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. Learning Technology has a major role to play in delivering high quality HE Learning and Teaching and in the definition and processes of any Teaching Excellence Framework (TEF). It can help to improve quality, facilitate quality processes, provide accountability and key data for stakeholders, reduce bureaucratic burden, and make improved processes affordable and cost effective. It can also support agile changes, but can also hinder them if used inappropriately. Because of the rapid pace of change in Learning Technology, it is important that any TEF framework be reasonably generic and regularly reviewed;
3. Understanding of Learning Technology issues by senior managers so that they are considered and built into culture is crucial to quality. Through initiatives such as HEFCE’s “Changing the Learning Landscape”1 where ALT was a partner in delivery, and through the passage of time, that understanding is increasing;
4. Nevertheless there is still a significant deficit in knowledge and skills of Learning Technology by many responsible for and involved in delivery of learning and this can lead to patchiness in provision within and between deliverers, at a time when consistency of approach is reported as strongly valued by learners. It is therefore important that knowledge and skills be accredited and levels reported through the KIS as well as used in any TEF framework. Surprisingly there can also be large knowledge and skills deficits amongst learners and this could also be the subject of

1 http://goo.gl/DwZfns
5. A supportive TEF has to stand on good educational principles. There would be advantages for staff and for HEIs but above all for learners who need to be fully involved in definition and in delivery and we suggest that intelligent use of Learning Technology is explicitly incorporated into all frameworks from now on;

6. The relationship with the proposed quality framework should not be a problem as the latter is increasingly threshold driven and the TEF will not be. It is important that the TEF be accepted as a UK wide system as that will reinforce the strong UK brand in worldwide HE;

7. Ensuring that the TEF encourages appropriate support and development provision and recognition for teaching staff in particular in the area of Learning Technology including digital and data literacy.

About the Association for Learning Technology (ALT)

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;

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.

Submission

What issues with quality assessment in Higher Education was the Higher Education Funding Council for England’s (HEFCE) Quality Assurance review seeking to address?

12. These are stated clearly in their consultation document which briefly mentions aspects of Learning Technology as one driver for changed processes (trend b)). The consultation responses support the importance of the area and suggest changes in learners as well as offerings in the area. A ten year horizon was suggested for the appropriateness of the resulting processes but the timescale was also questioned. It might have been helpful if there were more on improvement but that reflects the sector and the questions asked. Certainly it is vital that the UK brand remains a very

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2 https://www.alt.ac.uk
3 https://www.alt.ac.uk/about-alt/what-we-do/alt-strategy
The existing code is an very good set of guidelines and recognises the importance of Learning Technology up to a point. The code is something that gives the UK a clear advantage. There will be an inevitable tension between updating and/or expanding the code over time and ensuring that the current code is met. The Learning Technology area is one which is likely to need updating more often (as with other technology areas). It will also increase in importance. It is not yet clear that sufficient expertise is available for this ongoing updating and drafting in the Learning Technology area;

Thus, in practice Learning Technology is likely to be a much bigger driver than was anticipated and could have been included in many aspects including external examining, agility, reliability of information on experiences and so forth. There is clear evidence that Learning Technology continues to be important for HE teaching and assessment as for example ALT’s Annual Survey\(^4\) shows.

Will the proposed changes to the quality assurance process in universities, as outlined by HEFCE in its consultation, improve quality in Higher Education?

Learning Technology is an area that benefits from more standardization and collaboration. Not all HEIs will be comfortable with that. The point that collaborative arrangements are currently viewed as especially risky is relevant here. One example of supporting collaboration and knowledge exchange are the Special Interest Groups supported by ALT around themes such as MOOCs or Open Education\(^5\);

The increased use of data analytics, following the success of the NSS and other instruments, is identified but needs more support from technology to get better quality data. Technology and Learning Technology especially can provide rich mineable data on learner and teacher performance. Institutions should be devising strategies to collect such data and use it more systematically to inform quality processes as well as ensuring learners clearly understand what data is collected and how it is used. The same data can then be used be used in assuring the processes and supporting learners and teachers to utilise it responsibly. We support the principles of the Open University’s guidelines on the ethical use of student data\(^6\);

To give an example most HEIs currently have lecture capture systems in place. These are not used in a uniform way and much is left to the individual academic. Data analysis to identify students at risk and academics who lead to abnormally high or low usage is performed in some institutions and could be routine but currently is not. One example of input from ALT Members on this topic is their recent input to a Jisc consultation on a Code of Practice for learning analytics\(^7\).

What should be the objectives of a Teaching Excellence Framework (’TEF’)?

a. How should a TEF benefit students? Academics? Universities?
b. What are the institutional behaviours a TEF should drive? How can a system be designed to avoid unintended consequences?
c. How should the effectiveness of the TEF be judged?

\(^4\) [https://goo.gl/oGkw9F](https://goo.gl/oGkw9F)
\(^5\) [https://goo.gl/YQIN5x](https://goo.gl/YQIN5x)
\(^6\) [http://goo.gl/dzQb5f](http://goo.gl/dzQb5f)
\(^7\) [http://repository.alt.ac.uk/2361](http://repository.alt.ac.uk/2361)
19. The ultimate objective of a TEF needs to be to improve the quality and effectiveness (including cost effectiveness) of HE delivered across the UK and to give professional recognition to those who teach in HE for their work;

20. Subsidiary objectives could include improving the already high perception of UK HE across the world, providing to stakeholders additional data with which they can make informed decisions, and providing leverage to persuade HEIs to standardize more, individually and together;

21. As with the NSS, students are likely to be major beneficiaries of a sensitive system. Even though no money depended directly on the NSS, the scale that has had the biggest effect was “assessment and feedback”. In the 10 years of NSS there have been major advances in this area in most HEIs which would almost certainly not have happened without the NSS. This has often involved technology. NSS in its early years also illustrates some of the problems of a non UK wide system on the brand;

22. Academics will engage with processes if they foresee a personal gain. If the TEF brings pressure to work as part of a team delivering learning, especially if staff development is involved, then it will have a beneficial effect on learning;

23. Quality is a team activity as is Learning Technology standardization and this concept often leads to difficulty with individual academics. To date this has often been carefully finessed by HEIs and funders but the TEF is likely to bring it into stronger focus. Quality is also an area more generally associated with sticks than with carrots and a carefully configured TEF could redress that in part and help to re-motivate some faculty who feel that their attention to quality T&L has been largely ignored by their institution;

24. It is important that skills sets appear in the KIS. Thus if there were accreditation through UKPSF or, in the case of Learning Technology, CMALT which is mapped to the UKPSF, then reporting the accreditation profile of departments and institutions is likely to gain traction fairly quickly;

25. Universities will benefit individually if they “do well” and generally as part of the system if it helps to improve the perceived quality delivered overall. As with the NSS they are likely to resent and challenge it as an imposition in the first instance and thought needs to be given as to how that is to be overcome;

26. The most obvious institutional behaviours that could be driven include reinforcing the need for staff development and especially ongoing CPD, having good mechanisms, including Learning Technology ones, to encourage standardization in delivery, having good systems in place to identify and deal with aberrations (student, academic or process), and possibly changes in reward patterns for all staff better to reflect L&T activities. Again technology has a role to play on identifying whether such changes have taken place;

27. Any TEF should be judged through the data it produces, especially through the modified NSS and other data provided to stakeholders such as retention, achievement and destination through a modified KIS. One would expect to see national improvement and some correlation between improvements and TEF standing. This will itself require sophisticated analysis perhaps best performed by HESA. Again the student body’s involvement with processes is key.

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8 https://goo.gl/IQQtS
How should the proposed TEF and new quality assurance regime fit together?

28. The new quality assurance regime is about providing threshold standards and a regime of testing. We do not have a strong view on frequency and whether that should be a function of the HEI involved except to note that the leaders in Learning Technology do not always align with those overall and so any system must take account of such differences.

29. By contrast the TEF should be precisely that - identifying and reporting excellence and helping to enhance HEIs individual and collective standing. Again there is a role for technology. Innovation and enhancement are likely to play a bigger role and this is certainly the case with Learning Technology;

30. It is important to note that while Learning Technology presents challenges as rapid technological developments require an agile and iterative approach, the values and aims of delivering excellence in HE do not change and we suggest that intelligent use of Learning Technology is explicitly incorporated into all frameworks from now on.

What do you think will be the main challenges in implementing a TEF?

31. Defining a framework that is stable, accepted and widely applicable. The funding councils have skills in this area but will need to work hard (and together) to succeed. Good testing and piloting are vital for this purpose and the Learning Technology area (and others) will need individual treatment;

32. Making sure that the system is sufficiently robust to withstand legal and other challenges. This again argues for agility, testing, piloting and technology support;

33. Minimizing any new data that is needed to drive the system and using that from the quality framework and output metrics as much as possible. Using technology to derive one set of data from another rather than have separate collection of similar datasets. This also helps to guard against subtle changes in the data put forward to enhance an institutional profile;

34. Ensuring that the TEF encourages appropriate support and development provision and recognition for teaching staff in particular in the area of Learning Technology.

How should the proposed connection between fee level and teaching quality be managed?

a. What should be the relationship between the TEF and fee level?

b. What are the benefits or risks of this approach to setting fees?

35. Slowly but firmly. To be accepted by all stakeholders, the system must be worked through. Haste is likely to lead to derision. It is important to make sure that the proposal stands on solid foundations.
Further evidence
We are available to provide further evidence to the Select Committee. Please contact:

Dr Maren Deepwell
chief executive
Association for Learning Technology

01865 484 405
maren.deepwell@alt.ac.uk

Association for Learning Technology
Gipsy Lane
Headington
Oxford OX3 0BP