SRHE Draft Response to Office for Students Consultation on the future approach to quality regulation – November 2025

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Question 1a: What are your views on the proposed approach to making the system more integrated?

It should be a basic requirement of any quality system that it adheres to international standards on quality assurance. The vague commitment to "work towards applying to join the European Quality Assurance Register for Higher Education at the appropriate time" is inadequate and would raise serious questions about the credibility of the OfS's expertise to lead on the assessment of quality across the English Higher Education system.

Given this, it is particularly troubling that the consultation implies that the meeting of this basic requirement would lead to increases in the cost of the TEF for individual institutions: "There could also be additional costs, and therefore higher fees for providers, involved in adhering with European standards and guidelines".

We also note that the proposal also promises more agile "risk monitoring," but doesn't spell out what indicators trigger scrutiny or how providers/students can challenge errors quickly.

The substantial and widely respected work of the TEF Independent Review (2021) should be fully considered and its recommendations used to inform this approach.

REFERENCES:

The TEF Independent Review (2021) Independent Review of the Teaching Excellence and Student Outcomes Framework (TEF): Report to the Secretary of State for Education August 2019. https://www.gov.uk/government/publications/independent-review-of-tef-report.

Question 1b: Do you have views on opportunities to reduce duplication of effort between the future TEF and Access and Participation Plans?

It is a mistake to focus on 'duplication' between the future TEF and APPs because this positions them as examining separate aspects of an institution's provision. It would make more sense to focus on the alignment between the future TEF and APPs and to ensure that they address issues of equality of access and participation in a consistent way and, where appropriate, using the same sources of data. This would support the development of an integrated system-wide approach to quality and equality of access and participation whereas focusing on reducing duplication of effort would reinforce a sense of separation and inconsistency between the future TEF and APPs.

The danger of moving consideration of access and participation to the TEF is that the TEF is an extremely broad-brush measure of educational quality (Ashwin 2022). It doesn't have the capacity to offer a meaningful fine-grained consideration of issues of access and participation. The predictable consequence is that issues of access and participation will be overlooked in the TEF due to a primary focus on offering some measure of quality.

There was significant overlap reporting on APP statistics on admission, progression, continuation and completion in the Provider Submissions for Student Outcomes. Efforts to recruit diverse students, decrease awarding gaps and address other gaps across student characteristics should be clearly reported and managed within the APP process, or the TEF (but not both, or neither). See: https://www.qaa.ac.uk/docs/qaa/members/educational-gain-project-report.pdf?sfvrsn=7301b981_6

Ashwin, P. (2022). Developing effective national policy instruments to promote teaching excellence: Evidence from the English case. *Policy Reviews in Higher Education*, *6*(1), 27-45.

Stevenson, J and Kandiko Howson, C (2024) QAA Educational Gain Collaborative Enhancement Project Report. https://www.qaa.ac.uk/docs/qaa/members/educational-gain-project-report.pdf?sfvrsn=7301b981_6

Question 2a: What are your views on the proposal to assess all registered providers?

It only makes sense to assess all registered providers if the measures used to assess quality are fair and valid measures of educational quality for all providers. There are serious questions about whether the metrics used in the TEF offer a valid measure of educational quality when there are only a relatively small number of cases informing the score on each metric. These questions would call into doubt the validity and fairness of the judgement of the TEF panel which would have the potential to undermine the credibility of the TEF. The proposals for assessing providers without sufficient data reinforce this concern because it is in no way equivalent to the metrics used to assess other providers. This is likely to mean that judgements of small providers end up oscillating between overly generous and overly harsh because they are not based on robust data and instead are largely informed by the OfS's guidance about how to handle such cases. This gives the OfS an inappropriate amount of power in these situations and is likely to lead to complaints from providers who feel they have been unfairly penalised relative to other institutions who are assessed using different methods.

Question 2b: Do you have any suggestions on how we could help enable smaller providers, including those that haven't taken part in the TEF before, to participate effectively?

The OfS should accept that the TEF does not offer the kind of fine-grained judgements that are needed to fairly and validly assess small providers. Given this, it makes no sense to include them in the TEF and the OfS should find another way to assess these kinds of institutions.

Question 3a: Do you have any comments on what provision should be in scope for the first cycle?

The OfS needs to develop an effective TEF for undergraduate education before seeking to extend it to other forms of provision, including apprenticeships.

Question 3b: Do you have any comments on the proposed approach to expanding assessments to include taught postgraduate provision in future cycles?

The OfS needs to develop an effective TEF for undergraduate education before seeking to extend it to other forms of provision, including taught postgraduate provision.

Question 4a: What are your views on the proposal to assess and rate student experience and student outcomes?

It is a mistake to reject the idea of evaluating how effective providers are undertaking quality improvement. The reasons given of the added bureaucracy and not providing useful additional information to students are misleading in a number of ways. Most importantly, the TEF itself does not tell students anything about the quality of the particular programme they will study because every institution has programmes of variable quality (Ashwin 2022). Therefore, it is already unclear what the TEF award actually signals and this is reflected in evidence of students' understanding of the TEF (Tredance UK 2017; DfE and UCAS 2019; Vivian et al. 2019; TEF Independent Review 2021). Whilst the consultation suggests that the YouthSight (2022) report indicates that respondents found the TEF ratings to be clear, this is a misleading statement. The YouthSight (2022) report considers how clear respondents found the current TEF ratings compared to other potential ratings. At no point were respondents asked what the ratings actually told them about the educational quality offered by different institutions. Thus the report only shows whether respondents understood the difference between the TEF categories rather than whether they understood of the meaning of each category.

A more valid and comprehensible signal for the TEF to send is that it provides a measure of how effectively institutions use metrics to enhance the quality of their provision. This could be done in combination with minimum thresholds set for institutions' performance on the metrics. This would provide prospective students with a much clearer indication of what the TEF actually can measure. It would also have the benefit of providing institutions with an incentive to link their approaches to quality enhancement to the metrics used in the TEF (Ashwin 2022).

Ashwin, P. (2022). Developing effective national policy instruments to promote teaching excellence: Evidence from the English case. *Policy Reviews in Higher Education*, *6*(1), 27-45.

DfE (Department for Education) and UCAS (2019). *Research to Support the Independent TEF Review: Surveys of HE Applicants*. https://www.gov.uk/government/publications/research-to-supportthe-independent-

review-of-tef-surveys-of-he-applicants/research-to-support-the-independenttef-review-surveys-of-he-applicants .

The TEF Independent Review (2021) Independent Review of the Teaching Excellence and Student Outcomes Framework (TEF): Report to the Secretary of State for Education August 2019. https://www.gov.uk/government/publications/independent-review-of-tef-report.

Trendance UK (2017). Teaching Excellence: the Student Perspective. A Report Commissioned by a Consortium of Students' Unions. London: Trendance.

Vivian, D., A. James, D. Salamons, Z. Hazel, J. Felton, and S. Whittaker (2019). Evaluation of Provider-Level TEF 2016-17 (Year 2): Measuring the Initial Impact of the TEF on the Higher EducationLandscape. London: Department for Education.

YouthSight (2022) Assessing student perceptions of proposed TEF naming and rating options: A report for the OfS. London: YouthSight.

Question 4b: Do you have any comments on our proposed approach to generating 'overall' provider ratings based on the two aspect ratings?

The rule-based overall provider rating would be misleading to prospective students. This is because having a separate overall provider rating implies that this is based on additional information not covered by the other two ratings. However, it is not. It is simply telling prospective students the lowest rating the provider received, which is already evident from the two ratings. To use the overall provider rating in this way would serve to undermine the credibility of the TEF by creating unnecessary noise without providing any additional relevant information.

Question 5a: What are your views on the proposed scope of the student experience aspect, and how it aligns with the relevant B conditions of registration?

As discussed in more detail under 5c, the problem with the student experience aspect is that the OfS is seeking to scale-up programme-level measures to assess institutional quality. It has long been recognised that such measures cannot be scaled up in this way either at a conceptual or methodological level (for example, Elton 1998; Marsh et al. 2011; Callender et al. 2014; Ashwin 2022).

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Elton, L. (1998). Dimensions of excellence in university teaching. *The International Journal for Academic Development*, *3*(1), 3-11.

Marsh, H. W., Ginns, P., Morin, A. J., Nagengast, B., & Martin, A. J. (2011). Use of student ratings to benchmark universities: Multilevel modeling of responses to the Australian Course Experience Questionnaire (CEQ). *Journal of Educational Psychology*, *103*(3), 733.

Question 5b: What are your views on our initial thoughts on the criteria for the student experience rating (at Annex H)?

The criteria for the student experience rating are misleading for prospective students because course level descriptions cannot be used to meaningfully provide an institutional level assessment (Elton 1998; Marsh et al. 2011; Callender et al. 2014; Ashwin 2022). For example, the criteria for Gold imply that every programme in an institution will be of the highest quality. There is no evidence that this has ever been true for any institution regardless of size. Every institution has programmes of higher and lower quality. Therefore, in a large number of cases, prospective students across the English HE system will be misled about the quality of the particular degree programme that they will study.

There is also a lack of clarity on how 'consistency' will be applied fairly across institutions that vary immensely in breadth and size. A large institution may have a single outlying department that is larger than half of the institutions in the exercise. This vastly favours smaller institutions that can use their whole provider submission to address small variations, compared to a large institution having to address every course, split by student characteristics, mode of study.

We also note that the 'Resources, support and student engagement' section of Annex H appears to be focused entirely on academic support, rather than pastoral and/or peer support, and would suggest consideration of other support factors which affect student experience (and especially the experience of marginalised students), such as sense of belonging and sense of mattering. Annex H also utilises two senses of the phrase 'student engagement' - the sense of 'students engaging with their own learning' versus 'student voice, co-creation and partnership'. This is potentially confusing and should be carefully delineated.

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Question 5c: What are your views on the evidence that would inform judgements about this aspect?

The NSS was explicitly designed to offer comparisons at the course level and to compare courses in similar subject areas. It is methodologically inappropriate to use the NSS to compare whole providers (Richardson et al. 2007; Callendar et al. 2014) and such instruments cannot meaningfully differentiate between institutions (Marsh et al. 2011). This is particularly important as there is clear evidence on subject-based variation in the kinds of measures that make up the NSS (Kember & Leung 2011), which is likely to mean that the subject-mix of institution distorts their outcomes on these measures.

Given the 10 year plan for the work outlined in the consultation (with planning and several cycles mapped out), better indicator development should be factored in. Using the NSS because it is currently available is not the answer – it is not a suitable instrument for the purposes being proposed and the stakes aligned to it. As noted in our response to Question 4a: "A more valid and comprehensible signal for the TEF to send is that it provides a measure of how effectively institutions use metrics to enhance the quality of their provision. This could be done in combination with minimum thresholds set for institutions' performance on the metrics. This would provide prospective students with a much clearer indication of what the TEF actually can measure. It would also have the benefit of providing institutions with an incentive to link their approaches to quality enhancement to the metrics used in the TEF (Ashwin 2022).".

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Callender, C., Ramsden, P., & Griggs, J. (2014). *Review of the national student survey: Report to the UK Higher Education Funding Bodies*. London: Higher Education Funding Council for England.

Kember, D., & Leung, D. Y. (2011). Disciplinary differences in student ratings of teaching quality. *Research in higher education*, *52*(3), 278-299.

Marsh, H. W., Ginns, P., Morin, A. J., Nagengast, B., & Martin, A. J. (2011). Use of student ratings to benchmark universities: Multilevel modeling of responses to the Australian Course Experience Questionnaire (CEQ). *Journal of Educational Psychology*, *103*(3), 733.

Richardson, J. T., Slater, J. B., & Wilson, J. (2007). The National Student Survey: development, findings and implications. *Studies in Higher Education*, *32*(5), 557-580.

Question 6: Do you have any comments on our proposed approach to revising condition B3 and integrating the assessment of minimum required student outcomes into the future TEF?

Integrating the assessment of B3 conditions into the future TEF runs the risk of the OfS becoming too slow to act in situations where providers suffer a rapid and catastrophic

deterioration in their educational quality. The current financial climate in English HE makes it particularly inappropriate for the OfS to make this proposal at this time.

Question 7a: What are your views on the proposed approach and initial ratings criteria for the student outcomes aspect?

The outline benchmarking process for student outcomes is opaque and does not provide any reassurance that the range of factors that explain differences in outcome that are unrelated to the quality of students' education will be properly accounted for. It is not clear how the difficulties of measuring student outcomes for underrepresented and disadvantaged groups where there are small numbers included in the data will be taken into account.

Question 7b: Do you have any comments on the proposed set of employment and further study indicators, and are there other measures that we should consider using?

The proposals do not address the wide concerns about the limitations of LEO data as a measure, which the OfS itself acknowledges in other contexts. It seems contradictory to continue with flawed metrics that are known to privilege certain kinds of institutions but to drop learning gain because it is too difficult to work with when all institutions are included in the TEF. It is notable that various questions from the Graduate Outcomes survey were rejected because the OfS "view is that there are too many additional factors beyond a provider's control that could impact answers to these questions, so it would not be appropriate to use such measures in ratings judgements". This is notable because the same is true of all the outcome measures that the OfS proposes to use in relation to the Outcomes aspect of the TEF.

The TEF Independent Review (2021) highlighted the importance of learning gain as an outcome, and efforts should be made to develop a framework for reporting,not on replacing it with salary data.

The TEF Independent Review (2021) Independent Review of the Teaching Excellence and Student Outcomes Framework (TEF): Report to the Secretary of State for Education August 2019. https://www.gov.uk/government/publications/independent-review-of-tef-report.

Stevenson, J and Kandiko Howson, C (2024) *QAA Educational Gain Collaborative Enhancement Project Report*. https://www.qaa.ac.uk/docs/qaa/members/educational-gain-project-report.pdf?sfvrsn=7301b981_6

Question 7c: What are your views on the proposal to consider a limited set of contextual factors when reaching judgements about this aspect?

Very little justification is provided for limiting the set of contextual factors to be taken account of when making judgements. This proposal appears to be focused on making the TEF administratively efficient but it is likely to reduce its effectiveness and its validity.

Question 8a: What are your views on who should carry out the assessments?

There should be diverse panels across all protected characteristics, and including academics and students from varied provider types with varied individual backgrounds. A training programme should be developed to train assessors in the specific contexts of small and specialist providers; they do not need to be currently working in them to understand quality in HE. OfS staff should not be on assessment panels that are meant to provide institutional peer review and student feedback.

Question 8b: What are your views on only permitting representations on provisional rating decisions of Bronze or Requires improvement?

In order to demonstrate the OfS' commitment to ensuring that TEF judgements are made in an open and transparent manner, there should be the right to appeal any judgement made by the TEF panel. There is no justification stated for not allowing appeals for Institutions awarded TEF Silver, and this is likely to undermine the credibility of the TEF assessments.

Question 9a: What are your views on our proposal for an alternative means of gathering students' views to inform the student experience aspect where we do not have sufficient NSS-based indicators?

The proposal for alternative means of gathering student views of the student experience could completely undermine the TEF as a valid measure of student experience. The suggestion that an online meeting or a commissioned focus group provides a sufficient insight into student provision across an institution is unconvincing. The proposal that a provider could be awarded overall Gold on the basis of a single focus group (as would appear possible in cases where there are insufficient outcomes data) would devalue the currency of the TEF.

Question 9b: What are your views on our proposal not to rate the student outcomes aspect where we do not have sufficient indicator data?

The notion of statistical confidence is misused when discussing the issue of sufficient data. That a certain percentage of outcomes fall between two categories in no way provides a measure of statistical confidence. This would misrepresent the validity of the judgements made. The position on sufficient statistical confidence also makes no sense given that educational quality can only be meaningfully measured at the level of individual programmes rather than at an institution (Elton 1998; Marsh et al. 2011; Callender et al. 2014; Ashwin 2022).

Given it is well established that the same institution can have programmes of very different quality, to require that 90% of an institution's position relative to their benchmark for any indicator falls within two categories will completely miss providers who have highly variable quality across their courses. This may inadvertently privilege these institutions by having indicators excluded that could reduce their overall TEF rating. While this may make the assessment of the data more efficient for panels it will be at the cost of undermining the validity of the TEF's measurement of these aspects of quality. Rather than undermining the validity of the TEF, the OfS needs to accept that there is a clear minimum amount of data that is required for TEF ratings to be meaningful. As we have noted elsewhere in this response, institutions with insufficient data should be excluded from the TEF.

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Question 10a: What are your views on our proposed approach to including direct student input in the assessment of the student experience aspect for all providers?

Student input should be mandatory and required of all providers and should align with global and national standards for quality assurance. An OfS-commissioned focus group cannot be considered to provide adequate access to the diversity of student experiences in a particular institution, particularly as it is very likely that students with either very positive or very negative experiences of their provision will be the most motivated to attend a focus group.

It is also misleading to suggest that "The views of students are also embedded in the TEF through their role as student assessors". This not a way of incorporating students' views of the quality of their education any more than having assessors who work in higher education institutions provides a way of embedding the views of staff in the TEF. This gives an inflated sense of student involvement in the TEF – what is required are robust mechanisms that will provide a real measure of student views.

Question10b: How could we help enable more student assessors from small, specialist and college-based providers to take part?

The OfS could target potential student assessors from small, specialist and college-based providers and offer them greater support and training to undertake their role. However, for this to be successful the TEF would need to be perceived as a valid measure of quality in these contexts. The approach to dealing with small providers make it less likely that the TEF will be perceived in this way with a greater chance of arbitrary outcomes based on a small number of student focus group discussions and small providers subject to greater fluctuations in students' outcomes as each individual outcome represents a higher proportion of the provider's overall outcome.

Question 11a: What are your views on our proposed approach to scheduling providers for their first assessments?

The proposed approach to scheduling providers wrongly focuses on the situation of individual providers rather than examining the consequences for measuring educational quality of the make-up overall sample. In order to undertake meaningful assessments of quality, each round of the TEF needs to include a sample of providers that covers the potential variation in quality. This is because the TEF ratings are by the very nature expressions of relative quality. Therefore each category gains its meaning based on its differences from other categories. Prioritising providers with Bronze award in Year 1 and providers with Silver and Gold in Years 2 and 3, risks unfairly rewarding or penalising those institutions in the first year of the TEF. The approach requires a rethink to take account of the consequences of each year's sample for measuring educational quality.

Question 11b: What are your views on our proposed approach to scheduling providers for subsequent assessments?

The scheduling of providers for future assessments depends on what use is made of the TEF outcomes. If TEF awards are the basis on which providers are allowed to increase their undergraduate tuition fees in line with inflation, then the proposed scheduling is highly problematic. This is because students in an institution with a Gold award will have their tuition fees increased based on measures of educational quality from six years previously, which would represent a measure of quality a minimum of nine years before they graduate. Given the instability of the English Higher Education system, there is a high degree of likelihood that quality will have changed over this time in a number of institutions. If, after the five years, the institution was subsequently awarded TEF Bronze then this would raise questions about whether students should receive a refund on the inflation-related aspects of their fees given that this would indicate that they had received a lower quality education. This is just one illustration of the ways in which linking TEF outcomes to increases in tuition fees will undermine the TEF as a trusted measure of educational quality.

Question 12: Do you have any comments or evidence about the factors associated with risks to quality that might be included in the draft risk monitoring tool at Annex I?

The factors identified make sense as risk factors associated with individual programmes. However, it is far less clear that they will work as risk factors at an institutional level. For example, significant changes in staff-student ratios or student recruitment at a programme level could easily be concealed by changes in the subject-mix across an institution.

Question 13: Do you have any comments about the proposed set of incentives and interventions associated with TEF ratings?

The use of incentives and interventions for providers with a Bronze TEF rating could be extraordinarily damaging, with limits on student numbers, ineligibility for future funding, and, if introduced by the DfE, the inability to raise their home undergraduate tuition fees with inflation. This would be a draconian set of 'punishments' for being given a Bronze TEF rating. A predictable outcome is that TEF panels will be reluctant to give Bronze TEF awards and they will simply become the equivalent of 'Requires improvement'. It is not clear that the OfS has the power to prevent this without an inappropriate intervention in the work of the expert panels.

There are three further issues with using TEF outcomes to allow providers to increase their home undergraduate tuition fees in line with inflation. First, the TEF does not measure the quality of individual degree programmes. It evaluates, in a fairly broad-brush way, a whole institution's approach to teaching quality and related outcomes (Ashwin 2022). All institutions have programmes of variable quality; this means that linking tuition fees to TEF outcomes could lead to significant numbers of students on lower quality programmes being charged the higher rate of tuition fees. This is clearly unfair.

Second, the TEF does not give any indication of the quality of education that students will directly experience. Rather, when they are applying for their degree programme, it provides a measure of an institution's general teaching quality at the time of its last TEF assessment which could be up to five years previously. This would mean it gives a view of educational quality at least nine years before applicants will graduate. Even if it was from the year before they enrol, it will be based on an assessment of evidence that took place at least four years before they will complete their degree programme. New students will be charged the higher rate of tuition fees as a result of a general quality of education enjoyed by their predecessors.

Third, the higher the stakes in the TEF, the more institutions will feel forced to game the system. This problem has long been recognised in relation to performance indicators in higher education (Elton 2004). In the current state of financial crisis, institutional leaders are likely to feel under huge pressure to game the TEF to ensure the highest possible tuition fee income for their institution given that it could make the difference between institutional survival, a forced merger or the potential closure of their institution. This would make the TEF even less of an effective measure of educational quality and much more of a measure of

how effectively institutions can play the system. Institutions with the greatest resources will be in by far the best position to finance the playing of such games. Making the stakes so high for institutions would also remove any incentive for them to use the TEF as an opportunity to openly identify educational excellence and meaningfully reflect on their educational quality. This would mean that the TEF loses any potential to meet its core purpose, identified by the TEF Independent Review (2021) "to identify excellence and encourage enhancement". It will instead become even more of a highly pressurised marketing exercise with the TEF outcomes having potentially profound consequences for the future survival of some institutions. Institutions may also consider legal action in response to the judgements made by the TEF which will serve to highlight even more clearly that the metrics underpinning the TEF judgements do not provide a valid measure of quality at the level of the institution

Given these challenges, a TEF set up along these lines is very unlikely to be sustainable.

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Elton, L. (2004). Goodhart's Law and performance indicators in higher education. *Evaluation & Research in Education*, *18*(1-2), 120-128.

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Question 14a: What are your views on the range of quality assessment outputs and outcomes we propose to publish?

The only useful outputs for prospective students are those which tell them about the quality of the programme they are considering to study. Providing information about institutional level quality is misleading because it tells prospective students nothing about the educational quality of the programme that they will study. If the OfS wants to provide useful quality assessment outputs and outcomes then it will need to find ways of providing these at the level of individual programmes or subjects.

Question 14b: Do you have any comments on how we could improve the usefulness of published information for providers and students?

The QAA and Advance HE already provide useful resources on effective educational practices. We would recommend that the OfS build better relationships with these bodies to develop its expertise in meaningfully identifying examples of effective practices. However, more importantly, meaningful examples of effective practices are not situated at an institutional level because what constitutes an effective educational practice is dependent on the students, the programme of study, and the context in which the programme is being studied. To offer generic descriptions of 'best practice' at an institutional level is unlikely to support the further development of effective practices. Those who are interested would be

better off examining the institutional submissions, which would be the only source of such examples, and considering which practices appear to have resonance for their own situation.

Question 15: Do you have any comments on the proposed implementation timeline?

The timeline strongly suggests that the OfS is expecting to roll out the TEF in a form very similar to that presented in this consultation. However, it is our view that there are major issues with the validity of what is proposed. At its heart the major problem with the OfS proposed approach is that it wants to use measures of educational quality that are meaningful at a programme level and scale these up to an institutional level. However, it has long been known that you cannot scale up judgements of programme level quality to institutional level quality (Elton 1998; Marsh et al. 2011; Callender et al. 2014; Ashwin 2022) This has always been a difficulty for the TEF, but was of far less significance when the TEF was used as a broad exercise related to institutional reputation. In this consultation, the OfS is signalling that it wants to change the TEF so that it has significant material consequences for institutions. The problem with this, and the timetable, is that the form of measurement offered by the TEF is not robust enough to provide valid or convincing evidence to justify these consequences. The OfS appears to have ignored the substantial and widely respected work of the TEF Independent Review (2021) and have proposed a TEF that will not be sustainable. The greater the consequences for institutions, the more likely they are to take extended legal action against the TEF mechanism which the TEF is simply not equipped to deal with. The proposals in this consultation suggest that the OfS does not appreciate the limitations of the proposed TEF as a measure of educational quality.

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Question 16: Do you have any comments on the two options we have set out for how we could approach publication of TEF ratings during the transitional period, or suggestions of other approaches we could take?

It would be better to keep as much information as possible open to prospective students.

Question 17: Do you have any comments on our approach to ongoing development, or our plans to prepare for the future inclusion of taught postgraduate provision?

The severe problems that we perceive to face the proposed TEF suggests that it would be far better to focus on getting a system that is right for undergraduate education before seeking to extend it further.

Question 18: Are there aspects of the proposals you found unclear?

What is unclear in the proposals is whether the OfS understands the nature of the measurements that underpin the TEF metric and the extent to which they can support robust judgements of institutional level educational quality.

Question 19: In your view, are there ways in which the objectives of this consultation could be delivered more efficiently or effectively than proposed here?

As outlined in the previous responses, it is our view that the proposals here cannot be delivered efficiently or effectively. The OfS needs to redesign its approach to quality with a far greater research-informed understanding of the nature of educational quality at an institutional level and how it can be validly measured. We have referred throughout this consultation response to the substantial and widely respected work of the TEF Independent Review (2021), and would recommend that this report be fully considered in this context.

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