

## Response ID ANON-SEUV-HDD1-4

Submitted to **Teaching Excellence and Student Outcomes Framework: Subject-level**

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### Introduction

#### i What is your name?

**Name:**

Ashley Lenihan

#### ii What is your email address?

**Email:**

policy@bam.ac.uk

#### iii I am a:

Other (please state)

**Please state:**

Learned Society

#### iv If applicable, what is your organisation's name?

**Organisation:**

British Academy of Management

#### v Would you like us to keep your responses confidential?

No

**Reason for confidentiality:**

### Subject classification system

#### 1 To define 'subjects' in subject-level TEF, do you:

Yes - agree

#### If you answered No, what other systems could be used and why?:

Yes

#### If you answered Yes, please explain why.:

The British Academy of Management (BAM) welcomes the use of the second level of the Common Aggregation Hierarchy (CAH2) as the classification system to define 'subjects' for the purpose of the subject-level TEF. BAM is the leading authority on the academic field of management in the UK, supporting the community of scholars in this field and engaging our international peers. We have over 2000 members, more than three-quarters of whom are based in British institutions.

However, we believe that the method used to aggregate these 35 CAH2 subjects into 7 'subject groups' as currently proposed in Model B needs to be adjusted. This is because we do not feel that the 7 proposed subjects groups will prove useful for applicants considering Business and Management programmes.

Our primary concern is that the aggregation of Business and Law into a single 'subject group' creates a large pool of 336,270 students from two disparate subjects and will not provide detailed information for either unique group. According to HESA data, roughly 3 out of 4 students in this 'group' would be Business students alone. This creates a potential problem for applicants specifically searching for and finding information about the quality of teaching on specific courses in either business or law.

If Model B were to be adopted, we would strongly advocate that Business and Management should be a separate 'subject group' of its own.

### Duration of award

#### 2 Do you agree that we should have a longer duration and re-application period in subject-level TEF?

Yes - agree

**The focus of this question is on whether we should extend the duration. However, please provide as much detail as you can on your preferred length for the duration and/or re-application period.:**

We agree with the longer duration of at least 5 years, with re-application being possible after 2 or 3 years. The benefit of this is that the burden on institutions in

lessened, however, the currency of information could be called into question.

We would also suggest that greater clarity be provided about who can trigger the re-application process. We would expect an institution to re-apply at the earliest possible point if they have been given a low rating and their National Student Survey (NSS) results subsequently improve. Yet, it is unclear how the process would be triggered if an institution's NSS results decline during the award period.

## Overview of subject-level TEF design

### 3 Should subject-level TEF retain the existing key elements of the provider-level framework (including the 10 TEF criteria, the same suite of metrics, benchmarking, submissions, an independent panel assessment process and the rating system)?

Neither agree nor disagree

#### If you answered No, please explain why.:

While we agree that the same metrics should be retained on the whole, we would also note that the problems around some of these benchmarks have become clear and that it would be worth both supplementing them with additional qualitative measures and providing guidance on their use and understanding for students. For example, evidence shows that widening participation students are reluctant to move away from home, affecting their choice of institution (see Gibbons & Vignoles 2009. <http://cee.lse.ac.uk/ceedps/ceedp101.pdf>), which in turn may affect institutional benchmarks. Similarly, metrics around student outcomes at some institutions will be affected by the impact of regional difference in graduate salaries (see <https://www.timeshighereducation.com/news/how-big-englands-north-south-divide-graduate-salaries>).

In addition to existing metrics, we thus suggest that an element of peer review of teaching should be included in the subject-level TEF to offer a perspective from within each discipline. This would provide meaningful feedback that could form the basis for improvement. This recommendation is in line with the wider concerns around the importance of tempering such metrics with peer-review for accuracy and meaning. (See, e.g., 'The Metric Tide: Report of the Independent Review of the Role of Metrics in Research Assessment and Management' 2015. <http://www.hefce.ac.uk/pubs/rereports/year/2015/metrictide/>).

### 4 For the design of subject-level TEF, should the Government adopt:

An alternative approach (please specify)

**Please explain your answer. When answering this question, please consider the underlying principles that define Model A (a 'by exception' approach) versus model B (a 'bottom up' approach), and which principle you think we should adopt for subject-level TEF. While we are also interested in detailed comments on the specific design of each model, the final design will likely be a refined version of those presented in the consultation document. This question is therefore seeking views about which underlying approach you prefer. In your response, you may wish to consider the evaluation criteria set out in the specification for the first year of pilots (see below):**

We would suggest that Model B, a 'bottom up' approach should be used, but only if the 7 subject groupings are expanded to create a separate standalone 'subject group' for business and management. If this were to be done, then Model B would provide more granular detail for applicants as intended. Moreover, it is also likely that even if Model A were to be adopted, the equivalent data for Model B would still be prepared by providers for their own use and to inform the 'by exception' approach.

## Model A: Generating exceptions

### 5 Under Model A, do you agree with the proposed approach for identifying subjects that will be assessed, which would constitute:

Not Answered

**If you answered No, please explain why. You may wish to comment on variations or options that we have not mentioned:**

Not Answered

**Please explain your answer. You may wish to comment on options for identifying the number of additional subjects or on any variations or options that we have not mentioned.:**

## Model A: Relationship between provider and subject assessment

### 6 In Model A, should the subject ratings influence the provider rating?

Yes - agree

**Please provide as much detail as you can on why and how this relationship should be brought about.:**

Yes, subject ratings should influence the provider rating as long as this is done in a meaningful and valid way. As is stands, it is possible to have four subjects out of 27 rated at Bronze and have an institutional award of Bronze.

## Model B: Relationship between provider and subject assessment

### 7 In Model B, do you agree with the method for how the subject ratings inform the provider-level rating?

Neither agree nor disagree

**You may wish to comment on the method for calculating the subject-based initial hypothesis, as well as how this is used in the assessment process. We also welcome alternative approaches that do not use the subject-based initial hypothesis.:**

As Model B currently stands, the proposal is that provider level ratings would be made up of provider level metrics, the submission and the 7 subject group ratings.

However, the numbers of students within these subject groups varies greatly, and this will need to be addressed. For example, the current 'subject group' of Business and Law would account for 20% of all students. Yet, the number of Business students would normally far outweigh the number of Law students. In 2016/17, for example, there were 220,035 first degree students enrolled in Business and Administrative studies in the UK, and only 67,630 enrolled in Law (see <https://www.hesa.ac.uk/>). This means that the subject group weighting would be heavily influenced by Business and may not accurately reflect the experiences of either unique group of business or law students. This, in addition to the fact that these subjects are taught differently, adds to our concern that if Model B is adopted, Business and Management should be made into a standalone 'subject group.'

## Metrics

### 8 Do you agree that grade inflation should only apply in the provider-level metrics?

No - disagree

**If you are able, please provide information about how grade boundaries are set within institutions to inform whether our rationale applies consistently across the sector. Comments on the potential impacts of applying grade inflation only at provider-level are also welcome.:**

Grade inflation is a contentious concept, suggesting that there is a lack of consistency and agreement across the Higher Education sector. We would suggest that this is not an issue that should be addressed by TEF, particularly at the subject level. Rather, a robust system using existing processes of external examination and other quality assurance measures should remain in place as the means to deal with this.

### 9 What are your views on how we are approaching potential differences in the distribution of subject ratings?

**You may wish to comment on our approach to very high and low absolute values, clustered metrics and regulation by Professional, Statutory and Regulatory Bodies (PSRBs).:**

We acknowledge that benchmarks and distributions will vary across subjects and we would not support the introduction of pre-determined benchmarks. Business and Management programmes vary across the sector and this should be acknowledged in the mechanisms used to measure performance. The use of forced distributions would result in providers being awarded a performance rating that does not reflect the descriptor for that award.

### 10 To address the issue of non-reportable metrics:

Yes - agree

**If you answered No, please explain why.:**

follow an alternative approach (please specify)?

**Please explain your answer.:**

According to Figure 7 in the technical document supporting this consultation, around 27% of Business and Management subjects had non-reportable core metrics. It is most likely that in these cases, NSS scores are not reportable but there may be other data, such as DLHE, that are. If there is further detail available, our preference would be for that to be reported alongside group or provider metrics. Without further detail, we would recommend that data from the rest of the groups be used as this would be more useful from a student perspective to using institutional level data.

## Additional Evidence

### 11 Do you:

Yes - agree

**If you answered No, please explain why.:**

We agree that QAA subject benchmark statements and PRSB accreditation or recognition should be a voluntary declaration. It is appropriate for Business and Management schools to choose which accreditations best suit their profile and expertise and how this influences their programme offerings. A mandatory declaration would lead to a level of homogeneity that would be undesirable and against students' interest in this discipline.

No

**Please outline which subjects should have mandatory declaration and why.:**

## Interdisciplinarity

### 12 Do you agree with our approach to capturing interdisciplinary provision (in particular, joint and multi-subject combined courses)?

Neither agree nor disagree

**Please explain your answer. We want to ensure that providers are not discouraged from taking an interdisciplinary approach as an unintended consequence of subject-level TEF. We therefore welcome feedback on how the proposed approach will impact on providers and students.:**

From a cost effectiveness perspective, this appears to be the most sensible approach. However, it could also be mooted that students could be advised to look at

the scores for each discipline (e.g. Business + French; Business + Criminology etc) when choosing joint and combined courses.

## Teaching Intensity

### 13 On balance, are you in favour of introducing a measure of teaching intensity in the TEF, and what might be the positive impacts or unintended consequences of implementing a measure of teaching intensity?

No - disagree

#### Please explain your answer.:

On balance, we would not be in favour of introducing a teaching intensity metric for these subject-level pilots. Evidence suggests that increasing physical contact time between students and teachers does not necessarily lead to better teaching or outcomes (See, e.g. <https://www.timeshighereducation.com/news/teaching-intelligence-contact-hours-and-student-engagement/2002432.article>)

We understand that many students may use contact hours as a measure of value for money. However, we feel that – at least for the business and management field as a whole – such a measure over-simplifies the value of a course and detracts from the richness and range of learning opportunities that university students should be encouraged to engage in, such as peer-to-peer learning and university fostered and guided opportunities to learn skills and gain experience within industry or the private sector during their studies.

### 14 What forms of contact and learning (e.g. lectures, seminars, work-based learning) should and should not be included in a measure of teaching intensity?

#### Question 14:

Contact and learning takes many different forms in Business and Management schools. This can include, for example, sessions using Adobe Connect in which a student would engage in learning at home on their own. Traditional office hours are sometimes now being replaced or supplemented by Facebook Live sessions, and students can connect with staff and peers using a range of social media. There are new forms of contact and learning being introduced on a regular basis, making it difficult to list, classify and regularly update them all.

It should also be noted that many Business and Management programmes include a 'Year in Industry.' And, although there is little tutor contact, this is a valuable and vital form of learning for many students that can also improve outcomes.

The question of optional provision would also need to be addressed in any measure of teaching intensity. For example, study skills sessions, maths clinics and employer engagement events are provided on many programmes. Yet, they often do not form part of the formal timetable, making them more difficult to measure.

If it is determined that a measure of contact and learning must be included in the TEF, we would suggest that it might focus on learning opportunities and teaching quality rather than teaching intensity.

### 15 What method(s)/option(s) do you think are best to measure teaching intensity? Please state if there are any options that you strongly oppose, and suggest any alternative options.

#### Question 15:

Per the above, we would suggest an alternative measure of contact is adopted, which acknowledges the full range of learning opportunities and the responsibility of students to develop as independent learners and critical thinkers. Any such metric should address the quality of teaching and, again, this might be done through peer review in addition to quantitative methods.

Regarding the options put forward for measuring teaching intensity alone, we offer the following observations:

1. GTQ: As noted in the technical consultation document, this measure does not take account of independent learning or teaching quality.
2. Student survey: This measure could be subject to disruption (as with the NSS), and there is a risk of survey fatigue and misperception.
3. GTQ weighted by qualification: While this metric is intended to measure teacher quality, it is important to understand that the seniority of the lecturer is not a good proxy for quality.
4. A quantitative and qualitative measure of how students should spend their time: This metric appears complicated and would place an extra administrative burden on institutions. Transparency and comparability across providers could also be an issue.
5. A measure of engagement with teaching resources: This metric does not provide evidence of the quality of engagement.
6. Measure of staff contracted teaching hours: Many staff are contracted to engage in teaching, research and knowledge exchange, making this more difficult to measure than might be expected. Moreover, this again does not take into account independent learning or the quality of teaching.

## Other comments

### 16 Do you have any comments on the design of subject-level TEF that are not captured in your response to the preceding questions in this consultation?

#### Question 16: