Ed Humpherson, Director General for Regulation

Iain Bell
Director for Data and Education Standards Analysis
Department for Education
Sanctuary Buildings
20 Great Smith Street
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23 February 2017

Dear Iain,

I am writing to you about correspondence we have received recently about data informing the core metrics being used in the assessments of higher education institutions through the Teaching Excellence Framework (TEF) (Year 2).

Concerns have been expressed with regards to the potential unreliability and bias in the compilation of the National Student Survey (NSS) data, either structurally or due to behaviours in the answering of survey questions. We have been asked as a consequence whether we believe the data is sufficiently robust to inform core metrics of the TEF Year 2 assessment. Whilst recognising that NSS data are not official statistics and therefore on the margins of our remit, principles that apply to official statistics can still be looked at in this context.

We recognise that you sought to identify potential issues and concerns with using NSS as a TEF metric, plus any wider issues, through running the TEF year 2 technical consultation in conjunction with BIS (as was) in 2016[1].

Published responses included one from the Royal Statistical Society that highlighted potential issues. In addition, we are aware that BIS[2] also commissioned the ONS Methodology Advisory Service (MAS) to produce a short report reviewing the quality, robustness and suitability of the data sources being used which concluded with a set of six recommendations for improvement. Specifically, it made recommendations in the areas of data collection, coverage, non-response, potential for inference and stakeholder engagement[3].

Particular concern has been raised to us that there is a risk that the TEF will place too much weight on this survey data given the concerns about the robustness of the data, and that the results of the NSS have an inappropriately high bearing on the assessments of teaching quality made in the TEF. In response to similar concerns raised in relation to the Higher Education and Research Bill, we note that Viscount Younger of Leckie, as Lords

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[1] https://www.gov.uk/government/consultations/teaching-excellence-framework-year-2-technical-consultation
[2] The Department for Business, Innovation and Skills which was the department responsible for higher education before machinery of government classes
[3] https://www.gov.uk/government/publications/teaching-excellence-framework-review-of-data-sources

Spokesperson for Department for Education (DfE) has sought to assure peers that 'the TEF is not wholly metrics based, and most certainly not all about the National Student Survey. The NSS is just one of three principal sources of metrics data being used, and we have explicitly said that the NSS metrics are the least important'[4].

In addition, we note that the letter from Viscount Younger also makes clear that other evidence in addition to the core metrics will be used by TEF assessors in order to reach a holistic judgement. We also recognise that a number of the points raised by the ONS and the RSS refer to the overall satisfaction question (Q22) of the NSS and that, in recognition of this, the TEF is making no use of this question, instead using questions which relate more directly to teaching and learning.

Finally, we note that the government will conduct a lessons learned exercise into the first trial year of the TEF and that the findings of this will inform the operation of the TEF in 2018.[5]

With this in mind, there are two areas that DfE should ensure it has addressed:

i)   Review the published guidance on the approach the UKSA expects to see in the production and presentation of official statistics where the data are used to measure performance or achievement against targets. Although in this case NSS data is not official statistics, the seven actions that we have identified that can enhance the public value of official statistics should be considered in the use of data to support the TEF performance metrics in terms of:

    a. Developing performance measures to support policy making
    b. Understanding the data underlying the performance measure.
    c. Communicating – about the data, the performance measures and the messages in the statistics.
    d. Sharing good practice.

ii)   Ensure that the recommendations included in the published ONS MAS report of June 2016 and the concerns raised by the RSS in their TEF consultation response in July 2016 have been addressed and published along with other TEF documentation and guidance.

Yours sincerely

Ed Humpherson

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[4] http://data.parliament.uk/DepositedPapers/files/DEP2017-0067/Letter_from_Viscount_Younger_to_Peers_re_HER_Bill.pdf
[5] http://www.wired-gov.net/wg/news.nsf/articles/Universities+opt+in+to+the+Teaching+Excellence+Framework+30012017081056