



INDEPENDENT
HIGHER
EDUCATION

Independent Higher Education response to the Office for Students consultation on the Teaching Excellence Framework (TEF)

March 2022

About IHE

Independent Higher Education (IHE) is the UK's representative body for independent providers of higher education, professional training and pathways. Our 62 members are highly student and teaching-focused and include many small and specialist providers. One of IHE's principal aims is to facilitate an SME model of higher education, enabling new approaches and innovation to flourish within a flexible and proportionate regulatory environment.

Questions

Question 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.

Proposal 1 – Provider-level, periodic ratings

An overall rating should be awarded to a provider reflecting the quality of its undergraduate courses, and these ratings should last for four years.

Tend to agree

1. The introduction of a four-year cycle is broadly supported by the membership of Independent Higher Education (IHE), as this would significantly reduce burden and cost in comparison to previous iterations of the TEF process. As the ratings are allocated and distributed across all those who enter the cycle, IHE is supportive of the system as it is designed to ensure all providers are judged fairly against each other.
2. Some new providers will be disappointed to see that they are unable to access the uplift in fees and loans for a number of years, while awaiting the next TEF cycle. A fair alternative to this would be to reintroduce the provisional category for new providers and those who become eligible in the interim period between cycles. This would help new entrants to the market to compete with established providers, and ensure the OfS meets its responsibility to increase student choice by continuing to incentivise new provision.



3. We remain unconvinced that provider level creates an equal measure between small, specialist providers and multi-subject large institutions, where the latter can hide relatively poorer performance of individual courses without the careful consideration of subject by the panel. There is a risk with provider-level data that students will not gain the information they need as they are primarily comparing courses rather than providers. We support the use of subject-level data where it is available, for the purposes of student information. We encourage the OfS to create clear guidance to the TEF panel to ensure this data is identified and considered. If the panel does not use subject-specific data in its provider-level assessments then the data will not provide the incentive needed to ensure multi-subject providers seek enhancement and excellence in all their subjects and will limit the usefulness of TEF in informing students.

Question 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.

Proposal 2 – Aspects and features of assessment

Two aspects should be assessed and rated: the student experience and student outcomes. The criteria for determining ratings should be based on the extent to which very high quality and outstanding quality features are demonstrated for each of these aspects.

Tend to agree

4. IHE agrees that assessing very high quality and outstanding features is an appropriate aim for the TEF. In particular, students will find it useful to have additional components to the ratings as this provides more useful information to them, and will be more assimilable than the detail of the underlying indicators.
5. The clear link to the B conditions is useful for providers to reduce regulatory burden. Although “educational gains” does not have an equivalent baseline, this is equally useful for reducing burden because it allows each provider to find their own evidence of excellence rather than the impediment of prescriptive, generalist expectations. Notwithstanding the benefits of this approach, there is a significant concern that ratings for these aspects will be formed on data that may disadvantage smaller providers who do not have available or publishable data.
6. The OfS should endeavour to provide clear guidance to the assessing panel on rating providers where there is no data. Additional support should be given to providers who lack data, on how to supply the panel with the information required to make a judgement.
7. The OfS should undertake an SME assessment of the changes to the data indicators as they identify that the impact of these changes will be greatest on smaller providers. This should be published and there should be the opportunity



for IHE and SME providers to engage with the OfS to respond to any of its findings and recommendations before these proposals are implemented.

Question 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.

Proposal 3 – Rating scheme There should be three rating categories – Gold, Silver and Bronze – signifying degrees of excellence above our baseline quality requirements.

Tend to disagree

8. The three rating categories are now understood by the sector, and globally recognised. Although IHE has previously advocated for alternative nomenclature, there is not a compelling argument to change from the Gold, Silver and Bronze now that they have gained a level of traction among stakeholders.
9. IHE continues to champion the use of commendations, to support the rating scheme. This is particularly relevant now that providers are able to enter TEF without some of their data being available for the TEF panel to review. We would welcome a system which allows providers to celebrate and have assessed what they do best to encourage students to choose education which is right for them, which is why we recommend a system of commendations to highlight where providers show excellence in relation to specific missions. This will be particularly helpful for students with protected characteristics, who may not be able to identify information of relevance to them from the TEF labels alone, and may not be used to interacting with the large data sets used in the indicators.

Question 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.

Proposal 4 – Absence of excellence

Where there is an absence of excellence, no rating should be awarded and the published outcome should signal that improvement is required. This outcome for a provider should be considered as part of our general monitoring of quality and standards

Strongly disagree

10. IHE accepts that the TEF panel should not feel forced to give an award where there is no evidence of excellence. To do so undermines the value of the Bronze award.



It is also proportionate to use information from the TEF assessment process as part of general monitoring of B conditions, however it must be clear that it is not the role of the TEF panel to assess baseline quality. Their role is clearly identified within the purpose of TEF, as identifying excellence above the baseline.

11. However, OfS should not use the term “Requires Improvement”. If TEF is to be used by prospective students, that phrasing will be perceived in the same context as when it is used by Ofsted, which is not its intent. Prospective students will look for the regulator to provide an action plan for the improvement, which is unlikely to be the case as the TEF panel’s role is not to assess the baseline but to look for excellence above it.
12. IHE agrees that it needs to be clear when a provider has not achieved a rating of Gold, Silver and Bronze. However, this clarity should go beyond those who have not reached the standards for a TEF award of excellence, and additionally distinguish between all categories of provider where no award has been made. This will avoid any unintended confusion between:
 - providers ineligible to participate,
 - providers who have opted not to participate, and
 - providers who participated but were not deemed to have demonstrated excellence.
13. For the purposes of informing student choice, OfS should consider guidance to the users of TEF ratings such as UCAS and Discover Uni to distinguish between the categories above. Labels such as “Not eligible for TEF”, “TEF voluntary – did not participate” and “No TEF Award given” could be alternatives to “Requires Improvement” and no recognition of TEF at all, and much more clear. The other types of possible provider status should be distinguished between, to avoid the risk of any unfair inference being made.
14. Not only will students find the suggested “Requires Improvement” unhelpful for explaining the status of the provider, our members have stated that this will act as a disincentive to opt in to the scheme. This is counterproductive to the stated purposes of incentivising excellence and informing choice.

Question 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.

Proposal 5 – Provider eligibility To be eligible to participate in the TEF, and to retain a rating once awarded, a provider must satisfy baseline quality and standards requirements.

Tend to agree



15. IHE welcomes the ability for more providers to participate in the TEF, through removal of the full data requirement. It is prudent to retain the threshold of 500 students for mandatory participation in TEF, and we agree with the proposal that TEF should be optional for a provider that does not have at least one TEF indicator based on a denominator of at least 500 students.
16. The independent review of TEF made it clear that assessments must be statistically robust. We would therefore encourage the OfS to review the mandatory participation thresholds with the first TEF panel as we feel there may need to be a higher threshold for mandatory participation beyond one indicator. Judgements which are made by a subjective panel comparing a full data set to a very minimal data set are unlikely to be statistically robust. We remain concerned that a lack of data will make it difficult for the panel to make a judgement, and that smaller and newer providers may be unfairly disadvantaged.
17. Without a mid-cycle access point to the fee uplift, the four-year cycle will be anti-competitive. Providers who are new, not eligible, or who are establishing full data sets to enable a fair panel assessment will face significant disadvantage if they are unable to enter until the four-year cycle begins again. We encourage the OfS to reinstate a status analogous to 'provisional awards' to address this, but these should be limited to new providers who join the OfS register between cycles and to providers who reach the mandatory participation threshold or achieve a more robust data set between cycles. Providers applying for provisional awards should be required to participate in the next round of TEF to ensure that those who seek to access the uplift will be committed to the process and assessed at the next available opportunity.
18. The consultation states that due to lack of retrospective evidence, until new providers have graduating cohorts "it would not be possible to demonstrate excellence across the full range of outcomes. It would therefore be unlikely that such a provider could achieve the highest TEF rating." This will stifle competition, disincentivise voluntary participation in the TEF, and therefore prevent students making informed choices.
19. The OfS should provide additional written guidance to the panel to ensure that providers who are missing data, including graduate outcomes data, are not disadvantaged in the rating system. We do not accept that newer providers with no graduate data would not be able to achieve Gold if they are able to show excellence across their provision and excellence in their preparation of students for graduate success.
20. We welcome the approach that providers who change registration category or who create a new entity for their existing HE business are able to transfer their TEF rating. However, clarity is required for the criteria the OfS plans to set for providers who they deem are not the same business as the previous entity. We would also welcome more clarity on the criteria for merged entities, especially where the newly merged entity includes an entity without a TEF rating.



Question 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.

Proposal 6 – Courses in scope

All of a provider’s undergraduate courses, and the students on those courses, should be within the scope of a TEF assessment.

Don’t know or prefer not to say

21. It is appropriate to focus on undergraduate provision for the purposes of the TEF at this point. We welcome the opportunity to demonstrate excellence for TNE providers, and where credit-bearing courses do not lead to a qualification in the written submission. The specific inclusion of international students within the courses in scope is also supported by IHE. However, it should be made clear to students accessing the information that there are limitations in how they are represented within the underlying data. There may be a risk of them misunderstanding that not all of the data used will apply to the experience of international students.
22. We remain very concerned that the use of metrics which double count students across partnerships create additional burden with little advantage to students. The sector has supported the use of delineated data showing taught and registered students for student experience metrics in the past as the metric has related closely to the provision offered by the teaching provider. These proposals extend that delineation to data which is less clearly controlled by the teaching provider. This will create further confusion for students and offer little to support OfS in meeting their regulatory goals.
23. OfS should complete an impact assessment on proposals to extend the delineation of student data by collaborative partnerships for both regulatory use and publication. This review should identify any additional burden and cost of counting and considering student data multiple times across multiple partners, with particular attention to the impact on micro and small providers. Understanding the cost to OfS, which is passed to providers and then students, and the cost to providers, also passed to students, will enable a more informed choice on if students get value for money out of such an assessment.
24. OfS should delay the publication and use of this data until the impact assessment and the promised OfS validation market review could be completed. IHE and our members in collaborative partnerships would welcome the opportunity to support OfS to ensure the reviews include a thorough understanding of the current partnership models.
25. While we welcome the clarification on eligible courses, we encourage OfS to make clear in the guidance to both providers and to students, that regardless of size providers who only teach at postgraduate level (and importantly those with courses that are postgraduate in time but attract undergraduate funding) are not



eligible. IHE members such as the London School of Architecture and Sotheby's Institute of Art are not eligible for TEF at provider level as none of their courses are included in the data. It is important that where TEF data is publicised, the eligibility of registered HE providers can be clearly identified.

Question 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.

Proposal 7 – Provider submissions

Participating providers should submit evidence of excellence in relation to the experience and outcomes of their students.

Tend to agree

26. The broad principle of this is sound, however providers may use a significant amount of their 20 pages to contextualise their missing data, or data that does not have “splits” applied. The OfS should provide clear guidance to providers on how submissions can support greater contextualisation of data where values are missing. This will ensure that the panel receives the information of most use. Additional pages should be allocated in the provider submission, for instance, one extra page could be allowed per missing data split or indicator. This will ensure that providers with relatively little data do not need to utilise their submission explaining what is missing. Instead they can provide evidence of excellence, as intended, making sure they are on an even playing field with their more established counterparts.
27. The consultation states that “if a provider considers that the page limit is unduly constraining, it would have the opportunity to submit additional information at the representations stage.” This is conceding that providers may not have enough space to explain their provision. But the option offered can lead to delays in publication of TEF outcomes, so this does not seem a suitable method of providing further explanatory information in cases where it is necessitated by contextualisation of missing data.
28. Providers are asked to “avoid describing its strategies or approaches to learning and teaching without also explaining and evidencing their impact on student experiences and outcomes.” If impact cannot be evidenced due to nascency of provision, or in cases where evidence may identify individual students due to the size of provision, suitable approaches for assessment should be used. The OfS should provide guidance on demonstrating impact with small amounts of data. Consideration should be given to the use of case studies, with the permission of any student identified, within guidance to the panel and provider including how best to present these with the space required for the information contained.
29. Guidance should be clear and comprehensive for providers who are new to TEF, ensuring it is suitable for providers of different size and capacity. Our members have specifically asked for past examples of submissions, to help familiarise them with the process.



This would help to ensure that the approach to TEF supports proportionality of the regulatory task, with different types of providers being supported appropriately.

30. While we support the idea of standardisation across the submissions, by the very nature of the eligibility criteria and TEF data, the submissions will not be standardised. We believe the OfS should prioritise supporting providers to create comparable submissions over standardisation. There should be recognition in the submission process that data – both that which the OfS provides the panel and that which the OfS suggests the provider should offer – will not be comparable, and context will be needed to support panel judgements. This will require specific guidance for those with little data available and where impact is often difficult to demonstrate due to low student numbers.

Question 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.

Proposal 8 – Student submissions Students should be encouraged to submit their views on the quality of their experience and outcomes.

Tend to agree

31. Keeping the student experience central in the assessment is an important part of the process. The use of a form of student submission creates a risk of smaller providers being the most likely to be underrepresented by this component of the assessment process. IHE members, particularly smaller providers and those who teach shorter courses, do not have independent student unions with their own budgets or dedicated staff. They will not have student officers who would naturally expect either to act as or closely support the student representative responsible for a submission, for whom this role would be paid full or part time. Elections for student representatives in most institutions are annual, and often held in September and October, giving limited time for representatives to participate in TEF activities. Our members are very worried about their students being able to compile a submission, and how this will be viewed by the assessing panel.
32. Independent higher education providers do not use the sabbatical officer process, and there is no summer handover period between representatives. Representatives are likely to be new in post following elections in September/October. The timing therefore disadvantages this part of the sector. The consultation states that this is a voluntary component but it is difficult to envision how the lack of submission will be viewed by the panel. This provides a valuable additional opportunity to demonstrate excellence from the student perspective but it may be challenging for students in many independent providers to contribute in this way. The panel needs careful guidance to ensure that the absence of a student submission is viewed without prejudicing their view of the overall assessment.



33. A more structured submission would help those students who are less familiar with quality assurance and representative processes, and could potentially change or remove the direct need to nominate a single individual. As currently proposed, this approach could impede submission if that particular student does not have the time or inclination to submit or seek perspectives from fellow students. Options could include:

- a bank of questions for students to ask, where the answers would be of value to the panel,
- use of case studies to circumvent the problem of small sample sizes for particular sections of the student body,
- one student cannot canvas the whole body, especially in courses which are industry based, have block teaching where the students are unlikely to engage outside their course and cohort, or are shorter courses with little opportunity for students to gain that in-depth understanding of the student body and excellence in teaching required for a submission,
- student response to provider submission — this is noted as a possible option but not to be used as the sole method of student submission. This is unhelpfully limiting the options.

The OfS should identify and develop alternative models of student submission to support a broader engagement of students where formalised structures like students' unions are not in place.

Question 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.

Proposal 9 – Indicators

The OfS should produce numerical indicators based on the National Student Survey (NSS) responses; and student outcomes indicators defined consistently with the indicators proposed for the regulation of student outcomes through condition B3. For TEF purposes, the OfS would indicate a provider's performance in relation to its benchmark.

Don't know or prefer not to say

34. IHE agrees that using the NSS will not place undue burden on providers, and the balance with provider submissions is an appropriate approach to allow for the breadth of types of provision to demonstrate excellence. Consistency of the student outcomes indicators with the B3 indicators will give coherence within the TEF process. We do remain concerned at the use of Graduate Outcomes as part of the underlying metrics due to the classifications currently used in graduate data of 'highly skilled jobs'.



By the very nature of some of the courses delivered by our members and the labour market dynamics of the industries they support, their graduates do not fall into the current 'highly skilled' graduate classifications even though they are in fact highly skilled and possess extensive and industry-specific knowledge from their degree. We will respond fully on these issues as part of the Student Outcomes and Indicators consultations.

35. IHE is concerned that there is no ability for online-only students to distinguish their courses from within the TEF data. This should be considered a distinct mode of study, which would correlate with the available course search filters on Discover Uni. This would promote choice and clarity of information for students, and allow providers to show excellence in those areas.
36. The detail on where splits in data will not be reported show that this is most likely to affect smaller and newer provision. The OfS should provide additional guidance to providers and the panel where the data cannot be published, on how a judgement will be made and what the panel should rely on. Note that any data that can only be published at provider level will often face the same challenges.
37. We remain concerned that the 'Other undergraduate' category will not have detailed enough data to show excellence where it is at level 4 specifically. We have a number of members who teach only at level 4 and would be disadvantaged by the lack of granularity in this data. This can be addressed in the submission, but again this places these providers at a disadvantage, having to use their submission to explain a lack of data granularity. We remain concerned that as a result the new TEF process will not be able to support student information for level 4 and 5 courses, of the very kind that the Government has asked providers to broaden their offer in.
38. The OfS should undertake an SME impact assessment, to identify how the approach to the data will affect the smaller providers. This should be published and the opportunity for IHE and SME providers to engage with the OfS to implement any recommendations before the proposals are implemented.

Question 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*

Proposal 10 – Expert review

Ratings should be decided by a TEF panel applying expert judgement.

Strongly agree



39. Panels should be **required** to have representation from non-traditional HE providers for both students and experts. There should be a particular focus on small-setting providers for whom data will not be available so contextual information can be better understood through the submission. We are concerned that the implementation timeline will not support the recruitment of students and staff from independent providers due to the volume of change in the HE sector and the timing of the panels.
40. The process of representation is appropriate, to ensure a fair process. However it is essential that a full timeline on the representation process is published and upheld.
41. The OfS should create an independent process for representations. Given the subjective nature of these decisions, and the overreliance on the submission for smaller providers it would be inappropriate to ask the same panel to consider representations against their previous decision. This aligns with the Regulator's Code which expects regulators to provide an impartial and clearly explained route to appeal against a regulatory decision.

Question 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.

Proposal 11 – Assessment of evidence

The panel should interpret and weigh up the evidence by following a set of principles and guidelines, including that:

- **the indicators should contribute no more than half the evidence of excellence in each aspect**
- **the two aspects should be equally weighted when deciding the overall rating.**

Tend to agree

42. With more focus on the written submission, and less focus on data there is greater opportunity to reconsider the idea of commendations where particular pockets of excellence have been found. These commendations would be a good counterbalance to the lack of data for smaller or specialist providers, and support student choice through greater information on excellence. We welcome the removal of the initial hypothesis which disadvantages providers who are missing data.
43. Annex F states: *“Evidence would be more compelling, and greater weight placed on it, where a provider’s policies and practices are informed by robust evidence, data or evaluation.”* This could disadvantage those who have very small data sets, already needing to rely on the submission heavily in the absence of data.



44. Commendations which are awarded for activity which supports harder-to-reach applicant groups, part-time students, specialist and industry provision, disabled students, equality and diversity could be welcomed into the TEF models. This would help to level the playing field for different types of provider, would offer motivation for the enhancement of provision for these students, and would deliver more information to these students on which providers demonstrate excellence in the areas which are most relevant to them.
45. We recommend that OfS consider amending Principle C of paragraph 194 of the consultation, to reflect that not all sources of evidence are available, and ensure that a balanced consideration of the evidence reflects that by their nature some providers may be unable to provide the same level of evidence, for example publishable data or evidence of impact across a high volume of students.
46. We would welcome more information about the circumstances in which the OfS would suspend a provider's eligibility for TEF or existing TEF rating. The process for assessing B conditions may make very specific judgements on small aspects of data which does not meet the absolute thresholds. This does not negate the possibility of excellence on the balance across the provider. There is a risk that the TEF panel and the OfS make very different judgements on the same data, which could produce confusing outputs for students.

Question 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.

Proposal 12 – Published information

TEF outcomes and the evidence used in assessment should be published in an accessible and timely way.

Tend to disagree

47. TEF data should not be published where a provider has not been given an opportunity to make a written submission. To do so creates an unfair disadvantage to new providers who will not have had the same opportunity to explain their data. This is especially important for new smaller providers who are just over the 500 student limit, where the data will have a number of unpublishable values.
48. Publishing data each year for those registered with the OfS but not yet making TEF submissions could have an unwarranted and prejudicial reputational and commercial impact, with interpretations being made without the accompanying parts of the TEF process including the submission and accompanying judgement. Data should not be published in this misleading manner, particularly where it may dissuade a student with protected characteristics from studying at an institution that is fully able and committed to supporting them.



49. However, full transparency on decisions made once the TEF assessment has been undertaken is appropriate. The OfS should ensure that the timeline for the representation process is published, so that the provider will be able to make an informed choice on whether to make representations following a provisional decision on their TEF rating.

50. IHE support the proposal for a “pending” label where a provider has challenged the provisional judgement of the TEF panel and is making representations. Our members feel the absence of information creates more confusion for prospective students and the OfS should be transparent that a decision is in fact pending.

51. The OfS should consider how external sources such as UCAS and Discover Uni would communicate clearly where a provider is not eligible, or has not voluntarily entered TEF. This should be distinguished from providers that have participated in TEF but not achieved a Bronze, Silver or Gold award. IHE advocates that published information should include the following:

- Whether a provider has entered TEF,
- The year that a provider first entered TEF,
- The last year that a provider entered TEF,
- The rating a provider was awarded that year.

For ‘4’, the answer can be ‘No rating yet’. What this signifies can be inferred from the answers to ‘1’ and ‘2/3’.

Question 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.

Proposal 13 – Communication of ratings by providers
A provider should be able to display and promote its own TEF rating in accordance with a set of guidelines

Strongly agree

52. IHE supports the management of this process by the OfS so that there is clarity for applicants and students. The guidance needs to take into account all types of provider, including those where eligible courses in scope only form a small component of provision.

Question 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.

Proposal 14 – Name of the scheme
The scheme should be named the Teaching Excellence Framework

Tend to agree



53. IHE agree that reverting to the previous version name of the scheme is advisable. Establishing a new name would not be helpful for maintaining understanding of the purpose of the awards for students and other stakeholders. We support the OfS's approach to gaining student feedback on this particular proposal.

Question 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.*

Proposal 15 – Timing of the next exercise

The next exercise should be carried out during 2022-23 and outcomes published in spring 2023. Future exercises should be conducted every four years.

Strongly disagree

54. The TEF application window should be delayed until January 2023 to reduce the already high burden on providers due to the intensifying OfS regulatory activity in the September–December 2022 window. This is particularly acute for providers who are switching to the Student data record from the Student Alternative data record with submissions due within the TEF application window.
55. Student representatives at independent providers are normally not elected until the beginning of the academic year. Particularly in providers with one or two year courses, they are unlikely to have representatives in a position to participate in September or even mid-November. A later TEF cycle will allow for these representatives to be elected, receive training, and prepare a submission that will be of most use to the assessing panel. The current timeline would place smaller providers, and those with shorter courses, at a disadvantage compared to those with sabbatical officers.
56. The publication of TEF ratings in May is a cause for concern. Applicants will find it unhelpful to have a key piece of information suddenly made available after the main admissions processes in UCAS have completed. This could cause a lot of unnecessary volatility in the admissions cycle over summer, pushing more students into Clearing. This could particularly impact small and new providers who are not able to participate in TEF, if the lack of clarity around their labelling on UCAS and Discover Uni is not resolved (as outlined in response to Question 12). Applicants may assume that providers have no TEF label because they have not demonstrated excellence, rather than because they are not able to participate in the scheme.
57. IHE advise that TEF awards should not be published until mid-September in time for the start of the next recruitment cycle.



Contact IHE

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