process be put on hold for this period. This will allow use of experts to develop possible metrics and pilot them, as well as considering the whole issue of assessing teaching quality. A revised white paper could then be presented.

The currently proposed criteria do not address the substantive issue of teaching quality, or capture any vision of a university as a community of scholarship and intellectual endeavour, handing on the torch to succeeding generations. The proxies suggested, such as the NSS, and measures of outcome, are not calibrated or validated. It has yet to be demonstrated that a set of metrics can be constructed which will measure the desired qualities.

Question 1 (Chapter 1)
Do you agree with the criteria proposed in Figure 4?

☐ Yes  ☐ No  ☐ Not sure

Please outline your reasons and suggest any alternatives or additions.

While it is good that the culture of rewarding teaching is to be a criterion, the NSS is too dominant. Student opinion is of course important, and has been sought for many years at various levels, including the teaching of individual modules. But there is a tension between pleasing students and the authority of a teacher to deliver what they judge to be appropriate; such content may be challenging, and make the learning process uncomfortable.

There is research evidence that shows that student assessment of the teaching received in Mathematics does not correlate well with effective learning and successful progression to higher levels. http://faculty.econ.ucdavis.edu/faculty/scarrell/profqual2.pdf

There are also concerns that gender bias can distort student survey results.
Moreover the NSS is conducted before the end of the programme, and so another reason to doubt the validity of the NSS is that it takes place too soon. Ideally there would be a survey 2 years (and at longer intervals) after graduation that would ask the students to look back on their programme. The need for valid evidence outweighs the considerable practical and logistical difficulties of running such a survey; many students will not be in a position to give a considered view at the time the NSS is currently conducted.

Consideration of these issues needs more time and expert input. This would be possible were the TEF process to be put on hold for two years as we are recommending.

Question 2 (Chapter 3)
A) How should we include a highly skilled employment metric as part of the TEF?

Some time is needed to benchmark any such indicators. At the very least years 2 and 3 must be used to do so. Local factors, subject mix and qualification level on admission are all relevant. Additionally, until UK the economy is rebalanced some mathematical skills may be underused.

Consideration of these issues needs more time and expert input. This would be possible were the TEF process to be put on hold for two years as we are recommending.

B) If included as a core metric, should we adopt employment in Standard Occupational Classification (SOC) groups 1-3 as a measure of graduates entering highly skilled jobs?

☐ Yes ☐ No ☐ Not sure

There is a need to identify the skills actually used, not just the generic level of a post. Also, the perceived level of a post may not reflect its actual level, for instance there is a tendency for the financial managers of a business to be paid more than those who actually know how its products work.

Consideration of these issues needs more time and expert input. This would be possible were the TEF process to be put on hold for two years as we are recommending.

C) Do you agree with our proposal to include all graduates in the calculation of the employment/destination metrics?

☐ Yes ☐ No ☐ Not sure

Please outline your reasons and suggest any alternatives.

Question 3 (Chapter 3)
A) Do you agree with the proposed approach for setting benchmarks?

☐ Yes    ☒ No    ☐ Not sure

Many sociological factors have been omitted. (See also response to question 2A.)

Consideration of these issues needs more time and expert input. This would be possible were the TEF process to be put on hold for two years as we are recommending.

B) Do you agree with the proposed approach for flagging significant differences between indicator and benchmark (where differences exceed 2 standard deviations and 2 percentage points)?

☐ Yes    ☐ No    ☐ Not sure

Please outline your reasons if you disagree.

We have concerns that flags may be used as a way of summarising the data, eg by newspapers. The unintended and unforeseen consequences could be immense.

Consideration of these issues needs more time and expert input. This would be possible were the TEF process to be put on hold for two years as we are recommending.

Question 4 (Chapter 3)
Do you agree that TEF metrics should be averaged over the most recent three years of available data?

X Yes    ☐ No    ☐ Not sure

Please outline your reasons and suggest alternatives.

Question 5 (Chapter 3)
Do you agree the metrics should be split by the characteristics proposed above?

☐ Yes    ☐ No    ☐ Not sure

Please outline your reasons and suggest alternatives.

While this might slightly mitigate the obvious shortcomings, it is not enough to counteract the serious systematic flaws of the proposed metrics.
Splitting the results into categories probably means small cohorts and so false flags are even more likely to appear. In a sensitive area such as ethnicity this could be a real problem.

Consideration of these issues needs more time and expert input. This would be possible were the TEF process to be put on hold for two years as we are recommending.

Question 6 (Chapter 3)
Do you agree with the contextual information that will be used to support TEF assessments proposed above?

☐ Yes  ☐ No  ☐ Not sure

Please outline your reasons and suggest any alternatives or additions.

It is not clear how the contextual information should be used quantitatively. Any system used should be founded on careful research, and set up so that it can be operated by panels whose members will not in general have sociological expertise.

Consideration of these issues needs more time and expert input. This would be possible were the TEF process to be put on hold for two years as we are recommending.

Question 7 (Chapter 3)
A) Do you agree with the proposed approach for the provider submission?

☐ Yes  ☐ No  ☐ Not sure

B) Do you agree with the proposed 15 page limit?

☐ Yes  ☐ No  ☐ Not sure

Please explain your reasons and outline any alternative suggestions.

It is important that the ‘provider submission’ complements rather than repeats the metric information.

Question 8 (Chapter 3)
Without the list becoming exhaustive or prescriptive, we are keen to ensure that the examples of additional evidence included in Figure 6 reflect a diversity of approaches to delivery. Do you agree with the examples?

☐ Yes  ☐ No  ☐ Not sure

Please outline your reasons and suggest any additions or alternatives?
Neither in this additional evidence nor in the basic evidence proposed is there a sufficient attempt to directly assess what has been learned or what scholastic and intellectual development of students has taken place.

At present the TEF makes no attempt to assess learning gain (however we wish to define this). But one fundamental question is whether learning gain can be reasonably enough quantified or measured to be part of any attempt to measure effectiveness. This gets back to the point above, that learning gain is not a static thing that can be measured once. Part of what we are teaching is how to learn, and if done even reasonably well this can be a powerful force and one that is constantly changing.

Consideration of these issues needs more time and expert input. This would be possible were the TEF process to be put on hold for two years as we are recommending.

**Question 9 (Chapter 4)**

A) Do you think the TEF should issue commendations?

☐ Yes ☐ No ☐ Not sure

B) If so, do you agree with the areas identified above?

☐ Yes ☐ No ☐ Not sure

Please indicate if you have any additional or alternative suggestions for areas that might be covered by commendations.

**Question 10 (Chapter 4)**

Do you agree with the assessment process proposed?

☐ Yes ☐ No ☐ Not sure

Please outline your reasons and any alternative suggestions. The proposed process is set within a relatively tight timescale, reflected in the key dates included in Annex B. Responses should be framed within this context.

*Developing the TEF needs more time and expert input. This would be possible were the TEF process to be put on hold for two years as we are recommending.*

**Question 11 (Chapter 4)**

Do you agree that in the case of providers with less than three years of core metrics, the duration of the award should reflect the number of years of core metrics available?

☐ Yes ☐ No ☐ Not sure

Please outline your reasons.
Question 12 (Chapter 5)
Do you agree with the descriptions of the different TEF ratings proposed in Figure 9?
☐ Yes ☐ No ☐ Not sure

Please outline your reasons and any alternative suggestions.

General uneasiness about the whole procedure makes it hard to agree with a coarse grading method. A narrative assessment might be acceptable if more thought and expertise were first put in to the process.

One issue that bedevils all league tables is that very small differences in inputs can have outsized effects on outputs. Particularly since the TEF is going to be used to make decisions on funding/charging levels, construction of a TEF architecture that avoids this issue of outsized effects of small changes to inputs. If this is not addressed, then the TEF might become seen as inherently unfair, thus undermining part of what the Government is attempting to achieve by putting it in place.

Consideration of these issues needs more time and expert input. This would be possible were the TEF process to be put on hold for two years as we are recommending.

Thank you for taking the time to let us have your views.

We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply ☑

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would you be happy for us to contact you again from time to time either for research or to send through consultation documents?

☑ Yes ☐ No

BIS/16/262/RF