Department for Business, Innovation and Skills consultation: Fulfilling our Potential: Teaching Excellence, Social Mobility and Student Choice

15 January 2016

Written evidence submitted by Dr Maren Deepwell, chief executive, on behalf of the Association for Learning Technology, registered charity number 1160039.

Executive summary

1. ALT is making this submission as a membership body, representing as members over 1750 individuals and 180 organisations, including universities, colleges, government departments, agencies, and software, hardware, and e-learning businesses from across the UK;

2. Our response is focused on questions that are directly related to ALT's remit as a professional body for Learning Technology and its role in Higher Education, but we note that the wider issues discussed here are likely to have a big impact on many of our members;

3. For the Teaching Excellence Framework we recommend that thinking around excellence take into account the central role of Learning Technology[1] for learning, teaching, assessment and, increasingly, employment. While we appreciate the need for any standards of excellence to provide flexibility, we feel that in today's conditions it should be a minimum requirement to have considered Learning Technology as a dimension of any practice. This would strengthen the ambition set out and help ensure that all future frameworks are appropriately future-proof;

4. In common with other professional bodies such as the National Association of Teaching Fellows, we welcome the aim to recognise excellence in teaching and the value of professionalism. In relation to Learning Technology in particular, recognition for professional practice in teaching and assessment is not as strong as we would like to see, and one of ALT's key strategic aims is to further professional recognition and reward. In regard to evidence and how to measure

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[1] https://www.alt.ac.uk/about-alt/what-learning-technology

teaching excellence we would like to see the inclusion of professional accreditation schemes such as CMALT[2];

5. Within our membership, as in other communities, there is a consistent concern that the metric-based approach proposed will not be appropriate to measure all aspects of teaching excellence, and in relation to use of technology in particular there is great variance in reporting and usage. Our Annual Survey[3] helps underline the broad spectrum of implementation and practice;

6. If a single regulatory framework were to be introduced we would strongly recommend that acknowledgement of the role of Learning Technology in delivering high quality student experience and outcomes be included in its quality assurance;

7. We suggest that in order to fulfil its proposed duties the Office for Students would also need to have effective relationships with professional and scholarly bodies across subject areas and include these in its governance. Professional bodies could provide a cost-effective and efficient way for such a body to establish itself quickly and support its aims.

About the Association for Learning Technology (ALT)[4]

8. Founded in 1993, ALT is a Charitable Incorporated Organisation (CIO), registered charity number 1160039. We are the UK's leading membership organisation in the learning technology field. Our purpose is to ensure that use of learning technology is effective and efficient, informed by research and practice, and grounded in an understanding of the underlying technologies, their capabilities, and the situations into which they are placed;

9. We do this by improving practice, promoting research, and influencing policy, through bringing together practitioners, researchers, and policy-makers in learning technology as set out in our current strategy[5];

10. ALT is making this submission as a membership body, representing as members over 1750 individuals and 180 organisations, including universities, colleges, government departments, agencies, and software, hardware, and e-learning businesses from across the UK;

11. ALT's members are at the forefront of delivering teaching and training of the current and future workforce including digital and data literacy.

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[2] https://www.alt.ac.uk/certified-membership
[3] https://www.alt.ac.uk/about-alt/what-we-do/annual-survey
[4] https://www.alt.ac.uk
[5] https://www.alt.ac.uk/about-alt/what-we-do/alt-strategy

Submission

Public sector equality duty

Question 1:
a) What are your views on the potential equality impacts of the proposals and other plans in this consultation?
b) Are there any equality impacts that we have not considered? If so, please provide any further relevant evidence.
No response.

Teaching Excellence Framework

Question 2: How can information from the TEF be used to better inform student and employer decision making? Please quantify these benefits as far as you can.
Response:
Firstly, careful use of data is central: the use of data, including student outcomes data, provides a useful indication of trends and helps to identify any systemic issues, and thus feeds into continuous improvement activities. However, metrics are not the only evidence used by institutions for quality assurance and developing improved student learning opportunities. Institutions will obtain qualitative feedback from students throughout their higher education and this information is widely used for quality assurance and enhancement purposes. Hence there are concerns about a potentially excessive emphasis on these types of metrics. Some of the information is influenced by factors that are external to the university (e.g. UK graduate employment is influenced by a range of external factors including the economic situation within the country and this will influence DLHE outcomes), and therefore caution is needed in how this type of information is used as an indicator of quality in higher education.

In addition we recommend that wider use of metrics, including (predictive) learning analytics and assessment metrics, is developed in the context of the guidance for the ethical use of student data[6] and to ensure more effective transparency of complex systems which produce the data used for metrics outlined in the consultation.

Question 3: Do you agree that the ambition for TEF should be that it is open to all HE providers, all disciplines, all modes of delivery and all levels? Please give reasons for your answers.
No response.

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[6]

http://www.open.ac.uk/students/charter/essential-documents/ethical-use-student-data-learning-analytics-policy and also JIsc's Code of Practice for Learning Analytics
https://www.jisc.ac.uk/guides/code-of-practice-for-learning-analytics

Question 4: Where relevant, should an approved Access Agreement be a pre-requisite for a TEF award? What other mechanism might be used for different types of providers?
No response.

Question 5: Do you agree with the proposals on:
d) what would constitute a 'successful' QA review
e) the incentives that should be open to alternative providers for the first year of the TEF
f) the proposal to move to differentiated levels of TEF from year two?
Please give reasons for your answer.
Response:

d) *In our view there is a risk of changing the current QA system to be more bureaucratic than we require as DAP institutions. There is a danger that we are messing with systems that serve no purpose for the students.*
e) *It is not entirely clear what the benefits of opening up DAPs for alternative providers are, other than creating a business out of education.*
f) *If moving to differentiated levels, how can we ensure that we don't penalise institutions that don't have the funding to compete with bigger more successful institutions? Will funding be provide to ensure equity?*

Question 6: Do you agree with the proposed approach, including timing, assessment panels and process? Please give reasons for your answer.
Response:
The HE sector in the UK is well established and the current arrangements have helped to ensure that UK HE is well respected across the world. There is a need to ensure that, as the sector moves to the next phase and subsequent implementation of a new/revised approach, the collective knowledge and expertise of staff across HE is retained and developed in order to maintain stability and continuity in the sharing of good practice. In particular in the area of Learning Technology, both student expectations and practice develop rapidly and have increasing impact on wider developments.

Question 7: How can we minimise any administrative burdens on institutions? Please provide any evidence relating to the potential administrative costs and benefits to Institutions of the proposals set out in this document.
Response:
There are already robust policies and processes in place at sector and institutional level to monitor and manage quality assurance; our recommendation would be that these are further developed to embrace the managing and monitoring of educational practice more fully. For example, institutions are required to complete a comprehensive Self-Evaluation Document as part of the periodic Quality Audit, and this mechanism could be reviewed and revised to ensure appropriate issues in relation to the TEF; impact case studies developed for the REF could be adapted to show institutional impact linking the best of

evidence-based practice with pedagogic practice; benchmarks could be established, such as staff membership of professional bodies (such as ALT's CMALT[7] scheme and others).

Question 8: Do you agree with the proposed approach to differentiation and award as TEF develops over time? Please give reasons for your answer.
Response:
In relation to this question the key concerns raised by our membership are:
It is problematic to band HEIs based on teaching overall because this may not relate to individual students' experiences of individual programmes, which may be excellent;
How will it work in a practical sense? There is a need to understand constructive feedback from students, some of which may appear negative, but is intended to generate improvements at the micro level. However if this is interpreted by others as 'poor teaching' there is the concern about reputational damage and even programme closure.
The implications from policy makers and others thus far are that the TEF would compare HEIs with each other by providing a national 'ranking'. Whilst this may have some advantages, it also risks unfair comparisons, and concerns have been raised across the sector by VCs concerned about the 'brand' of UK Higher Education becoming devalued: if, say, only 10 HEIs are judged as 'excellent', will this supports the existing notion of a hierarchy of (elite) UK universities?

Question 9: Do you agree with the proposed approach to incentives for the different types of provider? Please give reasons for your answer.
No response.

Question 10: Do you agree with the focus on teaching quality, learning environment, student outcomes and learning gain? Please give reasons for your answer.
Response:
The ambition for the TEF is framed by thinking in terms of what "we mean by excellence". We strongly recommend that thinking around excellence take into account the central role of Learning Technology[8] for learning, teaching, assessment and, increasingly, employment. While we appreciate the need for the flexibility any standards of excellence must provide, we feel that in today's conditions it should be a minimum requirement to have considered Learning Technology as a dimension of any practice. This would strengthen the ambition set out and help ensure that all future frameworks are appropriately future-proof.
In addition, we refer below to the central role of professional bodies such as ALT in peer-accreditation of professional practice and development mapped to the UKPSF, and this type of recognition again could contribute to a more sustainable way of measuring teaching excellence.
We would also like to refer to the broader context, for example the use of Open Educational Resources, their development and sharing through Creative commons licensing.
In 2007, the OECD analysed the emergence of OER in its book, Giving knowledge for Free. A new publication, Open Educational Resources: A Catalyst for Innovation,

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[7] https://www.alt.ac.uk/certified-membership
[8] https://www.alt.ac.uk/about-alt/what-learning-technology

supported by a grant from the William and Flora Hewlett Foundation, takes stock of where we are in 2015[9]. The most immediate benefit of OER is the open (through open licenses) and free (in most cases at no cost) access to quality teaching and learning materials, often in multimedia formats. We suggest that the TEF consider aspects of practice such as use of OERs as part of its wider framework.

Question 11: Do you agree with the proposed approach to the evidence used to make TEF assessments - common metrics derived from the national databases supported by evidence from the provider?
Please give reasons for your answer.
Response:
In common with other professional bodies such as the National Association of Teaching Fellows, we welcome the aim to recognise excellence in teaching and the value of professionalism. In relation to Learning Technology in particular, recognition for professional practice in teaching and assessment is not as strong as we would like to see, and one of ALT's key strategic aims is to further professional recognition and reward.
In regard to evidence and how to measure teaching excellence we would like to see the inclusion of professional accreditation schemes such as CMALT[10]. CMALT is mapped to the UKPSF[11] and is one of the longest established accreditation schemes for Learning Technology, operating since 2005. In our experience assessing the effectiveness or quality of Learning Technology use for learning, teaching and assessment is difficult to do within set standards because of the rapid pace of innovation. Thus a peer-based assessment and accreditation scheme is a sustainable way of assessing practice. We have also introduced a regular update process to ensure assessors' practice is updated[12].
Within our membership as in other communities there is a consistent concern that the metric-based approach proposed will not be appropriate to measure all aspects of teaching excellence, and in relation to use of technology in particular there is great variance in reporting and usage. Our Annual Survey[13] helps underline the broad spectrum of implementation and practice.

We have not responded to questions 12 - 16 as they fall further outside our area of expertise.

Provider exit and student protection

Question 17: Do you agree with the proposal to introduce a requirement for all providers to have contingency arrangements to support students in the event that their course cannot be completed? Please give reasons for your answer, including evidence on the costs and benefits associated with having a contingency plan in

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[9] http://oecdeducationtoday.blogspot.fr/2015/12/opening-up-to-open-educational-resources.html#sthash.s07ELLNg.dpuf
[10] https://www.alt.ac.uk/certified-membership
[11]

https://docs.google.com/document/d/1vmeo7bGhAQRCs7ylt3JN0J1GVYJvpOdnop9LyB64Ui4/edit?usp=sharing
[12] https://www.alt.ac.uk/certified-membership/cmalt-portfolio-review
[13] https://www.alt.ac.uk/about-alt/what-we-do/annual-survey

place? Please quantify these costs where possible. Simplifying the higher education architecture

No response.

Question 18:
a) Do you agree with the proposed changes to the higher education architecture? Please give reasons for your answer.

Response:

While we agree broadly with the aims to set out in the paper, we are cautious about the disruption major changes to the architecture of the system would bring. If established, we recommend that the Office for Students include in its brief consideration of Learning Technology related skills, skills development, student expectations and innovation. We are concerned in particular that support and development for teaching staff working in partnership with students needs to be at the heart of ensuring quality and consistency.

b) To what extent should the OfS have the power to contract out its functions to separate bodies?

Response:

Learning Technology changes rapidly and in order to promote research and improve practice for students institutions need support at all levels, from senior leaders to teaching and support staff. A body such as the Office for Students should be enabled to make effective use of working in partnership with professional bodies such as this Association in order to meet its objectives.

c) If you agree, which functions should the OfS be able to contract out? d) What are your views on the proposed options for allocating Teaching Grant? Please give reasons for your answer

No response.

Question 19: Do you agree with the proposal for a single, transparent and light touch regulatory framework for every higher education provider? Please give reasons for your answer, including how the proposed framework would change the burden on providers. Please quantify the benefits and/or costs where possible.

Reponse:

If a single regulatory framework were to be introduced we would strongly recommend that it should include in its quality assurance acknowledgement of the role of Learning Technology in delivering high quality student experience and outcomes.

Question 20: What steps could be taken to increase the transparency of student unions and strengthen unions' accountability to their student members?

No response.

Question 21:
a) Do you agree with the proposed duties and powers of the Office for Students? Please give reasons for your answer.

Response:

We would like to suggest that in order to fulfill its proposed duties the Office for Students would also need to have effective relationships with professional and scholarly bodies across subject areas and include these in its governance. Professional bodies could provide a cost effective and efficient way for such a body to establish itself quickly and support its aims.

b) Do you agree with the proposed subscription funding model? Please give reasons for your answer.
Response:
We would strongly suggest that the funding model also takes into account how non-provider bodies, e.g. professional or membership bodies such as this Association, become stakeholders. In previous examples this kind of funding model focuses governance only on those organisations who are subscribers.

We have not responded to questions 22 - 28 as they fall further outside our area of expertise.

Further evidence
We are available to provide further evidence to the Select Committee.
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