

EPC degree classification consultation response with significant input from the Engineering Council and the Royal Academy of Engineering.

1. Does the adoption of a UK sector-wide statement of intent represent an effective approach to meeting the challenges outlined in the report?

a. Yes

b. No

c. In part

Please explain your response.

The adoption of a UK sector-wide statement of intent is an effective approach for universities to show willing to address a policy and media *perception* that grade inflation is a problem.

However, we disagree that the evidence reported in this consultation necessarily signals grade inflation; a rise in higher degree classifications which cannot be explained by the data readily available is not necessarily a problem per se.

There are many reasons – not accounted for in the statistical model – for the degree outcome uplift recorded in the report, not least the massive expansion of student numbers in the last 20 years (leading to a less socially constrained pool of students); greater awareness of student support needs; the increased cost of higher education to students; more incentivised and focused students; and improved teaching in both schools and universities. The evidence of improvement in teaching (and the development of pedagogy in UK universities) is much stronger than the evidence for grade inflation.

A UK sector-wide statement of intent should refute unfounded assertions about grade inflation (without denying the possibility), should acknowledge that there is clearly evidenced improvement in pedagogy in recent years, and should make it clear that the sector intends to *prevent* grade inflation from happening in future.

Higher education (HE) is the gold standard in the delivery of engineering skills in the UK and has a strong international standing and reputation. In part this is due to the accreditation of engineering degrees and, through international engineering accords, the international recognition of accredited degrees. More broadly the excellence of UK higher education derives from the autonomy within which our universities operate, which allows for greater innovation, diversity, and suitability to wider selection of students. Attempts to deal with the challenges outlined in the report must preserve this autonomy.

There is a risk that this initiative may both undermine the efforts of academics and of students and internationally devalue UK higher education. The impacts of this would include a threat to the continued recognition of UK engineering degrees, which would undermine UK engineering graduates working in international contexts and international students wanting to study in the UK under international accords.

2. What other approaches could be explored to address the issues at a UK sector-wide level?

The public's confidence in the integrity of academic standards in the context of improving student attainment would be better served by highlighting when we're doing well. As well as seeking to better understand institutional behaviour, the whole sector should talk more about innovation in teaching, learning and assessment.

An innovative communications campaign to cite evidence of improvement in the sector would be more assertive than a UK-wide statement which implicitly accepts the premise that improvement in grades is due to unjustified inflation.

We would welcome further work to explore other approaches, which are more fit for purpose than the degree classification system. Moving to a universal Higher Education Achievement Record (HEAR), as outlined in the [Burgess Review](#), would, for example, be more appropriate and less susceptible to any grade inflation than the current system. The engineering community would strongly support a multi-dimensional approach to assessment which would allow for recording what has been achieved by each student with greater granularity. This approach would undermine incentives from league tables and elsewhere that encourage grade inflation and force institutions and employers to take a more holistic view of the real suitability of individual graduates rather than using degree classifications as a heuristic proxy of achievement.

In particular, the reflection of more complex strengths than a one-dimensional grade offers would be more useful in working towards employer recognition or professionalism, particularly in engineering and other subjects in which the curriculum and assessment focuses on competences.

We would also be interested in the findings of the HEFCE GPA pilot, which may also offer helpful insights regarding alternative approaches.

In engineering we are increasingly concerned by HEI regulations related to student progression permitting [compensation and/or condonement](#) of modules. Professional Engineering Institutions (PEIs) accredit against a threshold (pass) standard. If students are able to graduate without passing all modules, that is without achieving all the [AHEP](#) learning outcomes, this is likely to impact upon 'grade inflation' and could allow individuals to graduate after failing essential components of a degree. It would be preferable to move to a system whereby universities can, if necessary, continue classifying their student's achievements using the traditional classification, according to their preferred algorithm, but would also be obliged to publish the student's marks across all years of study.

3. What do you consider a reasonable period for a provider to review its practices and enact appropriate changes?

There will need to be a reasonable amount of time – which we estimate to be at least eighteen months – to enable changes to be enacted in relation to issues such as accreditation.

4. How can the statement of intent be taken forward by the different national higher education systems of England, Wales, Scotland and Northern Ireland within their national quality and regulatory frameworks?

Ideally differences should be minimised – employers complain about differences in the education systems when they have staff working in different UK nations and/or a mobile workforce.

We would welcome transparency. Where differences exist, these should be explicit and clear.

5. Are the evidence areas proposed at Table A for inclusion within a 'degree outcomes statement' appropriate for supporting an institution to identify potential 'grade inflation' risks and provide assurance to maintain public confidence?

a. Yes

b. No

c. In part

Please explain your response.

We propose that the evidence areas should focus on institutional improvement in teaching, learning and assessment rather than reviewing and publishing evidence on their degree outcomes. The assumption that institutions need to account for grade inflation rather than educational improvement is perverse.

Of the evidence areas proposed, we do not believe any should be essential. Best practice suggestions could be adopted, if relevant, but not mandated.

We have particular concerns with the use of an institutional level grade profile; the use of subject level profiles should be explored. Subjects have different patterns of outcome for a number of reasons additional to the demographic differences explored in the report. There is evidence (acknowledged by the research) that market forces; course enrolments; progression rules (e.g. progression from BEng to MEng requires achievement of marks for the first two or three years of study suggesting a minimum 2:1 standard, and therefore likely transfer of the best students away from the BEng); and the marking processes adopted by different subject areas impacts the proportion of upper degrees between subjects. While the research supporting this consultation purports to have found no correlation between subject and grade inflation (in so far as it has not accounted for improvements in teaching and learning which will vary by subject) there will be distinct differences in institutional practices at subject level which are ignored by the use of an institutional grade profile.

It is difficult to benchmark standards without some form of national assessment. Any provision of grade profile information, whether at institutional or subject level should be treated with caution and should not be an institutional role. Where used, it should be collated centrally (by OfS, perhaps) to ensure consistency in methodology and resourced centrally to reduce the burden on providers. Only an assessment of the profile(s) should rest with the institution. In order not to perpetuate the existing perceptions of inflation, the information would ideally not be available to league table compilers. However this, of course, is not a feasible restriction. The main effect of making institutional profile public would be the publication of league tables which in turn creates a strong incentive on institutions to inflate grades in order perform better.

6. Do you consider there to be merit in gaining assurance from an 'external advisor on academic standards'?

a. **Yes (please explain your response)**

b. No (please set out any other mechanisms for enhancing external assurance)

This is desirable if effective and resource-efficient alternatives cannot be identified. It would compromise autonomy if this were a requirement or expectation. It should be just one approach to improvement.

Essentially, the focus should be on incentivising the desired outcome rather than the imagined process of achieving it in order to discourage "gaming".

Note that, if degree accreditation is expected to have a role here, within engineering and many sectors where PSRBs operate, accreditation is focused on the threshold rather than degree

classifications (although unusual practice might be picked up on by accreditors). Further programmes may not be accredited for reasons that have no relation to quality. For example, if programmes are new, accreditation may simply not have happened yet or, if provision is particularly tailored to individual learners, there may not be sufficient commonality in learning outcomes to enable accreditation.

7. What are the:

a. opportunities and/or

b. challenges

associated with including the commitments to strengthening the external examiner system in the statement of intent?

Our understanding is that the external examiners' remit does not have a specific aspect related to degree classification. If the HE sector does want external examiners to look at this it should perhaps be more explicit. There is potential benefit from extending the role of external examiners, but this must be balanced with the need to preserve institutional autonomy.

8. What are the:

a. opportunities and/or

b. challenges

associated with enhancing components of the UKPSF relating to external examiners?

We hugely value the UKPSF and it is an excellent way of proceeding. The USPSF represents a sensible balance of institutional ownership and a common understanding of what good looks like.

9. What are the barriers to implementing the recommendations in 'Understanding degree algorithms', particularly the publication and explanation of degree algorithm practices?

We support the transparency of a degree outcomes statement in principle, including of best practice publishing of degree classification algorithms and changes made. However, the complexity of this aim should not be underestimated. We note that the [Higher Education Academy \(HEA\)](#) found that nearly half of the institutions it surveyed in 2015 (98 in total) changed their award algorithms in the previous five years so as not to disadvantage students in comparison to those in similar institutions. An unintended consequence of this as a requirement could be a lack of will to make changes going forwards. A requirement to publish degree classification requirements at the start of each course, and to commit not to change these for that cohort, would be more helpful.

10. Should the statement of intent contain a provider's explanations of:

a. weighting of marks? Yes/No

b. 'zones of consideration'? Yes/No

c. 'discounting' low performing modules? Yes/No

d. PSRB influences on algorithm design? Yes/No

Please explain your responses.

As above (6a): None of the above should be mandated, but best practice might include some or all of these, as deemed appropriate by the institution.

It is unclear if this question relates to the national statement of intent (as indicated) or the institutional degree outcomes statement. Further clarification is needed.

In relation to d. it may be useful to note that that PSRBs are not engaging in this particular dialogue because of the threshold marking approach typically employed. Engineering curriculum and assessment focuses on competences and employ criterion referencing and PEIs accredit against a threshold (pass) standard. Excepting our increasing concern that compensation and/or condonement of modules might create potential for students to graduate without achieving all the AHEP learning outcomes, the approach does not impact on university regulations.

11. Does the proposed classification description in Annex A provide an appropriate reference point for degree classification practice?

a. Yes

b. No

Please explain your response.

Notwithstanding our earlier comments that degree classification practice is not fit for purpose, this is a useful reference point.

We would point out that not all degrees relate to a profession. Moreover, professional competence is quite a technical turn of phrase meaning different things to different professions. In engineering, a degree marks progress towards professional competence, but competence is only conferred at point of registration (post graduation and after some work-based experience). This would not be the same for, say, nursing.

12. Do you have any proposals for substantive changes to the classification criteria?

Please explain your response.

The classification criteria does not currently include information on what an Ordinary degree pass looks like (without honours). A degree without honours can be accredited as providing the underpinning knowledge and understanding for professional registration as an Incorporated Engineer and recognised internationally through the Sydney Accord.

Consideration should be given to how a credit-bearing year abroad works. This is a good example of why HEAR is preferable to a simple degree classification. Grade Point Average marking (GPA) also has greater international recognition.

13. Do you agree that the proposed classification description should be incorporated into national quality assurance and regulatory frameworks, as is appropriate for different national contexts? In England, this would mean the use of the proposed classification description as 'sector-recognised standards' as defined in section 13(3) of HERA.

Yes. This is an appropriate inclusion for a national statement of intent. This addresses the contentious assertion that a degree from Oxbridge at a certain classification is 'worth more' – over and above the augmentation of the students' social capital – than a degree from less prestigious institutions with the same classification.

14. How should the proposed classification description be incorporated into:

a. institutional practice

b. other relevant documents or frameworks?

Incorporation of classification descriptions into institutional practice should be handled at institutional level. Acknowledgement of / alignment with professional standards should be sought, where appropriate.

15. What are the:

a. benefits

b. challenges, and/or

c. national considerations

of using a shared sector metric to inform institutional self-assessment of degree classifications over time?

The risk inherent in a shared metric is that it might start from an assumption that a degree from one institution is better than a degree from another. As is particularly evident in engineering, graduates from different institutions may emerge with similarly classified degrees, representing an overall level of achievement, but with diverse areas of strength. Some, for example, may have developed applied skills while others skills may be more theoretical. At the point of attempting to agree or calibrate any shared metric, it would be important – and challenging – to avoid starting from an assumption that any one approach is better than any other in a situation where what is required is a diversity of approaches.

16. How should a sector metric for degree classifications over time be defined?

If this is seriously proposed, the metric would need to isolate grade inflation from grade improvement, and this data is not available (a HESA data *proxy* may be available but this does not mean it is the right data to use in this instance).

We understand this has already been unsuccessfully attempted in the TEF and lessons could be learned from this exercise.

17. How can sector reference points be better used, with more consistency, by external examiners to support institutions to protect the value of qualifications over time?

No specific comments.

18. Should the sector explore the steps that could be taken to remove, or reduce the impact of, the inclusion of upper degrees (1st and 2.1 awards) in algorithms used to rank university performance?

a. Yes

b. No

Please explain your response.

Absolutely.

There are significant pressures that incentivise grade inflation and relatively weak methods to constrain it.

There should be more active collaboration across the sector to decry league tables supported by a UUK-led agreement by universities not to use them in marketing nor engage directly with supporting their compilation. Rankings are extremely damaging to the integrity of HE and are assisted by the heuristic nature of the UK system of degree classification.

As already indicated, we would strongly support a multi-dimensional approach which would allow for recording what has been achieved by each student with greater granularity (such as HEAR). This approach would undermine efforts by league tables to incentivise grade inflation.

19. What should be the parameters and remit for a UK-wide task and finish group on the long-term sustainability of the UK's degree classification systems?

To explore (and pursue) alternatives to the current UK degree classification system.

To present a counter hypothesis of improvement in teaching (and the development of pedagogy in UK universities) and to collate and share national evidence of this.

20. Which of the following options for reforming or enhancing the degree classification system should be considered in more detail? (Please indicate Yes/No)

Reform option Yes/No

Introduction of new upper award - for example, a starred first Yes/No

Introduction of a 'cohort ranking' - for example, providing additional information on graduates' position in the grade distribution. Yes/No

Resetting the classification boundaries - for example, moving up by 10 marks so 80 = 1st and so on Yes/No

More regular review of Subject Benchmark Statements to keep pace with improvements in teaching and learning Yes/No

Universal HEAR format Yes/No

Other (please explain) Yes/No

No reform required Yes/No

We support reform of the degree classification system and would welcome further work to explore other approaches and ideas which are more fit for purpose than the current arrangement. We would very much welcome more research in this space.

The engineering community would strongly support a multi-dimensional approach, such as a universal HEAR, which would allow for recording what has been achieved by each student with greater granularity. This approach would undermine efforts by league tables to incentivise grade inflation and force institutions and employers to take a more holistic view of the real suitability of individual graduates rather than using degree classifications as a heuristic proxy of achievement.

We do not support the suggestions for enhancement of the degree classification system or resetting the classification boundaries. These suggestions, if norm-referenced rather than criterion-based, would simply facilitate grade inflation over time and would disadvantage a cohort of students who

genuinely achieved more highly than their previous peers. In addition, the introduction of cohort rankings would encourage the heuristic approaches already discussed, would undermine measurement of pedagogic improvements over time and would again disadvantage the most deserving cohorts.

Note that for engineering the subject benchmark statement is based upon Engineering Council standards which are set at a threshold (pass) and subject to periodic review and it would be helpful to retain this relationship and associated flexibility in terms of timings of reviewing the Subject Benchmark Statements.

21. Do you have any other comments on the proposals that have not been specifically asked in this consultation?

We suggest that any proposals ought to be aware about creating incentives around fee levels and any unintended consequences that may arise from the introduction of differential fees.

Engineering degree accreditation is on the basis of achieving a pass and takes no account of the degree classification.

Rules governing classification of degrees often allow modules with low marks to be excluded from the classification calculation. Therefore, it is possible to be condoned or compensated in a module and therefore not have achieved all the learning outcomes specified for a degree but still be awarded a degree with first class honours. It would be better/fairer if terminology and rules associated with compensation and condonement were consistent across HEIs.