

## Submission to the Independent Review of the TEF ‘Call for Views’

### Submission by Iain Mansfield

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## 1. Executive Summary

The strategic imperative of the TEF was to achieve long-term, systemic, cultural change of the higher education system, providing a permanent counter-balance to the distorting impact of the REF and its predecessors. This means creating a TEF that is embedded in a sustainable, consistent form, that does not change on an annual basis, focused upon the fundamental priorities of high quality teaching and strong student outcomes,

### Goals and essential elements

The two principal goals – driving up the standard of teaching and informing students – are fundamentally linked. The REF is responsible for allocating billions of pounds of research funding. If the TEF is to be an effective counter-balance to the REF, it must have a similar impact on matters of direct, material impact to providers. In the current higher education system of minimal grant and no student number caps, this can only be done by impacting reputation and thereby student choice. To ask which goal is more important is a false dichotomy: removing the ‘reputational and informing students’ element of the TEF would simultaneously destroy its ability to drive up the standard of teaching.

Though the details of TEF may change, there are a number of essential elements that are fundamental to achieving its goals. These are:

- ***Clear and meaningful differentiation with at least three different ratings.*** Only clear differentiation can deliver reputational impact and thus the incentive to improve teaching.
- ***Outcomes, not process, focused.*** This ensures that the results reflect and measure real-world outcomes.
- ***Metrics informed but not metrics determined.*** The strength of the TEF is in the interaction between the metrics and the panel’s judgement to deliver a balanced outcome.
- ***Benchmarking.*** Only by benchmarking can high-tariff and low-tariff providers be judged on a level playing field.

### The Review should restore simplicity to the TEF

The TEF has become overcomplicated. The Independent Review should aim to strip out unnecessary complexity and restore simplicity to the TEF, reducing the number of metrics to 5-6, eliminating supplementary guidance and removing little-used parts of the assessor guidance and contextual evidence. The strength of the TEF is in the panel and they should be trusted and empowered to deal with nuance, borderline cases and exceptions.

### Ratings and metrics

Although it is essential to retain clear, differentiated ratings, the names of these ratings are less important. If a decision was taken to move away from Gold, Silver and Bronze, it would be most conducive to public understanding if the rating names were aligned with those used by Ofsted.

The use of robust outcome-focused metrics is a fundamental element of TEF. The wider public rightly see completion rates and progression to highly skilled employment as important measures of university quality and it is entirely appropriate that they should form a major element of any performance framework.

Other significant observations with respect to the metrics include:

- There should be no more than five or six core metrics and no supplementary metrics.
- The NSS should ideally account for between a quarter and a third of the total metric weighting.
- All forms of further study, including progression to professional study, should be classed as positive outcomes.
- The time-period assessed by LEO should be moved to align more closely with that assessed by Graduate Outcomes.
- The grade inflation metric should be removed and other non-essential metrics, such the proposed metric on attainment gaps, should not be added.
- Absolute continuation rates lower than 90% and rates of progression to highly skilled employment or further study lower than 60% should attract an automatic negative flag.
- The differing ways in which providers relate to their regions mean there is no easy way to benchmark by region without introducing new distortions.

## **Subject TEF**

The principle behind implementing subject TEF remains valid. Performance by subject varies significantly within individual providers. Repeated research has shown that choice of subject is of high importance to applicants when choosing where to study and over 80% of applicants said that Subject TEF would be useful to them in choosing where to study.

Nevertheless, the cost/benefit analysis of moving to Subject TEF was predicated upon a methodology being found for Subject TEF that did not require the assessment of all subjects. The pilots have found that neither 'Model A' nor 'Model B' were suitable robust. However, the cost of implementing the currently proposed model, in which all subjects are assessed, is a matter of concern and does not meet Jo Johnson's commitment that the TEF would be 'proportionate and light touch, not big, bossy and bureaucratic'.<sup>1</sup>

I recommend that a minimum threshold be applied to Subject TEF, such that only subjects with more students than that threshold are assessed. The aim should be to ensure that (a) at least 80% of students in the sector should be in assessed subjects and (b) the number of submissions should be reduced to between 1000 – 1500. This would also address the concern that the reliability of the metrics and therefore judgements diminishes for small subjects.

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<sup>1</sup> [https://dera.ioe.ac.uk/26982/1/Teaching%20at%20the%20heart%20of%20the%20system%20-%20Speeches%20-%20GOV\\_UK.pdf](https://dera.ioe.ac.uk/26982/1/Teaching%20at%20the%20heart%20of%20the%20system%20-%20Speeches%20-%20GOV_UK.pdf)

Such a change could reduce the cost of assessment by 65%-80%, a saving of up to £28m, while still providing subject information to over 80% of students. The remaining students would continue to be able to rely on provider ratings. Such a change would make the cost significantly more affordable for both the taxpayer and the sector, whilst preserving the majority of the benefits of Subject TEF.

## 2. Strategic Imperative

The strategic imperative of the TEF was to achieve **long-term, systemic, cultural change** of the higher education system, providing a permanent counter-balance to the (by itself) distorting impact of the REF and its predecessors that has existed since the 1980s. The aim was to deliver a higher education system in which **a focus upon teaching, upon the interests of students and upon positive graduate outcomes is seen as an integral part of every provider's mission**. Where providers have a clear incentive not to put on poor quality courses on which too many students drop out and graduates are seen as valueless by employers, and where TEF ratings are viewed and used by providers, governors, applicants, parents and teachers as automatically as Ofsted ratings are today.

Achieving this means **creating a TEF that is embedded in a sustainable, consistent form, focused upon the fundamental priorities of high quality teaching and strong student outcomes**. Just as the Research Selectivity Exercise became the RAE and then the REF, modifying yet remaining consistent to its fundamental principles, to achieve systemic change the goal would be that, in 2050, a version of the TEF would still exist and be seen as integral to the landscape as the REF is today.

Although the changes to TEF in its early years have been necessary (indeed, in many cases, the reviews are mandated by legislation or pledged to Parliament) this cannot continue if TEF is to retain the confidence of the sector. **It is essential that the Independent Review produces a version of the TEF that can command long-term confidence and stability**, without changing each year to respond to either the latest hot-topic in the press or refinement of an official in the Office for Students. This does not mean that the TEF will never change again. Should TEF become embedded, a review approximately once a decade to adjust it to reflect the contemporaneous landscape is likely to be beneficial; however, such a periodic review is very different from annual adjustments.

## 3. The Goals of the TEF

As the Call for Views states, the two principal goals of the TEF are:

- To drive up the standard of teaching in higher education
- To provide students with more information about where they are likely to receive the best teaching and outcomes.

The Call for Views, reflecting wider discussion on this subject, appears to present the goals as if they were independent of each other. This reflects a fundamental misunderstanding in the relationship between the two goals. **Though each goal is important in itself, they are also fundamentally linked.**

The REF is responsible for allocating billions of pounds of research funding. **If the TEF is to be an effective counter-balance to the REF** in the minds of university boards and vice-chancellors, **it must have a corresponding impact on matters of direct, material impact to providers. In practice, this means either funding or student numbers.**

In the current, market-based higher education system, lacking either substantive teaching grant or student number caps, this can only be done by means of impacting reputation and thereby student choice. It is possible to imagine a different system, in which TEF ratings directly impacted teaching grant funding, eligibility for student finance, ability to recruit international students or student number caps (at either subject or provider level); however, this does not reflect the current HE system, nor has any minister shown serious appetite for introducing such a system. Absent such direct incentives, to ask which goal is more important is a false dichotomy: **removing the ‘reputational and informing students’ element of the TEF would simultaneously destroy its ability to drive up the standard of teaching.**

It is true that awareness of the TEF remains lower than ideal among applicants. The fact that only 15% of students used TEF to inform their decision should be placed in the context of (a) the relative newness of the TEF; (b) the fact that only 50% of parents use Ofsted ratings to inform choice (which might be considered an upper bound on what could hope to be achieved)<sup>2</sup>; and (c) the fact that subject TEF has not yet been implemented<sup>3</sup>. The currently low awareness of TEF suggests **an imperative on the OfS and DfE to do more to raise awareness of TEF, including via the schools system and careers advice**, not a reason to abandon that goal.

#### 4. Essential Elements

Though the details of TEF may change, there are a number of essential elements that are fundamental to the original vision and goals of the TEF and that should be preserved and maintained in prominence if it is to have the intended impact. In particular:

- ***Clear and meaningful differentiation with at least three different ratings.*** The TEF has ended the never-very-convincing fiction that every university (or course) is equally good.. Maintaining this is essential – switching to a ‘dashboard’ which just presented data would destroy its use in informing choice or in driving the needed improvement – indeed, such data already exists.
- ***Outcomes, not process, focused.*** By focusing on genuine, meaningful outcomes that students care about – and with clear guidance as to how performance impacts ratings – the TEF delivers results and differentiation that impact reality. Process-level assessments can be gamed until everyone passes; it can lead to a situation where everyone congratulates themselves on having excellent teaching, even while completion rates and progression to highly skilled employment continue to fall (the situation at too many providers under Higher Education Review). The TEF outcome metrics, whilst not perfect, reflect real world outcomes.
- ***Metrics informed but not metrics determined.*** The strength of the TEF is the balance between the metrics and the panel. The guidance and initial hypothesis supports the panel in making meaningful differentiation, but the panel’s ability to overrule the metrics on the basis of evidence makes the process more accurate and credible.

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<sup>2</sup> [https://www.teachertoolkit.co.uk/wp-content/uploads/2018/04/Ofsted\\_Annual\\_Parents\\_Survey\\_2017.pdf](https://www.teachertoolkit.co.uk/wp-content/uploads/2018/04/Ofsted_Annual_Parents_Survey_2017.pdf)

<sup>3</sup> Over 80% of applicants said that subject-level TEF would be useful to them in choosing where to study: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/717771/TEF\\_and\\_Informing\\_Student\\_Choice.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/717771/TEF_and_Informing_Student_Choice.pdf)

- **Benchmarking.** Only by benchmarking can high-tariff and low-tariff providers be judged on a level playing field. Benchmarking has meant that for the first time we have been able to meaningfully expose the tremendously variable performance between modern universities as well as between high-tariff providers. For modern universities, bench-marking removes the historic excuse that poor outcomes is simply due to taking disadvantaged students: bench-marking enables the comparing of like with like, and exposes the fact that some providers are achieving dramatically better outcomes for similar cohorts of students. At the same time, it has exposed 'coasting' high-tariff providers, where headline results that appear acceptable are actually significantly below those achieved by peer providers. The recognition of very high and very low absolute values is an important refinement that does not detract from the overall centrality of bench-marking.

## 5. Restoring simplicity to the TEF

A valid criticism of the TEF is that it has become over-complicated. It is possible to overstate this: **the TEF contains necessary complexity, such as benchmarking**, which is essential if providers are to be compared fairly. **But there is also, increasingly, too many unnecessary elements of complexity.** The increase in the number of different metrics to nine (five from the NSS alone) exemplifies this; however, the phenomenon also encompasses the use of supplementary metrics, different weightings and an increasing number of matters to consider by the panel and assessors. The trend began during my time working on this policy area and has continued since my departure.

The challenge for officials is that, in most cases, a change that introduces complexity will seem good and beneficial when judged on its own merits alone: 'this will make X slightly more accurate'; 'this will make allowances for a particular case of exceptions'. Complexity may also help to appease stakeholders, by demonstrating that their views have been reflected. It is only under the cumulative impact of such changes that the edifice becomes so complex that it ultimately collapses.

**The Independent Review should aim to strip out unnecessary complexity and restore simplicity to the TEF.** Rather than heaping epicycle upon epicycle, it should seek to remove what is not essential and not add further extraneous elements. In addition to simplifying the metrics, the Review should aim not add more supplementary codicils to the assessor guidance, or more contextual evidence, but should rather seek to simplify these and take out parts that are in practice not used by assessors. **The strength of the TEF is in the panel**, in the judgement of the experts assembled, **and they should be trusted and empowered to deal with nuance, borderline cases and exceptions** as they did so well in 2016/17.

Some specific areas where simplicity could be increased are addressed in *Metrics*, below.

## 6. Ratings

For the reasons set out above in '*Essential Elements*' and '*Goals of the TEF*', **it is imperative to retain clear, delineated differentiation between providers** (and, if subject TEF is introduced, for individual subjects) **in order to provide the appropriate incentive to improve teaching and outcomes.** A complex 'profile' such as is used in the REF would be appropriate if the profile was determining grant allocation; it would neither be suitable nor effective in impacting reputation and student choice.

**The exact names of the ratings are less important.** Gold, Silver and Bronze have the virtue of (a) having two years of embedding; (b) being immediately understandable and (c) lending themselves well to visual branding. However, other alternatives could also be effective. It should be recognised that it is not possible to simultaneously clearly communicate the quality of the lowest sector

**If the rating names were to be changed, the most straight-forward and effective approach,** in terms of both accuracy, simplicity and applicant understanding, **would be to align the ratings with those used by Ofsted:** Outstanding, Good and Improvement Needed. This would not be welcomed by the sector, but there is no good reason why we should be less transparent with the users of higher education providers than we are with the users of schools and hospitals.

## 7. Metrics

The use of robust outcome-focused metrics is a fundamental element of TEF and was explicitly reflected in the revised name, the Teaching Excellent and Student Outcomes Framework.

The argument that these do not directly relate to teaching rests on taking a peculiarly narrow definition of teaching. TEF has always explicitly taken a broad view of teaching, mirroring the teaching 'mission' of providers as covering all that they do for students and this has been reflected in all the specifications to date. Fundamentally, **the wider public rightly see completion rates and progression to highly skilled employment as important measures of university quality and it is entirely appropriate that they should be used,** appropriately bench-marked, in a performance framework.

In terms of statistical robustness, **the metrics are amongst the most robust used in government** and have been extensively tested and evaluated in the various reviews that have occurred to date. Compared to A-Level grades, for example, where 1 in 4 may be incorrect, measures such as non-continuation or progression to highly skilled employment are highly reliable. Furthermore, the metrics rightly do not determine the TEF rating, but simply inform the panel judgement.

I do not intend to discuss every aspect of the metrics, for there are a number of ways in which they could be used to achieve a suitable result. However, a number of important points are worth mentioning:

### 7.1 The National Student Survey

**The weighting placed upon the National Student Survey should be between a quarter and a third of the total metrics.** It is important for it to be included – the NSS remains the best measure of student views on teaching quality that we have, and it would be difficult to justify conducting an assessment of teaching without taking into account student feedback. However, given the known limitations of the survey (amply documented in numerous places), as well as the correlation between different scales, it is not appropriate for it to have too great an impact on the final result.

**To aid simplicity, the increasing number of NSS metrics should be combined into one or at most two aggregate metrics,** combining the different scales. These should continue to use results derived from the scales, as now, rather than the overall 'satisfaction' question. The results of the different scales could, if desired, be provided to assessors as contextual information, but would not form part of the core assessment.

## 7.2 Further Study

The decision in the 2018/19 subject pilots to alter the definition of 'further study' to 'higher study' appears unhelpful and has resulted in a large number of professional study destinations being classed as 'unsuccessful outcomes'. It is perhaps equally concerning that this has been presented as a technical, rather than a substantive change, and put in place without significant discussion or published analysis.

Professional study destinations have from the beginning been seen as positive outcomes under TEF. Accordingly, **employment metrics used in the TEF should class all further study as a positive outcome**, consistent with the approach for the assessment rounds in 2016/17 and 2017/18.

## 7.3 LEO and Timings

When considering employment outcomes, **there is a fundamental tension between using data that is relevant to the current teaching at the provider and allowing for the fact that some graduates may not immediately move into graduate employment**. There is no simple right answer to this question and any date of measurement will be a compromise.

At the time of LEO's introduction, there was a strong concern from the sector that the 6-month measurement of DLHE was too short, and a longer period was accordingly chosen for LEO, to provide a counterbalance. At the current time, driven perhaps in part by Graduate Outcomes moving to a 15 month sampling time, the balance of opinion appears to be shifting towards using a shorter time period for LEO. This would be reasonable and, indeed, **both LEO and graduate outcome metrics could be aligned at 15 months**.

More broadly, **while university should never be judged solely on earnings, it is entirely appropriate that the ability to achieve a threshold salary continues to be one component of a basket of metrics**, provided that it is appropriately benchmarked and contextualised. As is currently the case, the metric should track the proportion of students that achieve a threshold, deemed to be a proxy for a 'graduate job' and set below the starting salary for modestly paid professions such as nursing or teaching, rather than using median salary in order to minimise perverse incentives. Neither descriptive measures such as 'professional or managerial', nor earnings measures, provide a perfect proxy for a 'graduate job', but both capture some element of it, and using both will give a fuller and more complete picture than either alone.

## 7.4 Grade inflation, Attainment Gaps and other new metrics

Grade inflation is a clear and present danger for the higher education sector<sup>4</sup>: undeniably present, increasing and threatening the reputation and integrity of the UK degree. Nevertheless, including a metric is not the best way of dealing with this issue, which is better addressed through other means. Now that it has been tested, it is clear that, **the grade inflation metric is difficult to incorporate within the overall assessment**, adds non-essential complexity and detracts from the core focus of teaching and outcomes, **and therefore would ideally be removed**.

**Other non-essential metrics, such as the proposed new metric looking at attainment gaps, should similarly be removed from TEF**, not because the issues they are considering are not important, but because the TEF is not the best place to address them.

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<sup>4</sup> <https://wonkhe.com/blogs/grade-inflation-a-clear-and-present-danger/>

### 7.5 Very low absolute values

Students with different characteristics will, statistically speaking, tend to perform differently. This is why benchmarking is an essential element of TEF, by ensuring that TEF does not deter providers from taking students from disadvantaged backgrounds who have the ability to benefit from higher education.

Nevertheless, there comes a point where outcomes are sufficiently poor, at an absolute level, as to cast significant doubt upon a provider's performance. Outcomes below a certain level suggest *prima facie* that a provider is failing to either (a) exercise meaningful due diligence in admitting only students with the ability to benefit and/or (b) provide suitable support for the students once admitted. The 'low absolute values' threshold included in the current methodology does not address this point, as it fails to guard against behaviour by a number of providers in tandem, as might be prompted by the current demographic dip.

**Accordingly, performance below a certain absolute level should be automatically awarded a negative flag.** The exact thresholds should be determined through detailed analysis, but potentially a continuation rate below 90% or a progression to highly skilled employment of less than 60% would be suitable, albeit generous, thresholds<sup>5</sup>. As with other flags, the views of the panel would continue to determine the final judgement on ratings.

### 7.6 Regional dimension

As acknowledged by the Universities UK submission to this Call for Views, there is no easy way to account for regional differences via benchmarking, due to the different ways in which providers engage with their mission<sup>6</sup>. **It is almost impossible to devise a system of benchmarking which is simultaneously fair to both Teeside and Newcastle, or to both Bangor and APU.**

Given this, I continue to believe that the approach currently used in the TEF, in which assessors are provided with various pieces of contextual information and empowered to exercise their judgement is preferable, and superior to an attempt to create spurious accuracy through a system of calculations which would be likely to add as much unfairness as it would remove. This, however, is a question with no easy answers, and one on which reasonable people may reach different conclusions.

## 8. Subject TEF

I remain convinced in principle of the importance of implementing Subject TEF. We know from the metrics data that outcomes vary significantly across institutions, meaning that **moving to subject-level is highly desirable if the TEF is to be of most use to applicants.** Repeated research has shown

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<sup>5</sup> For comparison, the figures from the Year 4 TEF metrics for the University of Lincoln, a Gold rated modern provider, are 95.8% and 77.2% respectively, demonstrating by how much these thresholds can be exceeded by a provider with a high proportion of students from disadvantaged backgrounds.

<sup>6</sup> "A benchmark for the TEF is complicated by differing missions of providers in similar locations, resulting in various geographical recruitment patterns and onward employment." <https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/2019/future-of-the-tef-independent-reviewer.pdf>

that choice of subject is of high importance to applicants when choosing where to study and over 80% of applicants said that Subject TEF would be useful to them in choosing where to study<sup>7</sup>.

Some of the criticisms levied at Subject TEF are slightly mischievous, in particular the argument that the subject classification does not map perfectly on to providers' own subject groupings. Given that every provider uses a different internal structure, no classification system will be perfect – but that has not prevented subject classifications from being used effectively in areas as diverse as the REF, UCAS and subject league tables. Other concerns, however, are more well-founded, in particularly those regarding cost and burden.

**The cost/benefit analysis of moving to Subject TEF was predicated upon a methodology being found for Subject TEF that did not require the assessment of all subjects.** I do not dispute the findings of the Subject Pilot that neither 'Model A' nor 'Model B' were suitably robust. However, the cost of implementing the current model, in which all subjects are assessed, is undeniably a matter of concern.

The Office for Students has estimated that the cost to providers of implementing the new model would be £23.8m<sup>8</sup>. If the cost of assessment to the OfS is scaled up in a similar proportion, the cost to the government is likely to be over £10m<sup>9</sup>, **leading to a total cost to taxpayers of approximately £35m to assess all institutions.** The exact annual cost will be less than this, as awards last for several years; the exact cost will depend on how long TEF awards last and how frequently providers choose to reapply before the end of their award duration, but is likely to be somewhere between a sixth and a half of the total cost.

£35m every four to six years is not inherently unjustifiable when set against the cost of overseeing the £10bn+ of public money channelled through the student finance system. By comparison, the annual cost of Ofsted is just over £132m<sup>10</sup>, while the annual cost of administering the USS pension scheme is £125m<sup>11</sup>, both of which represent an annual cost around an order of magnitude higher than that of subject TEF. But it is not what was envisaged when Jo Johnson made the commitment that TEF would be 'proportionate and light touch, not big, bossy and bureaucratic'.<sup>12</sup>

One option would be delay the implementation of Subject TEF in order to undertake additional pilots and trial further models. However, the feedback from the 2017/18 pilots suggests that such a model would not be easily available. This would also have the disadvantages of further delaying the implementation of Subject TEF for students and keeping the TEF in a state of flux for longer, working against the aim of creating stability and certainty for the sector.

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/717771/TEF\\_and\\_Informing\\_Student\\_Choice.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/717771/TEF_and_Informing_Student_Choice.pdf)

<sup>8</sup> <https://www.officeforstudents.org.uk/publications/teaching-excellence-and-student-outcomes-framework-findings-from-the-first-subject-pilot-2017-18/>

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/727509/Regulatory\\_Framework\\_Final\\_Impact\\_Assessment.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727509/Regulatory_Framework_Final_Impact_Assessment.pdf)

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/725797/Ofsted\\_Annual\\_Report\\_\\_Accounts\\_2017-18\\_-\\_WEB-160718.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/725797/Ofsted_Annual_Report__Accounts_2017-18_-_WEB-160718.pdf)

<sup>11</sup> <https://www.bbc.co.uk/news/education-43157711>

<sup>12</sup> [https://dera.ioe.ac.uk/26982/1/Teaching%20at%20the%20heart%20of%20the%20system%20-%20Speeches%20-%20GOV\\_UK.pdf](https://dera.ioe.ac.uk/26982/1/Teaching%20at%20the%20heart%20of%20the%20system%20-%20Speeches%20-%20GOV_UK.pdf)

Instead, I recommend that a minimum threshold be applied to Subject TEF, such that only subjects with more students than that threshold are assessed. Based on information in the public domain, we know that there is a 'long tail' of very small subjects – for example, the smallest third (by student population) of subjects contain only 3.5% of students<sup>13</sup>. The exact level of the threshold should be determined by analysis, but the aim should be to ensure that (a) at least 80% of students in the sector should be in assessed subjects and (b) the number of submissions should be reduced to between 1000 – 1500, ideally towards the lower end of that figure.

Assuming a linear cost distribution, such a change could reduce the cost of assessment by 65%-80%, a saving of up to £28m, while still providing a strong focus on driving up teaching and providing useful information to over 80% of students. The remaining students would continue to be able to rely on provider ratings. Given that baseline quality assurance is provided by the OfS and that TEF provides assessment above the baseline, it is difficult to justify spending an additional £28m of taxpayers' and university's money to secure full coverage, particularly given that the statistical reliability of assessments is known to decrease on the smallest courses. Such a change would be significantly preferable to abandoning Subject TEF in its entirety, and would be a proportionate means of addressing the sector's concern in this area.

### **About this submission**

*This submission is made by Iain Mansfield in a personal capacity.*

*Between 2015 and 2018 I was the senior official in the Department for Education with principal responsibility for the development of the TEF. The views set out in this submission are entirely my own and should not be considered to be those of my current employer, former employer, or any other organisation in the higher education sector with which I have either a formal or informal association.*

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<sup>13</sup> [https://www.officeforstudents.org.uk/media/eb11e5e1-b74e-4695-bdeb-6362bbb04a88/ofs2018\\_43\\_.pdf](https://www.officeforstudents.org.uk/media/eb11e5e1-b74e-4695-bdeb-6362bbb04a88/ofs2018_43_.pdf)