Title: Teaching Excellence Framework in the UK: an opportunity to include international students as 'equals'?

Abstract:

Research on international students in British higher education points to marginalisation of their unique perspectives in university classrooms. The aim of the paper is to consider how the most recent policy changes, particularly the Teaching Excellence Framework (TEF) continue to do so. The article also argues that the TEF, being a major higher education reform, can lead to change in attitudes towards international students and contribute to their more equal status. The paper discusses how this could be done and proposes changes to the TEF that would distance universities from policy moves that have contributed to the 'peripheral' status of international students for many years. Despite being British-based, the analysis has international implications as it points to a series of ways in which the scope and nature of metrics used in national evaluations of teaching quality can affect the status of international students in higher education.

Keywords: International students, TEF, internationalisation policy, marginalisation, equality

Introduction

Research on international students in British higher education points to their marginalisation through various policy moves that have continually represented international students as economic objects, beneficiaries of the education system in the host country, and people in education deficit (Bolsmann & Miller, 2008; Walker, 2014, Lomer, 2016). These representations result in the 'peripheral' or 'inferior' status of their perspectives in the classroom as these perspectives are not considered to be equal to the education traditions in the country of education (e.g. Marginson, 2013). The purpose of this paper is to consider the role of the most recent policy changes, particularly the plans for the *Teaching Excellence Framework* (TEF), in perpetuating such marginalisation of international students.

The TEF was announced in the government's green paper '*Fulfilling Our Potential: Teaching excellence, Social Mobility and Student Choice'* published in November 2015 and later re-affirmed in the white paper '*Success as a Knowledge Economy: Teaching Excellence, Social Mobility and Student Choice'* in May 2016. The plans for the TEF are thought to signal significant changes in UK HE as the TEF will transform the ways in which universities have been evaluated, which will now, alongside metrics for measuring research outputs through the Research Excellence Framework (REF), also include criteria related to teaching excellence. Thus, the TEF will invariably have an impact on how universities work. The governance and teaching practice at universities is now likely to be focused on the metrics that will constitute the TEF as their reputational and financial future will depend on any of the three TEF ratings awarded. The Gold rating, being the highest, will be awarded to universities whose provision is of the highest quality, with emphasis on 'outstanding outcomes for students from *all backgrounds'*, where teaching 'ensures *all* students are significantly challenged to achieve their full potential' (DfE, 2016). The Silver and Bronze ratings represent lower standards relative to the criteria in the Gold category, with outcomes for students being the main criterion of difference in ratings, expecting Silver and Bronze universities to provide good outcomes only for 'most students' (DfE, 2016). The criterion of 'outcomes for all students' is significant here, as the paper goes on to

explain, because the proposed ways of representing university performance in relation to international students do not represent their success in inclusion of the international group as equals.

Metrics that will be used to measure teaching excellence under the TEF include common sector indicators and additional institutional reports submitted by each university, providing evidence of their teaching excellence. The common sector metrics are student employment and earnings data (derived from the Destination of Leavers Survey from Higher Education [DLHE]), student retention and continuation (from national sources kept be the Higher Education Statistics Agency [HESA]) and student satisfaction data (measured by the National Student Survey [NNS]). The metric on student employment and graduate earnings has been particularly contentious in public debates as commentators are not convinced that showing how much students earn and whether they secure graduate jobs after the completion of their degrees can be used as a proxy for teaching excellence (e.g. Grove, 2015). In terms of international students in particular, the debate on graduate earnings returns to arguments from nearly a decade ago which point out that restricting employability data to home students does not represent the whole body of students and it means ignoring internationalisation (Woodley & Brennan, 2000). As will be shown below, internationalisation, understood not only in terms of the presence of international students but also as ability to implement an agenda for integration of international students' perspectives in the classroom (Leask & Bridge, 2013) is also ignored under other metrics in the TEF as, despite the proposals to 'split' the performance on the TEF indicators based on NSS separately for internationals students, equal and respectful engagement with their unique views and perspectives in the classroom is still not considered.

The guidance on submission of institutional evidence of excellence in teaching states that providers should, *inter alia*, focus on demonstrating their engagement with diversity (DfE, 2016). This mainly concerns Widening Participation (WP) groups (i.e. nationals from non-traditional, low income and other under-represented groups such as students with disabilities or adult learners returning to education), with no requirements to consider international students. It has been suggested elsewhere that the emphasis on the WP group may be linked to the 'public good' responsibilities HE in England has towards this group (Author), seen primarily through increasing life opportunities of disadvantaged populations and goals to increase employment of nationals (e.g. McCaig, 2015). These responsibilities do not and have never applied to international students because of their representations in policy as not the responsibility of the UK government (Author). This situation reflects a very narrow understanding of the spectrum of diversity, excluding 'multicultural' diversity which, on the other hand, is so persistently used to market HE in Britain. Thus, the plans for the TEF promise very little in terms of challenging systemic marginalisation of international students, as if international people's perspectives were not valid in their own right. The paper argues that it is in this sense that the TEF functions as a tool perpetuating their marginalisation and proposes that providers' submission of institutional evidence of excellent teaching, as well as the quantitative metrics, if adequately restructured, may offer an incentive to work towards greater equivalence of international students.

The focus on the TEF in this article has been chosen because a major HE reform on a national scale such as the TEF can greatly influence the ways in which universities work. The TEF is also concerned with teaching, which is an area in HE that has been identified as having the greatest potential to transform the relationships with international students and ensure their inclusion as equals (e.g. Spiro, 2014; Spencer-Oatey & Dauber, 2015). When Crowther and colleagues spoke about the need to consider international students' perspectives in the classroom in their seminar work at the

European Association for International Education (EAIE) in 2000, they indicated that intercultural practice giving greater equivalence to international students as people in 'their own right' is essential to challenge the systemic marginalisation of this group that has been created by limits of governments' agendas driven by self-centered priorities and historically-informed attitudes towards foreign people (Crowther et al. 2000). Research, however, persistently shows that policy representations of international students undermine such reformatory potential of university classrooms as no commitment to international people as 'equals' in national policies results in universities choosing not to challenge the socio-cultural and educational realities established for them through policy objectives (Madge et al.2009; Gorski, 2008). Thus, the present representations of international students in the TEF as 'deficient' and in need of 'fixing' and, as the paper goes on to explain, the *nature* and *scope* of the metrics under which they are considered, are likely to undermine classroom practice towards their greater equivalence, as such practice currently does not have the 'backing' from the political power. Thus, despite being British-based, the analysis has international implications as it points to a series of ways in national evaluations such as the TEF can affect the status of international students in higher education.

Bacchi (2009) explains that we (and our universities) are governed through problematisations of an issue (here: international students) in policies. These problematisations have symbolic roots and emerge from the historical and socio-cultural contexts (Bacchi, 2009). Britain's colonial past therefore plays a significant role here as it has contributed to a phenomenon in education affecting international students known as 'coloniality' – that is, the logic of cultural, social and political domination over foreign students in an education system (Ghiso & Campano, 2013). 'Coloniality' prevents critical engagement with foreign students because it is based on the presumption of a 'single path of human progress and of the universal value of Western knowledge' (Stein et al, 2016, p.4). Alternative perspectives of knowledge and modes of learning are viewed as 'inferior' and behind the West in time; hence the persistent education discourses about the need for 'upskilling' international students (da Silva, 2015). These discourses are legitimised through a rhetoric of conditional equality – that is, 'others' can also be successful once their deficit is 'fixed', reinforcing representations of the West as superior and international students as lacking moral and intellectual capacity (da Silva, 2015). Such views also set the rationales for expansion of HE to other nations, premised on the colonial tenets of 'civilising' and helping those less able (Kapoor, 2014). These, in turn, affect the manner in which international students in host countries are approached and internationalisation more generally is addressed. Knight (2004, p.18) argues that this is done differently in many countries because of their differing priorities, cultures, histories and the country's politics.

I review below international student policies in Britain to explore how rationales for their recruitment and British colonial past might have traditionally informed their representations in past policies, and more recently in the TEF. The review shows that motivations for international students recruitment have historically been linked to commercial trade as part of colonisation, which since then have been sustained and presently still include very trade-like constructions of international students. These constructions are equally concerned with export earnings and maintaining neo-imperial soft power. Lomer (2016) argues that one of the key rationales behind internationalisation in the UK is that the country's global political power will be maintained through soft power; a result of the Thatcherian view on international education as a private market good and an asset to the country (Williams, 1984). The paper draws on these representations to explain why mainly 'remedial' work is proposed in the TEF to improve outcomes for international students and how this affects their representations as 'equals'. To support arguments that policy affects attitudes towards and work done for international students, I draw on Simon Marginson's argument that 'political and

legal Othering of globally mobile students by national governments functions as the master Othering process (Marginson, 2013, p.10). Marginson (2013, p.9) posits that othering of international students at the highest political levels amplifies all other forms of Othering, which is why international students 'face violations of equality in all dimensions of public and educational life'.

The first part of the paper shows that the TEF continues to perpetuate outdated constructions of international students. The section aims to elucidate that this may not be intentional but is rather influenced by politically entrenched attitudes that have been traditionally developed in Britain towards this group. The subsequent sections therefore highlight that the TEF should be distanced from the socio-political realities that shape rationales for the presence of international students in England and that the plans for the TEF need to reflect more cosmopolitan approaches. Towards the end of the paper, ideas for the new approach to the TEF are canvassed and suggestions for how aspects of intercultural practice in teaching could function as a metric in the TEF are presented.

Developments in international students policy in England

The analysis below is informed by theorisations that policy formation regarding internationalisation can never be neutral and free from nationally established views about the purposes of specific moves and changes in education (e.g. Room, 2000; Teichler, 2004). Teichler (2004) explains that developments in internationalisation of education are interrelated with national reforms which are strongly shaped by the international status of the country, its language, the economy and the academic reputation of the national system of HE. Teichler (2004) also argues that it is false to assume that the work of universities is more likely to be influenced by the macro-process of globalisation than national governments because the cultural context in which national policies are formed encourage specific attitudes towards international students, and subsequently, the nature of educational activities concerning them. It is therefore important to consider the historical reasons for the expansion of British education abroad, the status of English education that has been established through this expansion, as well as more contemporary rationales for internationalisation to explain why overseas students in Britain may have been positioned in HE as 'inferior' and 'other'.

Pietsch (2012) links the 'inferior' positioning of international students to Britain's colonial past and concurs that imperialist expansion contributed to perceptions of international students as 'beneficiaries'. Pietsch (2012) argues that forms of HE internationalisation in 19th century have much to explain about the current views on the presence of international students in HE today. British education was mandated in many colonies during colonial times and the aim was to sanction ways of acquiring knowledge to gain control over the new land and people (Pietsch, 2012). Walker (2014) refers to such expansion as institutionalisation of British superiority as by the turn of the 20th century, students from many colonies were required to study for a degree from the University of London. The fact that students could obtain London degrees on passing exams that did not require them to attend classes in London was also marketed as an opportunity for a colonial student to access the best of British education in their own country (Pietsch, 2012). The prestige attached to these degrees and the obligation to have them for certain civil service positions, as well as the views that degrees gained in students' own countries, despite being awarded by British universities, did not have equal value to those awarded in London, resulted in many students arriving in England. However, following their arrival, many colonial students had to confront growing hostility as tensions related to shortage of housing and fear from immigration related to increased numbers of international students were growing (Walker, 2010).

Additionally, when in 1967 Britain moved from a system of funding overseas students based on public subsidies to a strategy based on higher fees for international students (Bolsmann & Miller, 2008), the nation created a form of dualism in HE that separated home and international students into 'us' and 'them'(Williams, 1984). International student limits were introduced in 1977 to further reduce the amount of subsidy for international students (Bolsmann & Miller, 2008). The biggest change came in 1980 when Britain introduced a full-cost policy for overseas students, meaning that full fees had to paid by international students and all grant support from British institutions was removed (Williams, 1984). This could be seen as confirming the final status of international students as 'the other' group in HE, causing shifts in attitudes towards them, from perceptions some traditional universities might have held as enhancing Britain's intellectual capital to being a source of revenue. Silver & Silver (1997) explain that since the first differentiation of fees for home and international students in the 60s, the value of overseas students for intellectual development and life at universities has been reduced to economic benefits.

Positioning of international students as sources of income and economic gain was sustained in government policies in later years. The Labour government in 1997, in particular, was focused on the long-term political and economic benefits of the presence of international students in the UK which, under investments known as Prime Minister's Initiatives (PMI), commissioned a number of economically viable strategies such as streamlining entry procedures and work rules to increase the numbers of international students in Britain. It needs to be noted also that alongside reforms to increase economic benefits, funding for international students experience projects was also made available under PMI to gain insights into their experiences and to conduct research on teaching international students. The Coalition government that succeeded Labour in 2010 officially ended PMI and published the International Education Strategy (IES) in 2013 which focused primarily on income from education exports and capitalising on economic and soft power opportunities available through international students. The strategy highlighted UK's history and brand, as well as its leading position in international education as assets benefiting international students and countries abroad (BIS, 2013). The Coalition also toughened up immigration rules streamlined by Labour, re-introducing, for instance, border interviews and ending the right to work for international students post study. These changes were happening in the political context increasingly positioning international students as 'abusers' of the system, to an extent that even their economic value for Britain was being questioned by some immigration ministers (Grove, 2012). Presently, the Conservative government is making further plans to restrict visa awarding powers for 'low quality' HE providers, a strategy said on the one hand to protect international students from fraud but on the other reported to be a 'cover for wanting to stop *anyone else* from coming [to the UK]'(Hillman 2016, p. 26). Brexit may result in these restrictions also being applied to EU students who presently are able to exercise the same immigration and study rights as home students but may no longer be able to do so after the UK leaves the EU.

Williams (1984) argues that once established, the *status quo* regarding the political voice in relation to international students is difficult to change. Supporting this view, Lomer (2016) observes that the UK policy on international students has remained stable over the last 15 years, continually fossilising public and sector's attitudes towards this group as consumers, vectors of income and a homogenous category that does not have agency. The paper argues below that unless relevant changes are made to the TEF, these attitudes will remain and the imperial and economic echoes will not incentivise goals at universities to work towards greater equivalence of international students in the classroom.

The TEF, marginalisation of international students and role of policy in ensuring their greater equivalence

National education policies invariably have an impact on the ways in which universities operate. The conditions that national governments set for universities in their policies prompt actions within institutions to achieve specific policy goals, especially if meeting them means gaining prestige in evaluations such as the TEF and better financial standing. For instance, recalling the actions that universities took following the changes in financing international students, Williams (1984) lists redesigning academic offerings, more 'energetic' recruitment and improvements in social and educational facilities for international students as responses to the dual-funding regime, as the new system opened up opportunities for greater income from overseas student fees. More recently, Scott (2011) pointed out that similar changes in universities nowadays reflect strategic decisions by HEIs managers that follow the government's thinking which positions internationalisation mainly as vectors of competitive advantage. Walker (2014, p. 341) concludes that this unfortunately means that 'international students are vulnerable to betrayal in these political games' because it all depends on what the 'problem' *for* them and *with* them is represented to be (Bacchi, 2009).

The problem *for* international students is represented in the Green paper as related to restrictions that might be put on providers' degree awarding powers because this will have two consequences for international students: a) their choice of university will be limited by visa restrictions, this point being particularly affected by the latest Home Office's plans to restrict visa licences for 'low quality' providers, and b) their education may be disrupted if their current institution fails to meet the quality assurance requirements. (BIS, 2015, p. 47 -55). International (as well as home students) will therefore be protected by the *consumer* law under the regulatory guidance by the Competition and Markets Authority (CMA) to protect them from fraud. This strategy, however, has dual aims– to ensure that international students experiences in Britain are more positive but to also to 'safeguard the strong international reputation for English providers' (p.57).

The problem *with* international students continues to be represented based on the outdated ideas of 'deficit' and 'beneficiary'. As it is recognised in the Green Paper (BIC, 2015), 'England's world-class higher education system is open to anyone with the potential to benefit from it' (p.36) and that 'not all students will achieve their best within the same model of teaching' (p.21), which is why 'all students receive effective support in order to achieve their educational goals and potential' (p.33). Similar discourses are also evident in the white paper (BIC, 2016), in sections declaring that the government will 'continue to meet the needs of international students who increasingly demand access to top quality higher education, and help contribute towards boosting education exports' (p. 9) because the government recognises that 'our higher education system is internationally renowned, something that is reflected by the high number of students who wish to come here to study' (p.32). Such problematisations of international students therefore prompt policy objectives to offer language and remedial support which, while having some legitimacy because many systems around the world prepare students differently for their university education than schools in the UK, also reinforce representations of international students as 'deficient'.

There are ethical implications of such representations because they do not acknowledge international students' agency (Lomer, 2016). This is despite research suggesting that international students are active agents in HE that manage their university experiences through 'resourceful' behaviours stemming from change (e.g. edited volume by Sovic & Blythman, 2013). Denying them the right to exercise this agency and assimilationist policy objectives are thus highly damaging for international students and policy moves that dictate these objectives create specific expectations of international students to adapt in the classroom that affect pedagogical relationships in a way that

disadvantages them (Lomer, 2016). But this form of normalisation of international students' unique perspectives goes unnoticed. It is therefore even more dangerous than more overt acts of discrimination that would otherwise most likely trigger an immediate public reaction and an appropriate political response, had international students were considered more 'important'.

Lack of fairness and equal treatment also affect international students beyond classroom walls. Whilst it is beyond the scope of this paper to discuss this fully, it needs to be mentioned that both the White and Green papers sustain the effects of unequal conditions for international students already created by the dual funding regime or visa and immigration regulations. The higher fees that international students have to pay already disadvantage them in terms of enjoying the same benefits of study as they have to pay more for the same education home students pay less. And while charging international students higher fees might have some legitimacy as they, due to their 'non-domiciled' status, do not contribute to the economy in the same way as British citizens do, it also reinforces perceptions that unfair fees are acceptable because international students are the 'other' group that is not nationally -bound to the country of education (Marginson, 2013).

In terms of the objectives of this paper, the real devil, however, lies within discourses surrounding aspects of teaching and learning in the TEF. Author's earlier work concluded that the current metrics regarding teaching and learning marginalise the unique learning behaviours of international students as well as their interpretations of the curriculum under tools such as the NSS. Author argues that the NSS reflects what is best in the British system but does not capture that understandings of 'best' varies across different nations, reflecting aspects of 'coloniality' through positioning home pedagogies as normative. And again, while it is acceptable to expect international students to understand and adapt to the teaching and structural requirements of the education system in the host country, as this ultimately affects their progression, it is not acceptable to culturally dominate, leaving no room for equivalence of alternative views.'Coloniality' that prevents considerations of such views in tools such as the NSS (Author) affects international students in that it requires adjustments beyond structural factors 'to the extent students discard their beliefs and adopt values and behaviours of host-country norms' (Marginson, 2013, p. 12). It also invokes understandings that change is one directional, that it mainly happens on the part of international students, while the host institution remains unchanged (Marginson, 2013). This has implications for what institutions understand their role should be in relationships with international students- namely, to provide remedial support so they acquire home students' characteristics as quickly as possible. Such understandings create the cycle of marginalisation of international students, whereby discourses of superiority of British education tradition, HE policy objectives and nationally-focused classroom practice feed one another.

As policy discourse engenders particular behaviours at universities, and when underpinned by a reductionist view on international students as economic objects and the 'other' it undermines more respectful relationships in the classroom (Madge et al, 2009), it can also have a positive effect on the marginalisation cycle and has the potential to transform the nature of current relationship with international students into more critical ones. This will happen if the rhetoric surrounding international students that travels from policy to universities is changed (Knight, 2004; Teichler, 2004). The TEF can change this rhetoric by including metrics that will require considerations of whether international students are treated equally in the classroom and how staff promote intercultural relationships. As Marginson (2013) explains, institutions are more willing to adjust if international students are not positioned as 'other' in national policies. Presently, the dual financial and immigration regimes resulting from imperial echoes, as well as associated constructions of

international students as beneficiaries, vectors of income and a group that is in educational deficit amplify this positioning. The liaison between national-level interpretations of the benefits and reasons for the presence of international students and institutional responses to them plays a role in these representations, especially, when the internationalisation process is 'top down' (Knight, 2004). It is probably accurate to say that in case of England the internationalisation process has always been 'top down' because it stems from overwhelmingly top-down politics of colonialism and attitudes of superiority. Following Knight's (2004) logic, therefore, it would probably also be accurate to say that if policy advocates for greater equivalence of international students, this will translate into more democratising actions within universities and contribute to change in attitudes. It has been observed elsewhere that government policies establish national attitudes towards internationalisation, and thus international students, and set the frames for any developments in this area at universities (Teichler, 2004). Consequently, including metrics in the TEF that will assess whether universities are working towards greater equivalence of international students is likely to become an incentive for universities to do that. Such metrics will create policy spaces for international students beyond representations of deficient, vectors of income and being somewhat 'peripheral' to HE. It will also help institutions distance themselves from the negative political, economic and social attitudes that have marginalised international students for many years.

So, what could these metrics be?

Author has previously proposed that including relevant aspects of internationalisation as a metric could lead to greater equivalence of international students (Author). This section considers in more detail this broad recommendation, seeking to describe the *nature* and *scope* of metrics that could lead to more equal engagement with *all* student identities. It seems appropriate to theorise this discussion by drawing on cosmopolitanism in HE (Rizvi, 2009) as inclusion of students in cosmopolitan learning, just as truly intercultural education requires it, involves greater equivalence of perspectives developed beyond the nation state and aims to develop in students attitudes that encourage more progressive engagement with international people (Leask & Bridge, 2013; Leask & Carroll, 2011). This does not mean that international students should be treated differently. Rather, they should be treated 'equally'. Metrics in the TEF should therefore capture engagement with diversity that represent transformations which acknowledge the relationalities that surround changes in host communities that are becoming more and more hybrid through their interconnectedness with global people (Rizvi, 2009). This of course also has benefits for home students because they learn to understand their subjects and HE experiences in an international context (Crowther et al. 2000).

But for these transformations to be captured effectively under the TEF metrics and to have value in working towards greater equivalence for international students, splitting university performance on the core metrics based on NSS by student 'domicile' (UK, EU and non-EU), as it is currently proposed in the plans for the TEF (DfE, 2016), is not sufficient. The rationale behind such 'splitting' is to incentivise universities to address inequity amongst different student groups (DfE, 2016), but splitting the NSS metrics will only show how well universities perform in the international students category. While such 'splitting' is welcome as a separate category of performance for international students can be seen as the first step towards acknowledging their impact on HE, simply looking at the difference in NSS scores for home and international students will not motivate institutions to ensure greater equality for the latter. Universities are instead likely to intensify the remedial

support for international students as, despite research showing that international students thrive when the freedom to exercise their own agency is enabled by democratising social relations in the classroom (Marginson, 2014; Spiro, 2014), most reactions at universities to unsatisfactory learning experience are still linked to the perceived socio-cultural and academic gap (Zhou et al. 2008). Additionally, poor or good performance in the 'split' category for international students is also likely to inform, strategically, international recruitment decisions; both reactions likely to perpetuate the same views of international students as economic objects and as deficient.

Work towards greater equivalence of international students can on the other hand be prompted if the TEF metrics encompass the social complexity of intercultural relations in the classroom and the ways in which these relations are engineered by university tutors. The best way to assess how much impact university tutors have on interaction outcomes would be through experimental designs such as Randomised Controlled Trials (RCTs), as they are presently thought to be the most robust methodology that can 'tease' out the contribution of a specific pedagogical approach to student outcomes (Spybrook et al. 2016). RCTs however could be very difficult to implement due to the complexity of the design and operational matters. They could also cause some ethical issues as evaluating contribution of more inclusive pedagogies to international students' outcomes through RCTs would mean that certain student groups could be disadvantaged as they would not be able to take part in the intervention.

But universities should do the best they can, working within the constraints of the data that are available or that can be collected across the sector. If the NSS is to be used as the core metric under which international students will be considered in the TEF, it needs to contain additional questions about whether their unique perspectives and learning behaviours are respected and encouraged in the classroom. If scores on these are low, this will then prompt universities to improve this component of student education. Adding such questions to the NSS would also create data on the intercultural component of internationalisation, an aspect that is not currently measured in official rankings that are mostly based on countable and structural measures such as home-international student ratios or numbers of internationally mobile staff (Seeber et al. 2016). Having an 'intercultural component' as an indicator of internationalisation in the classroom could too prompt more democratising pedagogies for international students as official rankings drive strategic decisions at universities. If expanding the NSS with additional questions assessing the ways in which more respectful and reciprocal engagement with international students is established was deemed not operationalisable, there are existing national tools such as the UK Engagement Survey (UKES) which already contain questions about peer-to-peer learning, connecting with others and interaction with staff.

The analysis of these data would also be crucial here. It needs to go beyond the current TEF proposals of aggregating scores under the 'domicile' category to see if universities' performance is significantly different from the benchmark (DfE, 2016). Demonstrating whether a university is below or above the expected benchmark is not a measure of their success in terms of establishing more critical relationships with international students. The analysis therefore needs to encompass the *relational* nature of student individual characteristics, as well as teaching and other organisational factors to then assess the contribution of the relationship between them to more inclusive intercultural interaction in the classroom (Engberg, 2004). To assess this contribution multiple regression and multiple modelling analyses of student data as well as work done towards greater equivalence of international students could be conducted. Student data could for instance include variables related to student satisfaction scores with course design measured through the NSS or their domicile, as students from different backgrounds are often differentially affected by

educational interventions (Engberg, 2004). Measurements of the work done towards greater equivalence of international students could be extracted from the new NSS questions or other measures suggested above. The outcome of inter-culturality in the classroom, measured as an indicator of fostering of successful relations between local and international students could then be predicted by, for instance, calculating the average amount by which the level of inter-culturality changes for a unit increase in NSS scores. Such analyses would enable universities to determine the extent to which more inclusive intercultural practice is associated with, for instance, student satisfaction on the course, their personal characteristics and, most importantly, the characteristics of the teaching process.[1]

There is also scope to demonstrate how universities work towards greater equivalence of international students in the provider's submission of evidence of excellent teaching. The purpose of providers' submission of institutional evidence is to supply critical detail about the environment supporting student outcomes and the emphasis is on evidence of 'teaching that provides an appropriate level of contact, stimulation and challenge, and which encourages student engagement and effort (DfE, 2016, p. 19). The provider's statement could therefore be used to complement the statistical analysis of the core metrics and could be a space for universities to provide information about how tutors facilitate intercultural dynamism in their classroom because 'intercultural education does not just happen and intercultural skills do not just emerge – they each need to be nurtured and developed' (Spencer -Oatey & Dauber, 2015, p.9).

Finally, as student voices are also encouraged to be included in the provider's submission (DfE, 2016), it is a unique opportunity to give international students a political voice. It has been observed elsewhere that routine normalisation of international students' voices under national perspectives in the classroom goes unnoticed because it does not have the 'backing' from the political power (Author). Lack of policy requirements to address the problem of such tacit marginalisation may be contributing to unwillingness at universities to do something about it as educators become socialised and governed by only those problems with internationalisation that are represented by policy (Gorski, 2008). In the UK, these problems are mainly linked to maintaining high levels of recruitment and flows of research income (Schartner & Cho, 2016). Requiring universities to consider student submissions in terms of problems of discrimination in the classroom in their provider statements and writing a response, to which they will be held accountable, could on the other hand prevent such issues from going unnoticed. Above all, it would prompt moral improvement and the whole TEF exercise could become a means for invigorating actions towards inclusion of international students as equals.

Conclusion

As both Williams (1984) and Pietsch (2012) predicted, the philosophical and organisational dualism marginalising international students that Britain's colonial past and differing policy objectives brought about has not been ironed out. When the next challenge comes, for example, connected with Brexit as its effects are already felt in the decreased motivations of international students to apply to UK universities (Laird, 2016), the government will wonder how best to solve these colonial effects. It has been suggested above that one way to do it would be to distance the latest policy objectives from the politically entrenched attitudes towards international students as this will focus

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[1] Of course, any of the variables x could be expanded here to include additional institutional characteristics such as structural diversity, climate for diversity, and instructor characteristics and their teaching styles, provided appropriate measures of these exist nationally.

attention of universities on invigorating the inclusion of international people on more equal terms. While it is not claimed here that some universities do not already work towards such goals, it is suggested that the TEF metrics assessing how universities work towards greater equivalence of international students would hold them to account to do it even better. As noted above, present policy moves do not afford international students a political voice and do not incentivise adequate pedagogical approaches for more inclusive higher education. Marginalisation of international students' unique perspectives and learning behaviours therefore goes unnoticed as a result. The TEF, and similar reforms elsewhere, therefore present a unique opportunity to transform relationships with international students, but this requires thinking about the *nature* and *scope* of metrics that they include. The nature and scope of these metrics should not measure the ability of universities to simply score above a given benchmark in the international students category but it should rather assess whether they are able to implement an agenda for international students' integration carried out with sensitivities to alternative perspectives. Creating such an agenda is very difficult and can be achieved only by teachers with highest levels of intercultural skills. This cannot be ignored when quality of education is measured.

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