Engineering Professors COUNCIL
The voice of engineering academics

Compensation and Condonement

Engineering Professors' Council Response to proposed accreditation regulations

Executive Summary

The Engineering Council's incoming changes to compensation and condonement rules have been subject to sustained criticism from some pockets of the EPC community. This paper presents the reasons for this and provides member examples to help the Engineering Council understand why the (unintended) consequences are problematic in some Engineering departments. Key concerns include the impacts on students and particular groups of students; the extended use of parallel unaccredited exit routes with lower thresholds; the constricting effect of the rules on university processes and innovation and, ultimately, the weakening of the accreditation route and engineering pipeline. The work has also highlighted that some members are not fully aware of why the changes themselves have been implemented and on the basis of what evidence and if their feedback on the impacts has been fully appraised.

Background

In May 2020, the Engineering Council updated its policy on compensation and condonement, which resulted in new rules being put in place for new cohorts on accredited programmes starting from September 2022. The EPC published a guest blog by the Engineering Council's Education and Skills Manager to explain the changes and also offered feedback to the Engineering Council following an initial flurry of member concerns. The Engineering Council's response is available on the EPC website.

Some EPC members have continued to express concerns that these accreditation changes present significant challenges for their engineering departments, giving examples of where their (planned) implementation has prompted shifts in approach that may be neither intended consequences of the changes nor desirable.

To understand if this is a widespread problem, in March 2021, the EPC asked each member university's representative to comment on the new rules. Where challenges were identified, we asked for specific examples of these so we could present any evidence to the Engineering Council. Meanwhile, the Engineering Council are conducting a review of their new policy and associated guidance and expect to make recommendations following a meeting on 2nd July. (Note this does not mean that anything is necessarily going change). The following summary is presented to the Engineering Council in advance of that meeting.

Findings

We received 18 responses from engineering departments offering accredited degrees in England and Scotland. This response rate is typical for an EPC consultation of this nature. Just over half of the responses were from Russell Group universities. The remaining responses were from University Alliance, non-aligned universities (or those who preferred not to say). As such, the views herein are from a self-selected and not necessarily representative sample of our members.

Eleven of our respondents, the majority of both Russell Group and non-Russell Group providers in the survey cohort, reported that the accreditation (compensation and condonement) changes presented specific concerns or challenges to their institution. Six confirmed that they did not.

Key concerns were that the changes to the policy:

1. offer no obvious benefit to students and employers;
2. will have an unknown and likely negative impact on students;
3. may present greater disadvantage for some groups of students;
4. could impact on future Engineering HE recruitment;
5. are too inflexible to respond to the diversity of accredited engineering courses;
6. have failed to respond to the known sector concerns about 30-credit rule;
7. have a dampening effect on innovative programme design;
8. have led to undesirable changes in the structure and design of courses including the creation of new "fall-back" courses;
9. have led to undesirable changes in module, credit weighting or grading strategies;
10. demand modifications to university regulations and exam board practices;
11. increase the administrative burden of providers.

Each of these are elaborated further, with examples, below.

1. The new policy offers no clear benefits to students and employers

While there was support for the robust certification of competence, some members felt they had a lack of awareness of the reasons for – and evidence of – a need for the changes. There was disappointment that the Engineering Council and other accrediting bodies didn't seek evidence to support the policy from HEIs who set the award and progression criteria. A dozen of our members are happy to engage further with the EPC in this area.

Some felt that employers in some disciplines (Electronic Engineering as an example) did not need or expect additional quality assurance. It was felt that students would increasingly reconsider the value of accredited courses in some contexts.

Members were respectful of the importance of improving teaching and assessment to reduce the need for compensation, and mindful of the potential "quality" reasons for a student failing an assessment (poorly defined entry requirements for the course, the teaching not fit for purpose, assessments not fit for purpose, the circumstances of the student not appropriately responded to, etc.). This is universities core business. Some members welcomed the internal review of learning outcomes triggered by the change.

In practice, though, other ways had often been developed to offer this assurance and the exceptions tended to relate to not to teaching and learning quality but to student barriers, to which the policy was not felt to be supportive. There were fears that the effect of the policy could ultimately be "dumbing down".

2. Changes to the rules will have an unknown and likely negative impact on students

The small amount of material that students would be allowed to pass by compensation in order to retain accreditation will almost certainly result in many more students being awarded non-accredited degrees. This will include capable students who, after 4 years of work and attainment, has an "off-day" during a final exam on a core module.

In some cases, changes in award (accreditation and title) prevent graduates from securing job placements. E.g. BEng Electronic Engineering with Computing becomes BEng Electronics, which is less attractive to software engineering. We foresee that those students will feel let down and less motivated to go on to become a professional engineer.

While providers will do their best to make the structure and nature of their programmes clear to incoming students (particularly in light of Competition and Markets Authority rules), accredited programmes will likely have a lower progression rate than non-accredited programmes. The new OfS supermetrics may encourage the "gaming" of programme titles to improve progression at the course code level.

3. Changes to the policy may present greater disadvantage for some groups of students

There appears to be an inherent assumption that the weaker students will exit the accredited degree programme as weaker students who are trying to achieve their degree are particularly affected by the existing Engineering Council requirements (at best taking resits to proceed to the next academic year). However, this could lead to the perverse outcome that a good engineer could be denied an accredited degree due to failure in one module, despite having achieved programme learning outcomes through other modules.

We are particularly concerned about students who come from disadvantaged backgrounds. Some of our members have many students who have had challenging pre-University experiences and/or come from backgrounds where the level of support is limited or who may have lower qualifications on entry. Students from many backgrounds take time to adjust to study at university level.

We have been provided with feedback specifically on overseas students who take time to adjust to study in the UK; one member empirically reports an increased number of overseas students asking to leave with an unaccredited degree, to avoid the PEI requirements.

Members also report a number of students who arrive with undiagnosed additional needs, such as dyslexia. While many of these students are able and motivated, many face challenges, especially in their first year when they are adjusting to a new environment and filling gaps in their knowledge and skills.

The new rules could also mean a bright student with protected characteristics either failing to progress or being forced to defer to a non-accredited route because of a small number of 'failing' credits at Level 4.

In each of these scenarios, there will be students who have struggled to adjust to university life who are forced to transfer to a non-accredited degree because of, say, 45 credits of compensation (in a year that does not count towards the award mark) but who go on to successfully complete a placement and achieve a first-class MEng degree. This was felt by some to be an unfair reflection on their hard work and talent, demoralising, and contrary to the sector's need to diversify its talent pool.

Additionally, some universities offer a general Engineering degree, with specialisation in the 3rd and 4th year (MEng). We are advised that those students who are natural specialists often struggle in the first two years but go on to excel in the later years. There are concerns that the no-condonement policy will disadvantage them unless providers revisit the learning outcomes in the latter parts of the course.

Finally, and fundamentally in relation to student disadvantage, the changes places additional demands on Engineering students above those of other subjects leading Engineering students to be treated differently to students on other courses.

4. **The unintended consequences of the new compensation and condonement rules could damage future HE engineering recruitment**

   A combination of providers' inability to commit to an accredited outcome at the outset for the Engineering student who meets the university standards (meaning that students do not get the degree they signed up for); the additional demands on engineering students above those of other subjects; and a likely decrease in accredited graduates may eventually impact on Engineering HE recruitment (and possibly the value of accreditation itself) as "word gets around". Even fewer students choosing engineering was felt to be a real risk.

5. **Changes to the policy are too inflexible to respond to the diversity of accredited engineering courses**

   Although all work within their own university general regulations, engineering courses – and departments and universities within which they sit – are not homogenous. Some relevant ways in which our survey confirms diversity is in their existing approaches to unaccredited "fall-back" awards for students who meet university degree requirements but not the PEI's; their systems (or not) of condonement; exam board policies (e.g. discretion to allow a student to progress carrying failed modules if the overall performance is sufficient, some only when subject to programme regulations which may require certain modules to be passed); (final year) resit policies; and exemptions and adjustments for any of these.

6. **The Engineering Council has failed to respond to the known sector concerns about 30-credit rule**

   Some members considered the 30 credit Bachelors compensation rule arbitrary and wanted more information on the justification and evidence that it would lead to the desired outcome (i.e. ensuring graduates' quality) and not institutional gaming. It was felt by some that the Engineering Council has not effectively engaged with University concerns around the 30 credit rule.

   Not all universities operate in 30 credit bundles. For those who operate only 20 or 40 credit (project) modules on undergraduate courses, the maximum 30 credits of allowable compensation at undergraduate level cannot be fully utilised. Some universities have moved to fix to 30 credits (or 15 credits) amidst concerns that restricts flexibility to the detriment of students and HEIs, possibly resulting in a less diverse range of graduates entering the workforce.

7. **The resulting inflexibility has a dampening effect on innovative programme design**

   Many universities are keen to innovate, particularly to take advantage of the latest pedagogic thinking around creativity in the Engineering curriculum – as proposed by the EPC, the Royal Academy of Engineering and the Engineering Council itself – and to take advantage of the digital innovation that has developed during the sector's response to the pandemic. Having a 'one size fits all' rule that is pedagogically unnecessary was felt to be contrary to this and a potential source on inequity.

   Having the flexibility to adjust credit weighting, in itself, can be a useful tool, where appropriate and in context. However, the 30-credit Bachelors compensation rule is perceived to have a dampening effect on innovative programme design; Departments feel pressured to think in a reductionist way defined an arbitrary credit number, rather than think more creatively to create programmes suited to their subjects and the profiles of the students who are recruited.

8. **Changes to the policy have led to undesirable changes in the structure and design of courses including the creation of new "fall-back" courses**

   Half of respondents (both Russell Group and other) considered adaptations they had or would need to make undesirable outside of the context of the changed Engineering Council compensation and condonement rules.

   Changes in the structure and design of programmes to accommodate the new rules were commonly cited included not only adjustment of compensation schemes, but redesign of assessment blocks and unscheduled systematic programme specification reviews. Changes to the title of the award, and the introduction of new courses were also cited. The need for equitable access to resits was noted.

   The majority of respondents deemed it necessary but not otherwise desirable to either make wider use of existing parallel non-accredited degrees as an exit route or put in place a new series of parallel set of non-accredited exit awards with lower thresholds as an exit route to enable students to graduate where they meet the institution's requirements for the award but where the accreditation requirements have not been met. The avoidance of this practice is important for some members.

9. **Changes to the policy have led to undesirable changes in module, credit weighting or grading strategies**

   In many programmes, students achieve programme learning outcomes multiple times in several different modules and others are moving to doubling-up on providing the same learning outcomes to enable students to meet them at varying points across the degree as good pedagogical practice. However, the current rules don't take account of the fact that a student may have achieved the programme Learning Outcome in multiple other assessments. This could lead to the perverse outcome that a good student on a challenging programme could be denied an accredited degree due to failure in one module, despite having achieved programme learning outcomes through other modules.

   As a result of this, some members report making changes to their module strategy to ensure learning outcomes required for accreditation fall in a smaller number of modules. This is counter intuitive. Designating some modules as core is a commonly reported adjustment also being made.

To minimise the likelihood of a student who has achieved the programme learning outcomes (and passed their degree - possibly at a high level) not being awarded an accredited degree, some members are reviewing their programme assessment strategy.

We have been provided with details of an approach to separate "threshold" and "grading" style assessments for some modules, where threshold tests are designed at a basic level to test the basic understanding and demonstrate achievement of the learning outcomes. But the grading assessments are set at a much tougher level and intended to differentiate levels of performance. Again, this could result in the perverse effect that weaker students who gain bare passes on all courses will secure an accredited degree, versus more capable students who excel in a subset of courses, but perhaps experience difficulties on one or two courses.

In order for failed modules to be passed, "Resits for Professional Purposes" regulations that sit on top of the University's regulations for Engineering Degrees, exist in some providers.

We have also been provided with an example of an internal member debate on whether the available 20 credits of compensation should be awarded as soon as required, or whether to give students the option of delaying the application of compensation to later years if the degree. The provider has decided to apply compensation at the first opportunity, but if a student wishes to take a resit exam instead, they can appeal to the board of examiners to be allowed to do so. In this case, compensation will be rescinded, and the resit will allow the student to gain the credits.

Programme redesign to change the credit weighting of modules or fit a fixed module credit value has also been cited (in part owing to the 30-credit problem already discussed above).

10. **Changes to the policy demand modifications to University General Regulations and exam board practices**

    In many cases, compensation rules are at odds with those of the university. Engineering courses which require variance from standard University Assessment Regulations are difficult to both set up and maintain. Deviating from university regulations is a hurdle. At worst, it may trigger governance changes to university regulations for progression and award which are no small feat and at best a very substantial amount of additional academic workload to differ practice. Where conflicts cannot be resolved and occur outside of the student record and other systems, manual intervention for awards is often the only option. Either approach directly impacts core business (the student).

11. **The changes increase the administrative burden and associated overheads of providers.**

    While some universities were able to accept and implement regulations for engineering to meet PSRB requirements with minimal work, the general feedback was that variance from existing university regulations creates an extensive administration burden. Because of the accreditation timescales, is some cases. changes need to be made across multiple subjects and programmes at about the same time, which puts a significant load on both the academics and professional staff. This is also happening during a pandemic when those staff are already working well beyond normal expectations.

Reflection

The heart of member dissent, where is occurs, is in the balance of the need for greater assurance that graduates have met all the programme learning outcomes specified in the Engineering Council's AHEP (Accreditation of Higher Education Programmes) specification versus the need to support

engineering students to succeed in the way that is most suitable in their context. Similarly, the approach to transparency and consistency versus innovation and some degree of flexibility on failed modules is a source of frustration. There is not agreement that the changes add, not detract, from the accreditation offer.

Our members would benefit from a) a better strategic understanding of why the regulations were updated (such as in response to an identified employer, student, university, quality assurance, or other regulatory change outside of the UK) and b) on what evidence base the new parameters were set. Universities would appreciate some reassurance that the breadth of engineering academic expertise and input – recognising that there are differences between academic institutions – had formed part of the evidence base upon which the decision was taken.

Members would also appreciate sight of or input to Engineering Council's policy impact assessments in this regard.

Finally, specific operational guidance on how Academic Qualifications Panels within PEIs will respond to students who have passed all but one module and want to apply for professional qualification, was sought.

June 2021