

- 1) To what extent do you agree with our proposal for provider-level, periodic ratings? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

We agree that rating should be conducted at a provider level and periodically. It is our belief that rating individual subjects would be too labour and time intensive, while TEF panels would not be qualified to appropriately assess the teaching on each subject. Arts teaching is already a specialised subject, with different learning outcomes and career aspirations for our graduates, in comparison to more traditional academic degree subjects, and therefore it is better that providers are assessed holistically.

We support our institution's belief that there should be check-in points midway through a rating cycle, most appropriately at the two-year mark, for providers who have received the lowest rating. This will work to ensure that progress is being made, and bespoke advice can be offered to those providers, to ensure they will reach their maximum potential at the end of the four-year cycle under the ratings scheme.

- 2) To what extent do you agree with our proposal for aspects and features of assessment? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

In principle, we agree with the separation of student outcomes and student experiences as underpinning the way in which providers will be assessed.

- 3) To what extent do you agree with our proposal for the rating scheme? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view**

We agree with the naming convention of 'Gold', 'Silver' and 'Bronze' as these can be universally understood. However, we believe if they were to be improved upon, we think a ratings system that more explicitly articulates that providers who have received these ratings have all exceeded minimum standards would be better. There is sometimes an assumption that 'Bronze' indicates poor quality, whereas it merely means it has not exceeded the minimum standards as much as other providers.

- 4) To what extent do you agree with our proposal for where there is an absence of excellence? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

We agree there should exist a category below 'Bronze'; however, we feel that a category name such as 'meets minimum requirements' would be more appropriate than 'absence of excellence'. We do not feel that providers who have met minimum requirements set by the OFS should be described as not possessing excellence, as there may well be good practice within that institution that is deemed excellent by many students, however they have failed at that time to put in place enhancements beyond those minimum standards. We are also concerned that such

a negative label would create detrimental impressions for providers (and the broader UK higher education sector) around the world, and have a negative impact on career prospects of graduates from that provider.

**5) To what extent do you agree with our proposal for provider eligibility? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

We agree that provider eligibility should be dependent on satisfying all requirements of relevant home nation to allow for standardisation.

**6) To what extent do you agree with our proposal for courses in scope? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

We agree with the proposal for the inclusion of courses in scope. We particularly welcome the inclusion of all students registered by the provider, including those involved in partnership agreements, as a disincentive for providers to build partnerships solely with a profit motive in mind. We believe this will encourage providers to think carefully about the building of partnerships, and consider the student experience at those partner-providers more thoroughly.

**7) To what extent do you agree with our proposal for provider submissions? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

We agree with the inclusion of provider submissions, and believe significant weight should be attached to these submissions, especially in relation to small and specialist institutions for whom nuance will be vital. Providers in the creative arts sector will be able to utilise the provider statement to articulate any deviation from the national norm, in relation to the idiosyncrasies of arts education and graduate destinations.

We agree there should be a page limit for provider submissions, however we have concerns about the page limit proposed, as a provider with more students and greater student diversity may require more pages than a provider with fewer students or more homogenous student body. We suggest that OfS consider a range of page limit options, dependent on the size of the undergraduate student population, as well as student diversity, on a provider-by-provider basis.

We also share our institution's concerns around the timeline proposed for the 2022 submission, as this will create an immense workload at a period of high activity. We believe if possible this submission deadline should be pushed back in early 2023.

**8) To what extent do you agree with our proposal for student submissions? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

We strongly support the proposal for giving greater strength to the inclusion of student submissions. As a Students' Union, we already feed into our provider's Quality Review process through School-level student written submissions, and we believe this is a successful model for articulating student opinion and ensuring quality. We also believe that it will more greatly embed collaboration between providers and their Students' Unions. It also has the potential to provide leverage to students in discussions with their providers about enhancement activity that could take place at their institution.

We do however believe it is important that OfS and providers recognise the considerable resource that would be required of Students' Unions to produce an excellent quality student submission. For those institutions with Students' Unions, this would include staff time, as well as costs associated with undertaking primary research and data analysis to ensure that the submission accurately reflects a wide spread of relevant and contemporary student experience. We would welcome a guidance note from OfS encouraging providers to make available financial resources to their Students' Unions in the collation of the student submission, including recognition of the staff and other resources required in its undertaking, as it is in both parties' interests for the submission to be as accurate and well-evidenced as possible.

As above, we also believe that the current timeline for a submission in 2022 is unrealistic. This would be required during a period of high activity, and when many Students' Unions are still inducting their sabbatical officer teams, as well as organising welcome activities for their new students. We would welcome the submission being pushed back to early 2023.

**9) To what extent do you agree with our proposal for indicators? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

**These are:**

- **Student experience**
- **Student outcomes (continuation/completion/progression)**
- **Would refer to UG only and be split by full time/part time/apprenticeships**

We believe the metrics for student experiences to be fair. We particularly welcome the inclusion of 'student voice' as a metric of assessment, as we believe this will encourage greater partnership between providers and the Students' Unions in delivering better outcomes for students, and will work to ensure that student representation is recognised as at the forefront of securing a positive educational experience for students.

We do however have concerns around the decision to assess student outcomes beyond their studies, as intended and "successful" outcomes can look vastly different for each student due to their area of study, as well as their intentions when choosing to study their courses. Evidence of what students gain from their education also differs and may be difficult to provide for certain areas of study, in particular the creative arts.

Creative arts graduate destinations often involve an extended period of unpaid internships and portfolio building, which will not translate as quickly into high-earning jobs in a way that many traditional academic degrees do. We would not want arts degree providers to be penalised for the blight of slower career development and the government's underfunding of the creative arts sector, nor for universities to carry the blame for the economy that many creative arts graduates emerge into. We believe this should be an area that other areas of government should be held to account over, rather than utilising (and potentially scapegoating) universities as levers for economic growth.

We are also unsure that the continuation of students on their course or gaining a qualification would be accurate, especially for areas of study where it is more common for a student to leave study after receiving a job offer, but we acknowledge that this is a small proportion of students.

**10) To what extent do you agree with our proposal for expert review? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

We agree with the principle that a TEF panel should be created.

We however disagree with the appointment of Professor Sir Chris Husbands to chair the panel due to his previous record of devaluing student experience and student voice at Sheffield Hallam University.

We also believe that the chair should be different for each iteration of the exercise, to guarantee fairness and impartiality, as well as draw out the expertise from chairs from different subject backgrounds and types of providers.

**11) To what extent do you agree with our proposal for the assessment of evidence? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

We agree that the overall rating should be no higher than the highest aspect rating, and no more than one higher than the lowest aspect rating, to ensure all aspects are considered holistically.

As above, we believe that the provider submission should be given greater weight, as it allows institutions who are small and specialist (such as creative arts providers) to articulate the nuance of the education they provide. We also believe this would work to prevent small and specialist providers being penalised due to aspects outside of their control.

Our concerns around student outcomes are outlined in our answer to Question 9.

**12) To what extent do you agree with our proposal for published information? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

We agree that information should be published in location accessible to students, whether prospective or current. We do not however believe that this will have a significant impact on student choice.

We agree that the status should be named as “award pending”, instead of indicating that the provider participated in TEF, to make clear that providers’ applications are being processed.

**13) To what extent do you agree with our proposal for the communication of ratings by providers? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

We are unsure that allowing providers to use TEF ratings to publicise undergraduate courses would be of significant benefit to students, as it may lead providers to adhere to standards set out in TEF for the sake of publicising their rating, as opposed to ensuring a good student experience.

This is particularly of relevance to small and specialist providers (such as creative arts institutions) for whom resources may be more limited. We would prefer that providers dedicated resources to excellent teaching, which may often involve very specialised methods that are not recognised by TEF metrics, rather than chasing TEF ratings and diverting resources away from students. While TEF does cover many aspects of a student experience, we do not believe it is all-encompassing (nor should it be), but it may be construed as such by potential students.

**14) To what extent do you agree with our proposal for the name of the scheme? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

We agree with the name of the scheme, as it is already familiar. However, we recognise that since student experience and student outcomes are not solely dependent on aspects of formal teaching, but also include other functions of universities and Students’ Unions in producing good outcomes, then we would welcome a name that more broadly reflects this as an assessment of not solely teaching quality.

**15) To what extent do you agree with our proposal for the timing of the next exercise? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reason for your view.**

As stated above, we have concerns about the timing of the next submission. The intensive work that would be required to produce a high-quality submission would need to take place during an already busy period of high activity, when many Students’ Unions are still inducting their sabbatical officer teams, as well as organising welcome activities for their new students.

In order to produce a high quality student submission, this would require dedicated staff time to collate the relevant data and evidence for a submission, as well as the undertaking of primary research and data collection. It would also depend on student reps (such as course reps) being

in post, to provide testimony and information directly from students; many of these reps will only freshly be in post (or awaiting election) at this time of year.

We would welcome the submission being pushed back to early 2023.