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Making Metrics Matter: A more ambitious approach to tackling racial inequity in higher education

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About the author

Dr Katharine Hubbard is a National Teaching Fellow and Principal Fellow of Advance HE. She is currently Director of Learning Enhancement and Academic Practice at Buckinghamshire New University, where she co-chairs the Access and Participation Plan Oversight Group. Her research focuses on inclusive practice and equity within higher education, with a focus on structural components of inequity and the relationship between metrics and access and participation.

Terminology[1]

❭ **Equality and equity:** Many authors have highlighted confusion between equality, equity, fairness and justice.[2] Here I use equality to mean treating all individuals the same, which may still result in unequal outcomes. I use equity to mean giving individuals what they need to succeed in a given situation, resulting in equal outcomes despite one group starting in a position of disadvantage. Achieving equity in practice therefore requires subjective judgements about how to redress disadvantage, so can be more controversial than equality.

❭ **Global Majority:** I use the language of Global Majority as a more respectful term than either Black and Minority Ethnic (BME) or Black, Asian and Minority Ethnic (BAME), but disaggregate data to Black and Asian when possible.[3]

❭ **Awarding gap:** In many reports, inequity of degree classification between two groups are referred to as attainment gaps. However, the attainment gap perpetuates a model whereby the focus is on the attainment of individuals rather than the structural role of the institution.[4] I therefore use the language of awarding gap throughout, but note that the Office for Students uses the language of attainment.

Executive summary

Progress towards racial equity in UK higher education is notoriously slow. Black and Asian students are less likely to be admitted to prestigious institutions and less likely to graduate with a First or Upper Second-class degree. Black academics are under-represented across the sector, particularly among professors. Without structural change, we will never see progress towards genuine racial equity.

This paper considers the current sector landscape around racial equity, focussing particularly on structural mechanisms that drive decision making by senior institutional leaders, as it is only through strategic institutional actions that impact will be made at scale. I particularly focus on the Teaching Excellence Framework (TEF) as the highest profile component of the English regulatory landscape.

Chapter 1 introduces the topic of racial equity within UK higher education, and the centrality of metrics and regulation on institutional behaviours.

Chapter 2 surveys the regulatory and non-regulatory instruments related to racial equity in UK higher education. It demonstrates that the current racial equity landscape is complex and contradictory, letting institutions de-prioritise work to improve outcomes for Global Majority staff and students. Racial equity is therefore not positioned as a major strategic priority.

Chapter 3 considers the relationship between the 2023 Teaching Excellence Framework and racial equity. I compile a dataset to link TEF outcome ratings to inequity gaps for four undergraduate outcomes (continuation, degree completion, degree class awarded and progression to higher-level study), and to (under)representation of Asian and Black students and academic staff within each institution.

For those outcomes included in TEF2023 (continuation, completion and progression), there were significant outcome differences by TEF rating. Gold providers had more equitable outcomes than Bronze for all TEF2023 outcomes, except for the Black progression gap. Awarding gaps were not included in

TEF2023, and there were no significant differences in awarding gap by TEF rating. There were no significant differences in the representation of Asian staff or students by TEF rating, but Silver and Gold institutions had significantly fewer Black academic staff.

There were seven TEF Gold-rated institutions with Black awarding gaps of over 25 percentage points, and over half of Silver and Gold institutions significantly under-recruit Black academics relative to the UK working-age population. Only a small proportion of TEF Gold institutions had any Black professors or senior academic staff at all. There are multiple TEF Gold and Silver providers with significant racial inequity of outcomes and under-representation of Global Majority staff and students.

Chapter 4 presents a model for how racial equity metrics could influence TEF ratings. The model is not proposed as a definitive solution but as an illustration of how TEF could more directly assess significant racial inequity. I define a flag-based system, whereby individual providers with significant racial inequity are allocated a flag for each of eight student outcomes and four demographic representation indicators. I then propose different models for relating these flags to TEF ratings. If all Gold and Silver institutions with three or more racial inequity flags were downgraded, around one-in-five providers would see their TEF rating change as a result of racial inequity or under-representation.

Chapter 5 provides an overall discussion and conclusion, and a call to action. I argue the considerable racial inequity in some institutions undermines current TEF ratings. Can an institution really be considered Gold standard when it has a Black awarding gap of over 25 percentage points and students never encounter a Black academic? My proposal suggests a pragmatic way in which racial equity could be more directly incorporated into the Teaching Excellence Framework. I strongly encourage the regulator to position equity of outcomes more prominently within institutional assessments. I call on the higher education sector to take bolder structural action, ensuring racial equity is given the priority it needs and deserves.

Contents

1. Introduction

Despite considerable pressure to do so, UK higher education has failed to make meaningful progress on racial equity and inclusion.[5] Only 1% of UK professors are Black.[6] Black and Asian students are less likely to be awarded higher degree classifications than their White peers.[7] Out of 164 vice-chancellors, only two are Black.[8] Despite multiple reports highlighting these issues year after year, UK higher education has been described as being 'remarkably complacent' around issues of racial inclusion and ethnic diversity.[9] The Race Equality Charter scheme run by Advance HE is voluntary, and has had only modest impact.[10] Change is notoriously slow, leaving staff and students from disadvantaged communities both systematically disadvantaged and dealing with the psychological impacts of that disadvantage.

This issue should matter to all interested in higher education. Some will approach this from a social justice perspective, seeing structural disadvantage as an ethical or moral issue. We can also approach it from a student consumer rights perspective. A Black student pays the same tuition fee as White peers, yet they are less likely to complete their degree, be awarded a higher degree classification or progress to graduate level employment. They are also less likely to feel a sense of belonging, see Global Majority role models in their academic staff or experience a curriculum that speaks to their experiences.[11] Disproportionately poorer educational outcomes on demographic lines also have a genuine economic cost to both individuals and society, as inequity in the higher educational space transfers into the job market with implications for intergenerational social mobility.[12]

If the sector is to accelerate progress in this area, the approach to racial equity and inclusion work needs to change. In particular, racial equity work needs to be positioned so it is genuinely prioritised by senior leadership teams. To do this, we need to evaluate critically the current structural drivers of racial equity and propose new alternatives that ensure this work is given the strategic priority it needs.

This study explores the role metrics and regulation might have in driving racial equity, focussing particularly on the potential for the Teaching Excellence Framework (TEF) to incorporate equity and representation more robustly. UK higher education is highly driven by metrics and performance indicators. Most providers will have a complex series of metric-driven performance dashboards. Heads of department and others in leadership roles will be expected to write data-driven improvement plans to address any deficiencies in these metrics in their local context. Senior teams will be planning their approach to TEF, and therefore shaping priorities in line with TEF structures. To create systemic change, these metrics and regulatory mechanisms need to provide clear focus on racial equity and representation.

This analysis is not an endorsement of metrics as the 'right' way to approach social justice issues. Many working in this space are passionately opposed to quantitative metrics, claiming they only exist to reinforce existing power structures. Metrics are certainly inherently flawed and only capture a subset of what is important. However, in the modern higher education sector, 'what gets measured gets done'.[13] If these key metrics do not include racial disparities, progress towards racial equity in higher education will be relegated to an afterthought at best. Here I consider to what extent the current regulatory metrics capture racial equity and propose a pragmatic way forward for the sector. I encourage the sector and regulator to develop more robust assessments of racial equity and representation collaboratively that can have real impact.

2. The current landscape of English higher education related to racial equity outcomes

I will first summarise the current state of higher education performance metrics through the lens of racial equity. Within the sector, there are two types of measure:

❱ **Absolute measures** capture outcomes for all students, for example an institution might have a degree completion rate of 83%.

❱ **(In)Equity measures** are typically expressed as gaps between two demographic groups, or as demographic split metrics. For example, if 93% of White students complete their degree and only 83% of Black students do, this gives a gap of 10 percentage points.

While gap metrics can be highly theoretically and technically flawed, they are widely used as a pragmatic quantitative descriptor of inequity.[14]

There are five key student outcome measures used by the Office for Students (OfS). The choice and construction of these indicators has significant influence on the higher education sector. These measures capture different aspects of the student journey.

i. **Access:** The demographic makeup of students entering higher education.

ii. **Continuation:** The proportion of students continuing in their studies or to have gained their qualification one year and 15 days after starting a full-time programme of study (two years and 15 days for part-time students).

iii. **Degree completion:** The proportion of students gaining a higher education qualification four years and 15 days after starting a full-time programme (six years and 15 days for part-time students).

iv. **Attainment / awarding:** The proportion of undergraduate degree qualifiers awarded First or Upper Second-class (2:1) degrees.

v. **Progression:** The proportion of *Graduate Outcomes Survey* respondents who were in graduate level employment, further study or other positive destinations 15 months after obtaining their qualification.

Office for Students Condition of Registration B3 requires providers to 'deliver successful outcomes for all of its students, which are recognised and valued by employers, and / or enable further study'.[15] It has established minimum expected student outcome thresholds for continuation, degree completion and progression, with different thresholds for full-time and part-time students, and for undergraduate courses with a postgraduate component such as an integrated Master's.[16]

The Equality Act (2010)

All UK employers, including higher education providers, are legally required to comply with the Equality Act (2010). This legislation defines protected characteristics that must not be used to discriminate between individuals or groups. One of these characteristics is race, which the Act defines as including colour, nationality and ethnic or national origins. The legislation established that individuals are protected against direct discrimination, indirect discrimination, harassment or victimisation on the basis of the protected characteristics.

There are specific sections of the Equality Act (2010) devoted to further and higher education. These establish that an educational provider must not discriminate against individuals on the basis of protected characteristics in student admissions and educational provision.

Access and Participation Plans

Office for Students Condition of Registration A concerns access and participation for students from all backgrounds. An institution must have an Access and Participation Plan in place if they are registered with the Office for Students in the 'Approved (fee cap)' category, and they want to charge above the basic tuition fee cap and access public funding for teaching and research. As of 2024/25, Access and Participation Plans were in place at 255 out of 427 English providers on the OfS register.[17]

Through their Access and Participation Plan, providers are required to identify risks to equality of opportunity.[18] Some risks are aligned to protected characteristics defined by the Equality Act (such as disability and ethnicity) while others consider other factors such as socio-economic status. Providers must assess their equity of performance for the five undergraduate student outcomes above. The current Access and Participation Plan landscape only concerns undergraduate outcomes, overlooking inequity at postgraduate level.[19] The indicators are calculated on the basis of UK home students; students paying international fees are excluded.

Access and Participation Plans are forward facing, meaning providers must establish their current performance and define targets and action plans for the next five years. Institutions have autonomy over the choice of those targets, which vary considerably between providers. Highly selective 'elite' institutions may set targets for more equal access through undergraduate recruitment, while a widening participation institution might focus more on student outcomes such as degree class awarded and progression to employment or postgraduate study. The majority of Access and Participation Plans identify ethnicity-related awarding gaps as a significant issue and, as of 2019, 112 providers had set targets to narrow the Black and / or Asian awarding gap.[20]

The Office for Students have indicated that institutions who fail to engage meaningfully with their Plans may face consequences. This includes refusal to approve a future Plan, with the ultimate consequence affecting institutional tuition fee caps.[21] At the time of writing (late 2025), the Office for Students has not imposed this sanction. The link between plans and tuition fee status has undoubtedly created significantly higher awareness of (in)equity. Providers reported that the OfS reforms to 2020/21 Access and Participation Plans resulted in increased focus and ambition of targets.[22] However, there is limited evidence of the impact of Access and Participation Plans at sector level. The Black awarding gap for 2023/24 remains at 20.4 percentage points, with almost no change since 2018/19.

The Teaching Excellence Framework

The Office for Students uses the Teaching Excellence Framework (TEF) to assess the quality of providers. The TEF classifies institutions as Gold, Silver, Bronze or Requires Improvement. The TEF is arguably the most public facing and high-profile component of the Office for Students' regulatory landscape, and has become a key driver of institutional decision making.

In TEF2023, providers were given an award for: (i) student outcomes, which were assessed quantitatively; and (ii) student experience, which was assessed qualitatively through an institutional narrative.[23] This assessment covered undergraduates, including international students, but excluded postgraduates. An institution could obtain different awards for outcomes and experience, and where these were different, the overall award could reflect either the higher or lower level.

The TEF assesses student outcomes in line with the B3 Condition of Registration. TEF2023 considered continuation, completion and progression, but not access or attainment / awarding of undergraduate degree classification. Nine demographic splits were used in TEF2023, one of which was ethnicity. TEF student outcome ratings are calculated retrospectively. For example, for TEF2023 the degree completion metric was calculated on the basis of the cohorts starting their courses between 2011/12 and 2014/15. This lag means the TEF rating may not reflect current institutional outcomes where there have been recent changes in performance.

The Office for Students launched a consultation into the future of the TEF in autumn 2025, so the shape of assessment exercises will evolve.[24] Significant changes are likely to include a requirement for all providers in England to take part, move to a rolling window of assessment, inclusion of postgraduate taught provision, a risk-based approach to assessment, greater incentives for achieving Gold ratings and increased regulatory interventions for those assessed as Bronze or Requires Improvement. Simultaneously, the 2025 *Post-16 Education and Skills white paper* indicates that TEF ratings will have more significance in terms of funding eligibility, oversight and future fee uplifts.[25]

While the exact method of future student outcome assessment is not yet known, it is likely to involve a simplified method that focusses on minimum required student outcomes relating to continuation and degree completion. The TEF consultation also includes proposals that strengthen the requirement on providers to describe 'how they meet the needs of all of their students, including those from disadvantaged backgrounds' and that 'a provider would need to deliver consistently high or outstanding quality for all groups of students to achieve a Silver or Gold rating'. The Office for Students has also invited views on 'opportunities to reduce duplication of effort between the future TEF and APPs [Access and Participation Plans]', indicating this area is likely to evolve further.

Office for Students Key Performance Measure

Independent of the Teaching Excellence Framework and Access and Participation Plans, the Office for Students has also established a Key Performance Measure (KPM7) specifically relating to degree attainment for students from ethnic minority groups.[26] This Key Performance Measure is expressed in terms of the ethnicity gap for First-Class degrees awarded only. This differs from the awarding gap construction for Access and Participation Plans, which considers gaps in students awarded Firsts or Upper Seconds.

Higher Education Statistics Agency statutory returns

UK higher education providers have a duty to provide data returns to the Higher Education Statistics Agency (HESA) every year.[27] These data are used for multiple purposes, including publication of Key Information Sets and in the compiling of league tables. Institutions are required to submit a wide range of data relating to both students and staff, including breakdowns of student outcomes, staff contract type and salary by ethnicity.

University league tables

League tables are not part of the regulatory landscape of UK higher education, but are significant drivers of institutional decision making. All of the league tables include absolute student outcomes such as continuation and graduate

prospects, but none currently includes any equity metrics for any demographic characteristic.

Race Equality Charter

Advance HE runs the Race Equality Charter, an optional scheme established in 2015 to advance racial equality for staff and students. It covers the experiences, representation, progression and success of staff and students from racially disadvantaged ethnic groups.[28]

Application for Race Equality Charter awards requires the presentation of multiple datasets relating to students, staff and senior leadership teams, disaggregated by relevant ethnicity groups. Required staff data include contract type, applications and success rates in recruitment and promotion to academic and professional as well as technical and operational posts. Student data must include student demographics at undergraduate and postgraduate level, undergraduate application success rates, continuation, completion and degree awarding for undergraduates and postgraduates. The Race Equality Charter therefore takes a much more comprehensive approach to ethnicity data than TEF and APP, but is not a regulatory requirement.

Engagement with the Race Equality Charter from the sector has been underwhelming and slow. As of late 2025, around 100 institutions have signed up to the Charter, and around 70 have achieved a Bronze award. Just seven institutions have obtained a Silver award and the criteria for Gold has yet to be established. Studies have highlighted the lack of impact of the Race Equality Charter, positioning it as a tool to support existing equality, diversity and inclusion workstreams rather than serving as an effective driver of strategic institutional action. There is no significant difference in the ethnic diversity of staff in institutions that have or have not signed up to the Charter, indicating limited impact.[29]

Overall assessment of the regulatory and metric landscape with respect to racial equity

The landscape of equity metrics in UK higher education is therefore complex and contradictory. I summarise the metrics used in regulatory and league tables in

Table 1. Even within those activities overseen by the Office for Students there is inconsistency.

Table 1: Summary of student racial equity metrics in UK higher education

Framework / scheme	Access and Participation Plans	Teaching Excellence Framework 2023	Office for Students' Key Performance Measure 7	HESA return	League tables	Race Equality Charter
Ownership	Office for Students	Office for Students	Office for Students	Higher Education Statistics Agency	Newspapers & *Complete University Guide*	Advance HE
UK regions	England	England	England	All	All	All
Level	Institution	Institution	Sector	Institution	Institution	Institution
Mandatory for providers?	Providers in the Approved (fee cap) category charging above the basic tuition fee cap	Providers with at least 500 undergraduates	N/A	Yes	Yes	No
Continuation		✓		✓		
Completion		✓		✓	✓	
Awarding				✓	✓	
Progression		✓		✓	✓	
Equity of access	✓			✓†		✓
Equity of continuation	✓	✓		✓†		✓
Equity of completion	✓	✓		✓†		✓
Equity of awarding	✓ (1st and 2:1)		✓ (1st only)	✓†		✓ (1st and 2:1)
Equity of progression	✓	✓		✓†		✓

Equity = differential outcomes for Asian / Black students compared to White students (gaps). † = data disaggregated by ethnicity but not expressed as gap. APP = Access and Participation Plan; TEF = Teaching Excellence Framework; OfS KPM = Office for Students Key Performance Measure; HESA = Higher Education Statistics Agency. All refer to undergraduate students only.

For example, the Teaching Excellence Framework does not include undergraduate degree classification awarding gaps when the Office for Students itself has a related Key Performance Measure focussed on racial inequity of degree classification. I argue this contradictory landscape means institutions lack clarity of focus when it comes to addressing racial equity. Some may even take the view that they can 'get away with' poor performance in terms of racial equity if other outcome measures are sufficiently strong. As a mechanism to achieve structural change, this overall approach is doomed to failure.

3. The relationship between TEF rating groups and racial equity measures

I will now focus my discussion through the lens of the Teaching Excellence Framework. I ask whether the current framework effectively assesses racial inequity or whether it was possible for an institution to obtain high TEF2023 ratings despite significant evidence of racial inequity.

Data sets and limitations

My assessment only uses publicly available data which could have been used in TEF2023 (Table 2). Data analysis is for full-time undergraduates only. Only UK-domiciled students are contained within these datasets; 'Asian' means a UK student of Asian heritage paying the home tuition fee rate, not an international student from Asia. For all gap comparisons, I compare outcomes for the indicated group to White students.

Table 2: Data sources used

Dataset	Source	Years included
TEF ratings	Office for Students	TEF2023
Continuation	Office for Students TEF B3 dashboard	2018/19 to 2021/22
Completion	Office for Students TEF B3 dashboard	2015/16 to 2018/19
Progression	Office for Students TEF B3 dashboard	2018/19 to 2021/22
Awarding Gaps	Office for Students Access and Participation Dashboard	2017/18 to 2020/21
Staff ethnicity	Higher Education Statistics Agency Staff Table 2	2022/23
Student ethnicity	Higher Education Statistics Agency Student Table 5	2022/23

There are some important limitations of these datasets, particularly in terms of data protection applied by the Office for Students. Gap data is redacted if there are fewer than 25 students in either relevant cohort. Some institutions had enough Asian students for an Asian gap to be included, but fewer than 25

Black students so Black awarding gap data was redacted. Within the dataset, there were seven institutions with very small Global Majority cohorts that did not have any student outcome gap data available, so equity of their outcomes cannot be assessed.

The Higher Education Statistics Agency rounds data to the nearest five individuals. This means that a record of zero might actually represent zero, one or two individuals. Very small providers with 50 or fewer students could therefore have proportions of Black students in line with the UK working-age population (4.4%), but their data would show zero Black students (e.g. 4.4% of 50 is 2.2 students, which would be rounded to zero). I therefore exclude providers with fewer than 50 academic staff and fewer than 100 students, giving a total of 200 institutions with a TEF rating and at least one outcome or demographic dataset available. This inevitably biases analysis towards larger providers, excluding most small and specialist providers.

It should be noted that where there are very small numbers of Black and Asian students, this will inevitably increase the amount of statistical 'noise' in the data. Differences in outcomes for a small number of students will result in large changes to outcome gaps at institutional level. Outlying data points may therefore represent either larger institutions with extreme outcome gaps, or may partially reflect statistical noise in student outcomes for smaller cohorts.
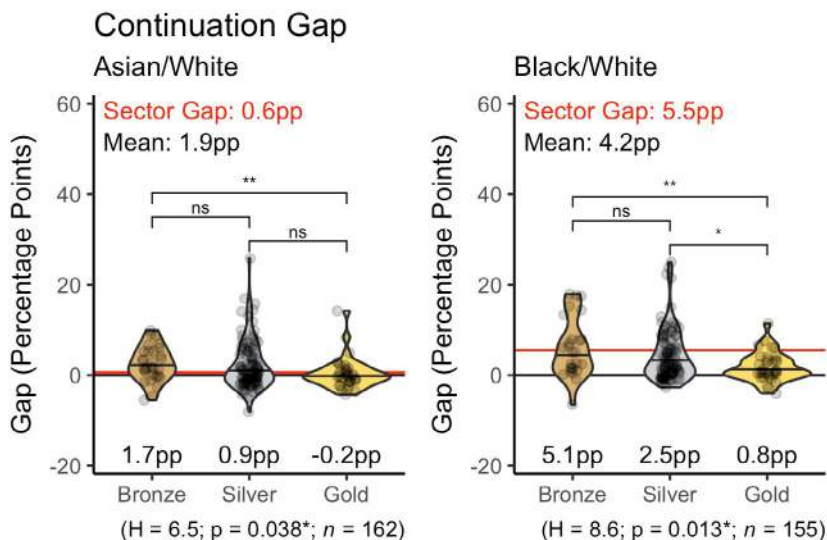
For all analyses I apply relevant statistical tests stated in the figure legend, defining statistical significance as where the probability of the observed result is less than 5% (expressed as $p < 0.05$). Smaller p-values mean the probability of the observed result is lower, i.e. the more statistically significant the result is. I indicate statistically significant p-values ($p < 0.05$) with an *, and highly significant p-values ($p < 0.01$) with **.

Student outcomes

Continuation

For both Black and Asian students, there were significant differences in continuation gaps by TEF rating group, with Gold providers having smaller gaps than Bronze providers (Figure 1). Gold providers had average continuation gaps close to zero, but some providers had gaps considerably above that of the sector.

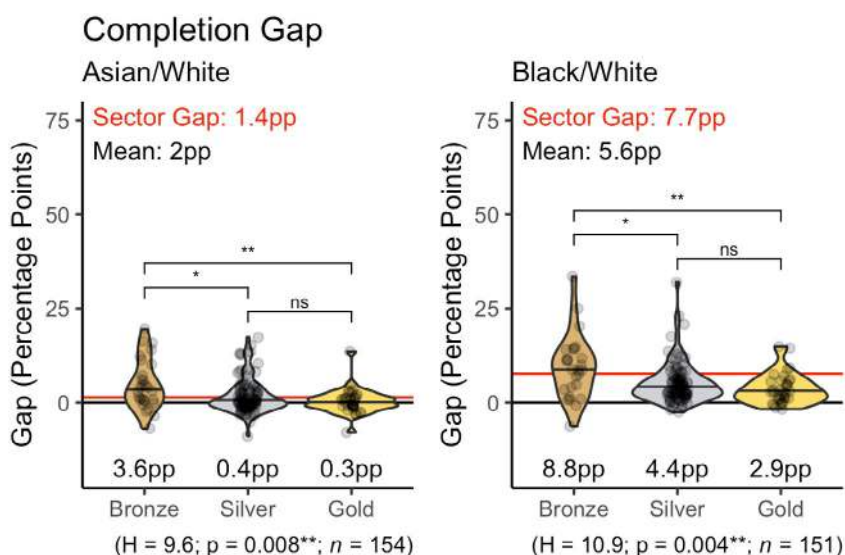*Figure 1: Continuation gaps by TEF overall rating*

*Points represent individual institutions, shapes the underlying data distribution. Statistical annotations below graphs give results of Kruskal-Wallis tests for differences across the three groups, brackets indicate statistical differences between groups indicated. * indicates p<0.05, ** p<0.01, *** p<0.001. pp = percentage points. Sector gap (red line) is calculated by the OfS, including all relevant providers, including those redacted for data protection reasons which are not presented on the graph. Mean presented is the mean for the institutions included on the graph, i.e. those with at least 100 students and 50 academic staff, and with publicly available gap data.*

Degree completion

Degree completion gaps for both Asian and Black students differ significantly between TEF award group (p <0.01** for both gaps). For both the Asian and Black gap, Bronze providers had significantly larger completion gaps than either Silver or Gold, but there were no significant differences between Silver and Gold providers (Figure 2). Again, many individual Gold and Silver providers had gaps well above that of the sector.

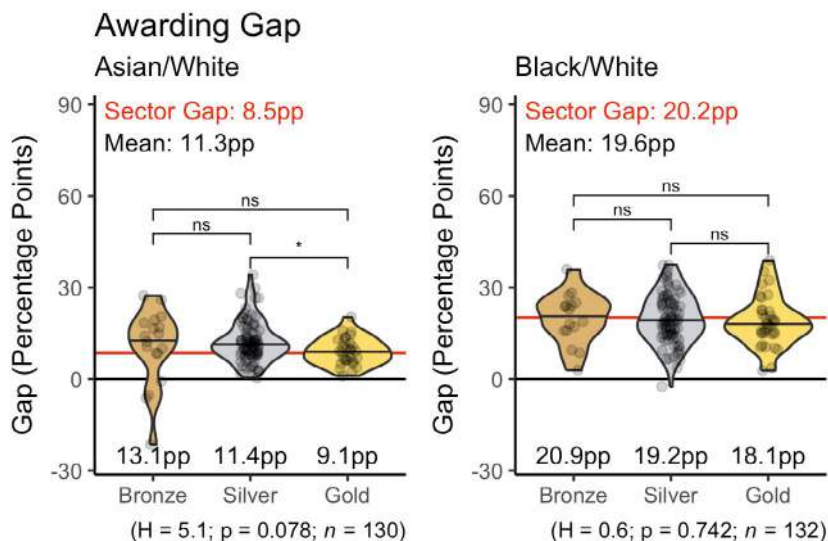*Figure 2: Degree completion gaps by TEF overall rating*

See Figure 1 caption for full explanation of symbols and statistics.

Awarding

Awarding gaps were not included in TEF2023. I therefore compared the Office for Students Access and Participation Plan dashboard data and TEF outcomes. There were no significant differences in the Asian or Black awarding gaps by

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overall TEF rating (Figure 3). Gold providers had significantly smaller awarding gaps among their Asian students than Silver or Bronze providers did. However, there were multiple TEF Silver and TEF Gold institutions with very large awarding gaps, considerably above the sector mean. Of the providers with awarding gap data available, seven out of 47 Gold and 22 out of 113 Silver providers had Black awarding gaps greater than 25 percentage points.

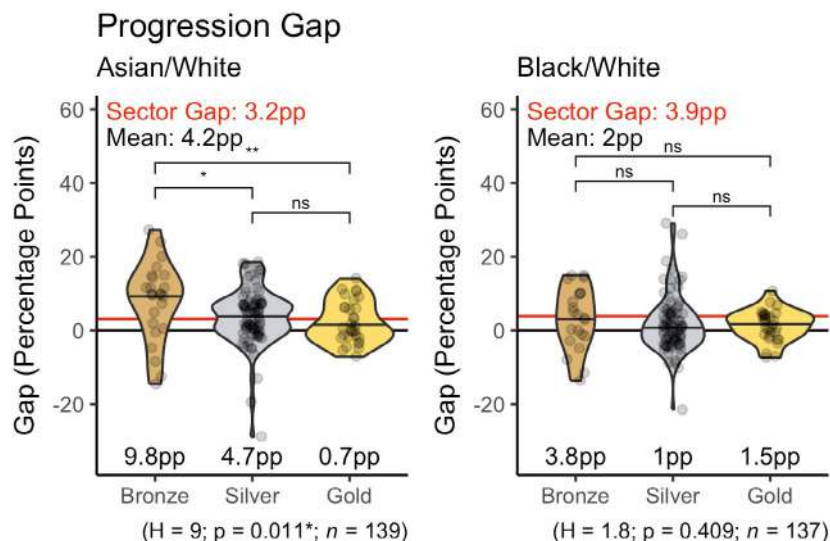*Figure 3: Degree classification awarding gaps by TEF overall rating*

See Figure 1 caption for full explanation of symbols and statistics.

Progression

Progression gaps for Asian students varied significantly by TEF award group (p = 0.011*), with Bronze providers having significantly larger gaps than Silver or Bronze (Figure 4). There were no significant differences between award groups for Black students (p = 0.409).

Figure 4: Progression gaps by TEF overall rating

See Figure 1 caption for full explanation of symbols and statistics.

Staff and student demographics and TEF

I now turn my attention to the demographic make up of institutions for both staff and students. It should be noted that across all English higher education providers, the student and academic staff populations are not representative of the UK working-age population (Table 3). It must be acknowledged that ethnicity questions in the UK 2021 Census were mandatory, while staff and students have the option not to declare their ethnicity. However, I use the UK population to take into account potential under-representation at sector level.

The student population has considerably higher representation of Black (8%) and Asian (13%) students compared to the UK working-age population (4.4% and 10.1% respectively). In the total academic staff population, there are higher proportions of Asian staff than in the UK working-age population (13% compared to 10.1%), but lower proportions of Black academics (3% compared to 4.4%).

Among professors and senior academics (for example, Heads of Department) there is lower Asian and Black representation than in the UK population (8% and 1% respectively).

Table 3: Demographics of UK higher education compared to UK working-age population[30]

Ethnicity	Students	All academic staff	Professors and senior academics	UK working-age population
White	1,480,135 (68%)	168,110 (68%)	20,300 (79%)	30,258,110 (80.7%)
Black	183,690 (8%)	8,395 (3%)	250 (1%)	1,657,235 (4.4%)
Asian	288,030 (13%)	31,640 (13%)	2,060 (8%)	3,787,330 (10.1%)
Mixed	104,515 (5%)	7,015 (3%)	445 (2%)	920,415 (2.5%)
Other	49,835 (2%)	6,680 (3%)	420 (2%)	879,895 (2.3%)
Not known	61,860 (3%)	25,090 (10%)	2,190 (9%)	N/A
Total	**2,168,060**	**246,930**	**25,670**	**37,502,985**

N/A indicates the mandatory nature of ethnicity questions in the UK 2021 Census.

In the interests of simplicity, I will consider under-representation of Global Majority staff and students relative to the UK working-age population. I acknowledge this benchmark is not representative of the higher education population and that it also oversimplifies the complexity of demographic composition, particularly with respect to regional geographic distribution. However, it provides a straightforward appropriate external benchmark for demographic data.

I will not consider over-representation of Global Majority individuals, even though this means that White counterparts are under-represented, which is also inequitable. I justify this on the basis that the consequences of White under-representation are less serious than Global Majority under-representation. However, where significant Global Majority under-representation exists, a student could go through their programme without ever seeing a Black or Asian academic, and have a lack of diversity in their peer network. For Global Majority students, this can negatively impact on belonging, potentially leading to disengagement from studies and ultimately poorer outcomes.[31]
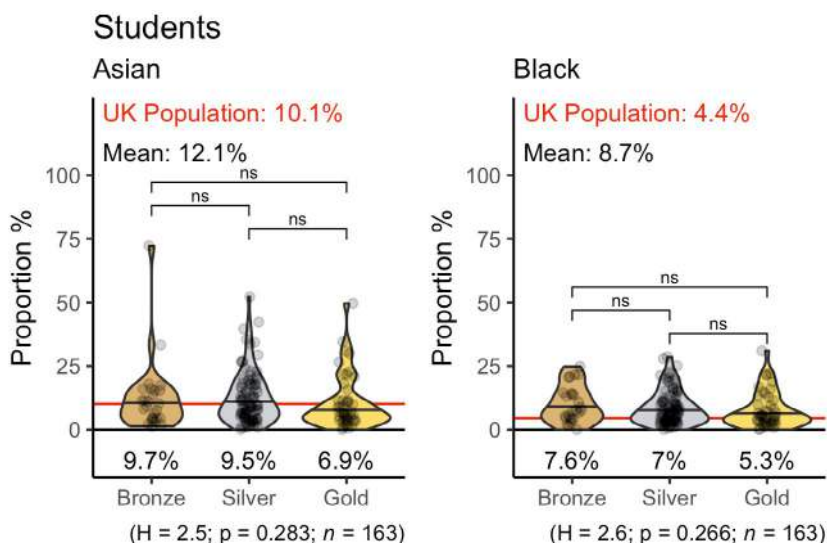
Student demographics

In TEF2023, providers included information on institution type, size and demographic characteristics of students. This is not used to rate the institution but to provide context for other information and student outcome data.

I compile a dataset that includes student demographic data from the Higher Education Statistics Agency (HESA) and TEF2023 ratings. Note that publicly available HESA student ethnicity data include both undergraduates and postgraduates, which cannot be separated out at an institutional level.

There were no significant differences in the proportions of Asian or Black students between TEF Bronze, Silver and Gold institutions (Figure 5). There was a wide distribution between institutions in all groups, with some institutions recruiting a majority of Global Majority students, while others had very low proportions of Black and Asian students.

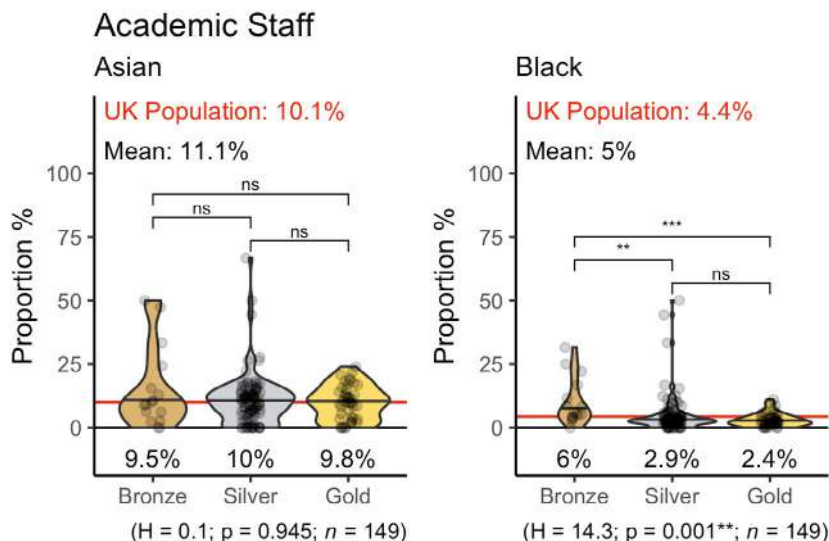*Figure 5: Student ethnicity by overall TEF2023 rating*

Points represent individual institutions, shapes the underlying data distribution. Red line indicates the proportion of relevant group in the UK working-age population. Statistical annotations give results of Kruskal-Wallis tests for differences across the three groups, brackets indicate statistical differences between groups indicated. 'ns' indicates not significant. UK population data from the working-age population in the 2021 Census (red line), mean calculated from all providers included in the figure.

Staff demographics

I also compare Higher Education Statistics Agency data regarding academic staff with TEF ratings to determine if there is a significant relationship. HESA does not provide disaggregated data by ethnicity, academic role (teaching and / or research) and institution in its public datasets. This analysis therefore includes research-only staff who are arguably less relevant to a teaching context.

Figure 6: Academic staff ethnicity by overall TEF2023 rating

See Figure 5 caption for full explanation of symbols and statistics.

Figure 6 gives academic staff ethnicity by overall TEF outcome group. There was no significant difference between TEF rating and the proportion of Global Majority or Asian staff. However, Silver and Gold-rated institutions had a significantly lower proportion of Black academic staff than Bronze institutions. On average, in Gold institutions only 2.4% of academics were Black.

There were multiple individual institutions with very low proportions of Global Majority academic staff, some of which were rounded to zero in the dataset. There were 11 institutions where Asian staff represented fewer than 2% of the total, and 30 institutions where Black staff represented fewer than 2%.

Professorial and senior academic staff

HESA also provide data about the ethnic makeup of professorial and senior academic staff. Of the 123 English institutions in the dataset with a TEF rating and at least 100 academic staff and students, there were 82 institutions with at least 50 professors and / or senior academic staff (Table 4).

Seven institutions had proportions of Asian senior academic staff lower than 5%, and three institutions had no Asian senior academics. In 63 out of 82 institutions, fewer than 2% of senior academic staff were Black. Only eight out of 28 TEF Gold institutions had any Black senior staff.

Table 4: Black and Asian Professors and senior acadmic staff by TEF outcome group

Demographic	Institutional Proportion	Bronze	Silver	Gold	Total
Asian (UK working-age population = 10.1%)	10% or more	3	19	8	30
	5% to 10%	2	25	18	45
	0.1% to 5%	1	1	2	4
	0%	0	3	0	3
Black (UK working-age population = 4.4%)	4% or more	3	6	2	11
	2% to 4%	1	5	2	8
	0.1% to 2%	0	7	4	11
	0%	2	30	20	52
Total		**6**	**48**	**28**	**82**

Only providers with at least 50 professors / senior staff are included. Note that a value of 0% may represent a very small number of individuals that are rounded to zero in the HESA data.

4. A proposal for embedding racial equity metrics into the TEF

I now consider a practical mechanism to incorporate racial equity metrics more directly into the Teaching Excellence Framework. The Office for Students 2025 TEF consultation has indicated that 'a provider would need to deliver consistently high or outstanding quality for all groups of students to achieve a Silver or Gold rating'.

The 2025 TEF consultation indicates that the regulator will focus on providers that do not meet the minimum thresholds for all student groups. It will still be possible for providers to have significant inequity that falls above these minimum thresholds. For example, the minimum continuation threshold for full-time first-degree students is 80%. If continuation for White students is 96% and only 81% for Black students, this still represents a 15 percentage point outcome gap. I therefore argue that inequity needs to be assessed directly.

Here I describe a working model of how this could be implemented. This is not a detailed statistically validated proposal for immediate adoption, but is intended to demonstrate how racial equity metrics could be meaningfully incorporated in the TEF.

I adopt a 'flag' based system, whereby institutions where data exceed a given threshold for either student outcomes or under-representation in demographic composition are flagged as having racial inequity. It is important to recognise these thresholds are active choices which should be subject to rigorous scrutiny and validation if used in practice. In this proposal I will use relatively parsimonious thresholds as examples. Only providers with evidence of substantial racial inequity or under-representation are flagged:

i.   For outcome flags, a z-score for each provider was calculated using the formula:

$$z = \frac{\textit{(institutional gap-sector mean gap)}}{\textit{sector gap standard deviation.}}$$

This gives a measure of how many standard deviations away from the mean the institution was. Institutions where z was greater than one (i.e. the gap was

more than one standard deviation away from the sector mean) were allocated an outcome inequity flag.[32]

ii. For representation flags, the institutional proportion of Asian or Black staff was determined. Institutions where this proportion was less than 40% of the corresponding UK working-age population were allocated an under-representation flag.

To maximise coverage, I use a dataset which includes any institution with at least 100 students and 100 staff and at least one of 12 datapoints available (four outcomes, two representations for both Black and Asian). This includes 123 providers (12 Bronze, 73 Silver and 38 Gold). All institutions have demographic data available, but some only have a subset of student outcomes due to small cohort sizes. Eight providers have no student outcome gap data available.

Table 5 summarises the number of racial inequity flags received by each provider as a function of their TEF2023 rating. Of the 123 institutions with data available for at least one of the 12 indicators, 74 providers received at least one inequity flag, with only 49 having no flags allocated. Six TEF Gold providers have three or more inequity and / or under-representation flags.

Table 5: Number of institutions with racial inequity flags by TEF2023 overall rating

Number of flags	0	1	2	3	4	5	6	Institutions with one or more flags	Institutions with three or more flags	Total
Bronze	3	2	3	1	2	1	0	9	4	12
Silver	34	10	8	10	3	4	4	39	21	73
Gold	12	15	5	2	1	2	1	26	6	38
Total	49	27	16	13	6	7	5	74	31	123

The logical extension is for providers with more than a certain number of flags to see their TEF rating adjusted. I will assume that Bronze providers do not change their ratings, but Silver and Gold ratings can be impacted. Again the methodology includes subjective choices regarding the impact of inequity flags. Five potential scenarios follow.

Scenario 1: Inequity of multiple outcomes is a barrier to TEF Gold

Institutions receiving two or more outcome flags are prevented from achieving TEF Gold. Four institutions cannot obtain TEF Gold (University of St Mark & St John, The University of Chichester, Southampton Solent University and Coventry University).

Scenario 2: Inequity of any outcome is a barrier to TEF Gold

Institutions receiving one or more outcome flags are prevented from achieving TEF Gold. Thirteen institutions cannot obtain TEF Gold (University of St Mark & St John, The University of Chichester, Southampton Solent University, Coventry University, Hartpury University, Anglia Ruskin University, Manchester Metropolitan University, Nottingham Trent University, Sheffield Hallam University, University of Greenwich, The University of Huddersfield, Aston University and University of Derby).

Scenario 3: Inequity of outcomes is a barrier to TEF success

Institutions receiving two or more outcome flags see their TEF rating downgraded by one. Four institutions cannot obtain TEF Gold (University of St Mark & St John, The University of Chichester, Southampton Solent University and Coventry University) and 23 institutions cannot obtain TEF Silver.

Scenario 4: Inequity of outcomes and representation is a barrier to TEF success

Institutions receiving two or more outcome flags and at least one under-representation flag see their TEF rating downgraded by one. Two institutions cannot obtain TEF Gold (University of St Mark & St John and The University of Chichester), and seven institutions cannot achieve Silver (University of Worcester, Bishop Grosseteste University, Falmouth University, University of Suffolk, University of Cumbria, York St John University and University of Gloucestershire).

Scenario 5: Inequity of outcomes or representation is a barrier to TEF success

Institutions receiving three or more flags of any type see their TEF rating downgraded by one. Six institutions cannot obtain TEF Gold (University of St

Mark & St John, The University of Chichester, Hartpury University, Royal Northern College of Music, The Royal Academy of Music and Harper Adams University) and 21 institutions move from Silver to Bronze.

I do not make a judgement on which of these scenarios is most appropriate; this is for the sector and the regulator. However, these scenarios demonstrate that racial inequity can be linked to TEF outcome, and that multiple institutions might fare differently in TEF if they were assessed more robustly on racial inequity and representation.

Individual institutions whose TEF rating would be impacted due to inequity or under-representation are presented in Table 6. It should be remembered that the system proposed here only flags the most significant inequity and under-representation. It should not be assumed that inequity is restricted to these named institutions. Many institutions excluded from this list still have substantive inequity of outcomes that require action.

Table 6: Individual provider outcomes under the proposed scenarios

Institution	TEF2023	Outcome datasets	Outcome flags	Under-representation flags	Total Flags	Scenario 1 — Multiple outcomes inequitable, Gold only	Scenario 2 — Any outcome inequitable, Gold only	Scenario 3 — Multiple outcomes inequitable, Gold and Silver	Scenario 4 — Outcomes inequitable and under-representation, Gold and Silver	Scenario 5 — Outcomes inequitable or under-representation, Gold and Silver
University of St Mark & St John	Gold	5	3	3	6	Silver*	Silver*	Silver*	Silver*	Silver*
The University of Chichester	Gold	8	2	3	5	Silver*	Silver*	Silver*	Silver*	Silver*
Coventry University	Gold	8	2	0	2	Silver*	Silver*	Silver*	Gold	Gold
Southampton Solent University	Gold	8	2	0	2	Silver*	Silver*	Silver*	Gold	Gold

Hartpury University	Gold	2	1	4	5	Gold	Silver*	Gold	Gold	Silver*
Anglia Ruskin University	Gold	8	1	0	1	Gold	Silver*	Gold	Gold	Gold
Manchester Metropolitan University	Gold	8	1	0	1	Gold	Silver*	Gold	Gold	Gold
Nottingham Trent University	Gold	8	1	0	1	Gold	Silver*	Gold	Gold	Gold
Sheffield Hallam University	Gold	8	1	0	1	Gold	Silver*	Gold	Gold	Gold
University of Greenwich	Gold	8	1	0	1	Gold	Silver*	Gold	Gold	Gold
The University of Huddersfield	Gold	8	1	0	1	Gold	Silver*	Gold	Gold	Gold
Aston University	Gold	8	1	0	1	Gold	Silver*	Gold	Gold	Gold
University of Derby	Gold	8	1	0	1	Gold	Silver*	Gold	Gold	Gold
Royal Northern College of Music	Gold	0	0	4	4	Gold	Gold	Gold	Gold	Silver*
The Royal Academy of Music	Gold	0	0	3	3	Gold	Gold	Gold	Gold	Silver*
Harper Adams University	Gold	0	0	3	3	Gold	Gold	Gold	Gold	Silver*
University of Worcester	Silver	8	5	1	6	Silver	Silver	Bronze*	Bronze*	Bronze*
University of Suffolk	Silver	8	5	1	6	Silver	Silver	Bronze*	Bronze*	Bronze*
Leeds Trinity University	Silver	8	5	0	5	Silver	Silver	Bronze*	Silver	Bronze*
Birmingham Newman University	Silver	8	5	0	5	Silver	Silver	Bronze*	Silver	Bronze*
St Mary's University, Twickenham	Silver	8	5	0	5	Silver	Silver	Bronze*	Silver	Bronze*
The University of Cumbria	Silver	8	4	1	5	Silver	Silver	Bronze*	Bronze*	Bronze*
Bath Spa University	Silver	8	4	0	4	Silver	Silver	Bronze*	Silver	Bronze*

The University of Northampton	Silver	8	4	0	4	Silver	Silver	Bronze*	Silver	Bronze*
Falmouth University	Silver	8	3	3	6	Silver	Silver	Bronze*	Bronze*	Bronze*
Buckinghamshire New University	Silver	8	3	0	3	Silver	Silver	Bronze*	Silver	Bronze*
Canterbury Christ Church University	Silver	8	3	0	3	Silver	Silver	Bronze*	Silver	Bronze*
London Metropolitan University	Silver	8	3	0	3	Silver	Silver	Bronze*	Silver	Bronze*
Staffordshire University	Silver	8	3	0	3	Silver	Silver	Bronze*	Silver	Bronze*
The University of Bolton	Silver	8	3	0	3	Silver	Silver	Bronze*	Silver	Bronze*
Birmingham City University	Silver	8	3	0	3	Silver	Silver	Bronze*	Silver	Bronze*
University of Sunderland	Silver	8	3	0	3	Silver	Silver	Bronze*	Silver	Bronze*
Bishop Grosseteste University	Silver	2	2	4	6	Silver	Silver	Bronze*	Bronze*	Bronze*
York St John University	Silver	8	2	2	4	Silver	Silver	Bronze*	Bronze*	Bronze*
University of Gloucestershire	Silver	8	2	1	3	Silver	Silver	Bronze*	Bronze*	Bronze*
Bournemouth University	Silver	8	2	0	2	Silver	Silver	Bronze*	Silver	Silver
The University of West London	Silver	8	2	0	2	Silver	Silver	Bronze*	Silver	Silver
University of East London	Silver	8	2	0	2	Silver	Silver	Bronze*	Silver	Silver
The University of Bradford	Silver	8	2	0	2	Silver	Silver	Bronze*	Silver	Silver
Arts University Bournemouth	Silver	8	0	3	3	Silver	Silver	Silver	Silver	Bronze*
The Liverpool Institute for Performing Arts	Silver	0	0	3	3	Silver	Silver	Silver	Silver	Bronze*

Only providers who would see their TEF rating affected under any of the five scenarios are shown (41 institutions in total, changes to ratings indicated with *). Note that some providers only have a subset of the eight possible outcome datasets available due to small cohorts.

Making Metrics Matter: A more ambitious approach to tackling racial inequity in higher education

5. Discussion and conclusions: A more ambitious regulatory future for racial equity in higher education

The data presented in this analysis should be of concern to a sector that claims to be championing equity. Can an institution with a Black awarding gap of over 25 percentage points really be considered Gold standard? Can the Gold standard experience be one where most students never engage with a Black academic, let alone a Black professor?

The Office for Students has taken some significant steps towards addressing inequity through Access and Participation Plans. There is limited evidence that existing Access and Participation Plan commitments have resulted in material improvements in outcomes at sector level. However, I argue that placing awarding gaps in the APP landscape and not that of the TEF means that racial equity is still not given the high profile and reputational impact it deserves. Every vice-chancellor will know their TEF rating, but I doubt many could name their Access and Participation Plan commitments. To the best of my knowledge, no institution is advertising its Access and Participation Plan commitments on the side of a bus. It is the TEF which is the public shorthand for institutional teaching quality, and therefore it is the TEF that should include racial equity.

Some may question why I am being so hard on some TEF Gold providers in particular. For many indicators, average performance of TEF Gold institutions are within sector norms. But the whole point of a Gold rating is to indicate performance significantly better than the average. Gold institutions should not be following sector norms, but leading the way. I argue that the methodology used in TEF2023 did not sufficiently capture racial inequity. This allowed some providers to be rewarded with Gold ratings despite significantly poorer outcomes for Global Majority students, or substantial under-representation of Global Majority staff or students.

I acknowledge that the model presented in Chapter 4 illustrates how significant racial inequity could be directly assessed in future TEF cycles, not a fully

statistically validated proposal of how this should be achieved. Additional statistical modelling in the development of a full methodology should also include analysis of non-redacted datasets. Validation should also consider if any of the 12 metrics used here are linked significantly to each other, as it may be that institutions are effectively penalised twice for two correlated indicators.

I have restricted my analysis to the subset of providers with publicly available data for each indicator. Due to data protection measures used by the Office for Students and the Higher Education Statistics Agency, this inevitably biases the data towards larger institutions. To implement this proposal at sector level, there would need to be robust protocols to handle small and specialist providers. It may be the regulator is able to use non-redacted data to assess inequity for some additional providers. However, very small providers will always approach the limits of statistical validity. In a provider with only three Black students graduating in a year, the difference in outcomes for just one student could make the difference between receiving a flag or not. Dealing with this robustly is technically challenging. However, given the large number of small providers within the UK, it also seems inappropriate to exempt them from racial equity assessments. The regulator has already adopted protocols to assess outcomes for small providers, so could also include a flag-based system into these protocols.

It should be noted I only attach flags to those providers with statistically significant evidence of inequity; only the most extreme inequity or under-representation impacts on TEF outcomes in my model. Defining thresholds is an active choice that must balance placing appropriate emphasis on inequity with respecting the diversity of providers in the sector. The regulator therefore needs to consider how stringent these thresholds should be, and how appropriate those thresholds are for small specialist providers, or those institutions which recruit from a local population with low ethnic diversity.

I have set a deliberate challenge to the sector in including both inequity of outcomes and under-representation in my analysis. There is widespread acceptance within the sector that demographic-based inequity of outcomes should be addressed and is a valid target for regulation. Demographic representation will be more controversial. I acknowledge that, in benchmarking against the UK population for simplicity, I may be unfairly disadvantaging

some institutions. The ethnic diversity of the UK is not evenly geographically distributed, and there are increasing numbers of commuter students who choose to study in their local area. However, it also cannot be right that some institutions have almost no ethnic diversity in their staff or student population. Such under-representation represents a potential disproportionate loss of Global Majority talent. It also means individual Black and Asian students in these institutions do not have visible role models or peers from their communities, further contributing to feelings of isolation, lack of belonging and potential disengagement from studies. Under-representation also perpetuates stereotypical assumptions that higher education and leadership roles are White spaces, reinforcing the inequitable status quo.

Institutions may rightly argue their admissions and hiring rates are equitable within their pool of applicants, and they are not responsible for the diversity of those applicants. Institutions must, of course, comply with equality and employment legislation and there are multiple factors influencing the diversity of applicants. Benchmarking this demographic data therefore represents a significant challenge: how do we fairly compare elite institutions which recruit from a national population and widening participation institutions which recruit mostly local applicants, both of which fall within an area of low ethnic diversity? This requires the sector to come together and formulate robust approaches. We need ambitious and pragmatic approaches to this issue to ensure all institutions take their responsibilities towards diversity seriously, and students of all ethnicities see themselves represented in both staff and student populations.

Some reading this analysis may already have formulated counter arguments as to how this would be inappropriate or impossible to implement:

❯ 'It is not reasonable to reach that benchmark because the local area is not ethnically diverse'.

❯ 'Global Majority students are not interested in this specialist provision'.

❯ 'The students who apply are not ethnically diverse'.

❯ 'These students do not have the same entry qualifications'.

❯ 'We also need to address socio-economic disadvantage'.

These concerns are important to recognise, and represent significant challenges at an institutional level. However, their cumulative effect results in inaction and ongoing inequity. The sector and regulator need to consider collaboratively how we can pragmatically, fairly and robustly address these contextual issues without compromising on the importance of racial equity and representation.

The Office for Students has indicated that future iterations of the Teaching Excellence Framework will not be in the same format as TEF2023, and embarked on a sector consultation in 2025. There is therefore an opportunity to reshape the TEF to give greater emphasis on key structural issues facing the sector. I argue that racial equity is one of those issues, so call on the sector and regulator to engage with the data presented here to ensure the new TEF ensures that racial equity is evaluated robustly as a key component of teaching excellence.

Conclusions

If racial inequity is a structural issue, we can only tackle it through changing structures. To make progress on the known issue of racial equity, a threshold-based flag-based system could be a pragmatic method. Imagine how much more seriously the sector might take inequity in academic hiring if TEF success depended on having representative proportions of Global Majority staff. Institutions seeing their TEF Gold rating being adjusted to Silver or Bronze on the basis of large persistent ethnicity awarding gaps might take much more meaningful action.

The metrics we use in higher education are active political choices. Which metrics are included and excluded from league tables and regulatory frameworks drive institutional behaviours. Some may strongly disagree with my rationale, and will argue I am placing too much emphasis on one demographic group. However, while our sector has such persistent racial inequity, I argue more direct action is needed. Access and Participation Plans have undoubtedly increased awareness of and focussed action on inequity gaps. However, TEF rating is a higher profile badge of quality that senior leaders and governors understand in terms of institutional reputation and recruitment. The Office for Students has indicated that future TEF iterations will focus more closely on outcomes for all groups of students. I therefore encourage the Office for Students to see this through, and to adjust the TEF methodology to assess institutional equity robustly. If significant racial disparities in outcome or representation are a public barrier to TEF success, the sector may give racial equity the priority it needs and deserves.

Endnotes

1   Use of language in this space is both inconsistent and contested. I recognise not everyone will agree with my use of language, and that the evolving nature of this space means that terminology used here may become outdated. My intention is to use consistent and inclusive language that does not perpetuate deficit models.

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3   I acknowledge that the use of Black and Asian as categories still obscures significant nuance (for example, the experience of Chinese and Bangladeshi individuals may be very different, but both would be categorised as Asian). It is also important to note that in much of this analysis ethnicity is presented only for UK domiciled students. 'Asian' therefore refers to students of Asian heritage paying the UK tuition fee rate who were born and / or schooled in the UK, not international students from Asia. I also acknowledge that ethnicity based classifications are inherently controversial, and have been used to justify historical and contemporary discrimination and oppression.

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Degree Awarding Gaps: Three Years on', 1 July 2022 **https://www.universitiesuk.ac.uk/ sites/default/files/uploads/Reports/closing-the-gap-three-years-on.pdf**

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10 Karis Campion and Ken Clark, 'Revitalising race equality policy? Assessing the impact of the Race Equality Charter mark for British universities', *Race Ethnicity Education*, Volume 25, Issue 1, May 2021, pp.18–37; Kalwant Bhopal and Clare Pitkin, '"Same old story, just a different policy": race and policy making in higher education in the UK', *Race, Ethnicity and Education*, Volume 23, Issue 4, January 2020, pp.530–547

11 Maryam Hussain and James M Jones, 'Discrimination, diversity and sense of belonging: Experiences of students of color', *Journal of Diversity in Higher Education*, Volume 14, Issue 1, March 2021, pp.63-71; Lateesha Osbourne, Julie Barnett and Leda Blackwood, '"You never feel so Black as when you're contrasted against a White background": Black students' experiences at a predominantly White institution in the UK', *Journal of Community & Applied Social Psychology*, Volume 31, Issue 4, April 2021, pp.383-395 **https:// onlinelibrary.wiley.com/doi/10.1002/casp.2517**

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Making Metrics Matter: A more ambitious approach to
tackling racial inequity in higher education

HEPI

Debate

43

Progress towards racial equity in higher education has been notoriously slow. Black and Asian students are less likely to be admitted to prestigious institutions and less likely to graduate with a First or Upper Second-class degree. Black academics are under-represented across the sector, particularly among professors.

In this HEPI Debate Paper, Katharine Hubbard proposes a model linking Teaching Excellence Framework outcome ratings to inequity gaps for four undergraduate outcomes – continuation, degree completion, degree class awarded and progression to higher level study – along with (under)representation of Asian and Black students and academic staff across higher education institutions. By doing so, she presents a call to action for the sector to take bolder structural action on racial equity.