

Response ID ANON-SEUV-HDB4-5

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

Submitted on **2018-05-21 11:04:42**

Introduction

i What is your name?

Name:

Robert Ashcroft

ii What is your email address?

Email:

robert@the-ies.org

iii I am a:

Charity or social enterprise

Please state:

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

Organisation:

Institution of Environmental Sciences (and the Committee of Heads of Environmental Sciences)

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:

Neither agree nor disagree

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

In principle, we support the use of the CAH2 classification system, but feel that certain important adjustments are necessary to make the system functional in relation to particular disciplines.

Yes

If you answered Yes, please explain why.:

The Institution of Environmental Sciences (IES), and its education committee, the Committee of Heads of Environmental Sciences (CHES), has undertaken a simple mapping exercise of the environmental science programmes which we accredit. Under the CAH2 system, these programmes would be split across several subject areas, with a large number being placed in the 'Geography and environmental studies' category (as indicated by HESA's mapping of JACS codes against the CAH categories).

We feel that the inclusion of the environmental sciences in this group could cause difficulties for benchmarking and assessment, particularly under Model B, in which case this subject area would be considered part of the Social Sciences group. It would be inappropriate for the environmental sciences to be considered or assessed as part of the social sciences, where teaching methods vary significantly.

Environmental science should be assessed as part of the Natural Sciences group under Model B. Even if Model A is adopted, we would support an adjustment to the categories to ensure environmental science programmes are being assessed as part of a subject category which reflects their scientific nature and underpinning.

Our first preference would be the creation of a new subject category (nested under the natural sciences), which aligned more closely with the system used under the Research Excellence Framework (REF) where 'Earth systems and environmental science' were grouped together. This system would be more transparent and informative for students seeking to study an environmental science programme.

Alternatively, environmental science could be included in an amended existing group, falling within the natural sciences group, but this would not be our favoured option.

Duration of award

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

Not Answered

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.:

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)?

Not Answered

If you answered No, please explain why.:

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

Not Answered

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).:

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?

Not Answered

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

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?

Not Answered

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.:

Metrics

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

Not Answered

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.:

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 support the proposal to allow ratings to vary naturally between subjects, rather than impose a forced distribution for each subject.

10 To address the issue of non-reportable metrics:

Neither agree nor disagree

If you answered No, please explain why.:

We recognise the difficulties involved in assessing subject-level performance where limited data is available, for instance where cohorts are too small for metrics to perform reliably. However, it should be recognised that in some cases small programmes can deliver a very high standard of teaching and students outcomes, and failing to recognise this performance could negatively affect student's perception and therefore recruitment.

As such, although a threshold will be necessary to ensure metrics and ratings are reliable, the system should recognise the impact this may have on small programmes, and where possible seek to include them in assessment exercises. Where this is not possible, appropriate explanations and guidance should be issues to students and institutions to ensure the lack of assessment is not misrepresented.

Not Answered

Please explain your answer.:

Additional Evidence

11 Do you:

Neither agree nor disagree

If you answered No, please explain why.:

PSRB accreditation plays an important role in improving and demonstrating the standard of teaching and student outcomes on degree programmes. In particular it can provide subject-specific information and assurances about standards of teaching (for instance, in environmental science, accreditation from the IES indicates a suitable quantity of fieldwork is included in the programme). As such, we believe declaring any PSRB accreditation would improve a TEF submission, and assist assessors. Institutions should be encouraged to include this information in their submissions.

However, we currently do not have a view on whether this declaration should be made mandatory; further information about how this information would be used would help us to reach a conclusion.

Not Answered

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)?

Not Answered

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.:

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?

Neither agree nor disagree

Please explain your answer.:

We have been unable to form a conclusion on this point, and have been disappointed to see some sections of the debate around teaching intensity become politicised. Teaching which adds value can take a great variety of forms depending on the discipline in question. Further evidence and analysis is required regarding the impact such a measure could have on student outcomes and experience, considering a full range of forms of teaching, and potential unintended consequences (for instance, the possibility to increasing 'gaming' of the system, or decreasing flexibility and student choice), so we are not taking a position on this point.

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:

If a measure of teaching intensity is included in the subject-level TEF, it is essential that this measure recognises the importance of fieldwork as a core element of teaching in the environmental sciences and related disciplines.

Fieldwork must be included in any future measure of teaching intensity, and if the assessment progress allows, benchmarking for relevant disciplines should take its importance into account in any weighting of different forms of teaching. It is vital to recognise that different forms of teaching and learning and appropriate to different subjects and disciplines.

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:

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:

We would like to highlight that this is a joint submission from the Institution of Environmental Sciences (IES), and its education committee, the Committee of Heads of Environmental Sciences (CHES). In our response we have focused on questions which explicitly concern our discipline, rather than institutional questions best addressed by other groups.