



HEFCE Quality Assessment Consultation

(Submitted online 27th February, 2015)

Question 1: *Have we identified the trends that you expect to see over the next decade? Have we missed any likely changes that you feel should be included in a discussion about the most appropriate arrangements for quality assessment by 2025?*

In addition to the trends identified, we would emphasise that:

- Mixed modes of programme delivery will become more prevalent as a) students seek more flexible methods of learning and perhaps have to work as well as study and b) employers increasingly seek more flexible ways to re and up-skill their workforces.
- Related to the above, we are also likely to see an increased number of non HE-based assessors as students and their employers seek to achieve academic credit as a result of work-based or other types of learning and work experience. This clearly has challenges relating to consistency and quality of assessment.
- Students and their employers may also demand greater alignment of the link between learning outcomes from their degree programmes and the standards of competence set out by related professions. (See example of engineering's professional institutions working in collaboration with universities to align requirements such that no stakeholder is disadvantaged).

Question 2: *What types of quality assessment arrangements would be necessary to:*

- *ensure that barriers to institutions implementing their mission or strategic direction of travel over the medium term are minimised?*
- *ensure that providers are able to be as swift, agile and imaginative in developing new provision as is necessary?*
- *retain any valuable enablers present in the current system?*
- *facilitate new (types of) partnership arrangements and other innovative forms of provision?*

Quality assessment:

- needs to be independent and rigorous. Any future system should include subject scrutiny on areas of concern indicated by a range of independent third party sources of feedback (for example, student surveys etc although improvements may be necessary to make the current data set e.g. NSS and DLHE would need changes to be made more "fit for purpose". DLHE in particular does not take account of the fact that graduates in certain disciplines may take longer/choose to take longer than 6 months to find suitable employment;
- needs not to be enmeshed in bureaucracy. Data collection and preparation should be kept to a minimum, re-using existing information as far as possible;
- needs to be flexible enough to recognise diversity in provision and innovative practice;
- needs to be co-ordinated with practice overseas to facilitate recognition.

Question 3: *What competitive or reputational advantages do you think the current quality assessment system gives UK HE providers in the international arena which you would want to see retained? Are there disadvantages which you would like to see addressed? How do you think the situation may change over the next ten years? How important is the European quality framework to you?*

The current system of HE quality assurance is widely held to be an exemplar, particularly in Europe, for the PhD and those features should be retained. In particular, it is believed that value is placed on:

- the practice of using external examiners – although see also 9 below and the recommendations of the Finch Review (2011);
- the UK's system of separation of subject and institutional review, both being independent of Government.

For engineering in particular:

A significant numbers of engineering students come from overseas so opportunities to benchmark from other jurisdictions and ensure transferability as far as possible should also be sought actively. For Europe:

- the European Network for Accreditation of Engineering Education has commented favourably on the UK Quality Assurance Agency for achieving full compliance with Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) in the recent review by European Agency for Quality Assurance in Higher Education (ENQA). This helps re-inforce the UK's 'world-class' reputation and helps underline the alignment of degree outcomes with professional institutions' accreditation requirements.
- The European Qualifications Framework is also used as a key point of reference for the EUR-ACE Framework which is a benchmark for accreditation of engineering and technology provision in Europe.

Question 4: *Are these the right principles to underpin quality assessment approaches for the next decade? Are any of these principles no longer useful? Are any principles that would be necessary for effective quality assessment in 2025 missing from this list? Are some principles more important than others? How should we manage the tensions between some of these principles?*

Ensuring that the UK maintains its global leadership and respect in the quality of its higher education provision should be an over-riding principle. Currently, overseas students researching where to study are often pointed to newspaper league tables as guidance as to the "best" programmes of study. If quality assessment is to be independent and evidence-based and provide appropriate information to help students take decisions, care must be exercised in use of university league table data in the assessment process. The majority of the component metrics for which do not provide relevant information such as whether programmes deliver the required outcomes for accreditation or whether they are being delivered with the required resourcing and infrastructure etc.

Avoidance of duplication of activity and delivery of cost effectiveness are also important principles which have been adopted by the engineering community. For example, the Quality Assurance Agency (QAA) has adopted the learning outcomes set out by the engineering profession for degree accreditation, while the profession (through the Engineering Council) uses QAA's institutional review reports. The QAA's Master's Benchmark statement is an essential component of the Engineering Council's accreditation process, and has recently been incorporated into the Engineering Council's Accreditation of Higher Education Programmes guide (AHEP).

Further, the current method is essentially resourced *by* university and the professions *for* university stakeholders and the professions and as such, costs are kept down – either simply charging direct costs or offering time on a goodwill basis. A different approach might introduce an unsustainable and unacceptable cost burden on the sector. That said, a system which is reliant on volunteers needs to be confident that the volunteers are appropriately selected, experienced etc. (Finch Review) and if this is to be implemented to improve the current situation, there will be an attendant additional cost.

Lastly, the system must be flexible and able to cope with the diversity of provision in the sector, thus, being absolutely clear about what we mean by "quality" and putting the emphasis on measuring outcomes should be key.

Question 5: *What are the characteristics of a quality assessment system that would incentivise, support and recognise outstanding learning and teaching? Should the scrutiny of institutional quality improvement activities be a component of a quality assessment system?*

As is the practice in other sectors, scrutiny of quality improvement policies and activities should be a component of a quality assessment system, as should the policies in place for staff recruitment, appraisal, continuing professional development (which might include membership of professional bodies, where appropriate as well as academic development) and selection for promotion. These policies should reflect the importance of good teaching. Metrics on the proportion of staff on research only versus teaching contracts may also be considered as there is a fundamental and ongoing tension between the two in increasingly resource-constrained environments. In this way, conclusions may be drawn by assessors on institutional culture of recognition for good teaching and there would be a clear incentive (via the externally publicised result of the assessment) to ensure that policies and processes were actually implemented.

Question 6: *What do stakeholders want from a set of quality assessment arrangements?*

a. *What confidence should students expect to take from future quality assessment arrangements?*

Students should be able to rely on the quality and fairness of the teaching and assessment they will receive, within a learning environment which has appropriately accessible and up to date resources and infrastructure. If in addition, as in the case of engineering, the programme is intended to be a first step to gaining a professional qualification, then their learning outcomes will meet the standards set by the appropriate professional body.

b. *What confidence will employers seek from future quality assessment arrangements?*

There is a tension between what employers will seek and what they should realistically expect and there needs to be extensive communication to manage expectations.

- That graduates have intellectual capabilities at the appropriate level for the qualification they have achieved
- graduates in the same discipline with the same class of degree from different universities meet a threshold level of knowledge
- qualifications meet professional bodies' standards where relevant

c. *What assurance should Government and the taxpayer take from future quality assessment arrangements?*

Government and tax payers will want to be assured that:

- the UK maintains its global competitive leadership in the quality of its higher education;
- all who can benefit can access higher education, fairly
- HE providers are delivering value for money by ensuring that it is maximising the future value creating potential of its graduates (thus meeting the needs of employers).

d. *What value should quality assessment arrangements bring to higher education providers?*

They should:

- support the process of continuous improvement and reflective practice
- provide an externally acknowledged assessment
- encourage and support innovation

Question 7: *Should we seek to demonstrate to stakeholders that academic standards are comparable between providers? And between subject areas? If so, what assurances should be sought about such comparability's?*

It will be difficult to demonstrate absolute comparisons between providers. There is a threshold level for obtaining a particular class of degree but there will always be a spread of capability, knowledge etc, even within institutions.

However, we understand the desirability of doing so...for example because:

- students (and indeed their employers) do not always have the option to relocate and need confidence that they can access quality teaching and resources, resulting in a recognised qualification, from any provider including that which is most local to them;
- the perceptions of different universities influence (often inappropriately) some employers' views about graduates' academic capabilities. The practice of recruiting graduates from a particular university or universities can needlessly disadvantage some individuals as well as limit the talent pool from which these employers recruit.

How the threshold quality of provision and level of academic/professional capability that can be expected from a graduate of a programme in a particular discipline could be further explored and there are some possibilities given, as is

the case for engineering, the extensive work that has gone into aligning the accreditation requirements of the professional institutions with sector and institutional quality assurance practice.

Question 8: *What assurances should we seek about the maintenance of academic standards over time? Are there new ways or models of providing such assurance that should be considered? Are current approaches to the assurance of academic standards adequately able to recognise student learning in a range of contexts, for example during placements, or professional practice?*

Future approaches will need to take account of the future trends identified in 1. above. For engineering, the professional institutions have (and continue to) develop diverse models, as well as placing emphasis on periodic review. These should be maintained, and learned from, rather than introducing entirely new models.

We do need to bear in mind, though, that programme accreditation is very dependent on the opinions and experience of volunteers. While this has many advantages, there is a need for the system to require appropriate and ongoing training in the principles of assessment to ensure fairness and consistency (See recommendations of Finch Review).

Question 9: How far should reliance be placed on the external examining system to provide judgements about standards? Is there still a role for it or not? Should it be strengthened? Should there be more of an international dimension to external examining arrangements? How far should reliance be placed on Professional, Statutory and Regulatory Bodies to provide judgements about standards? Are there new ways or models of benchmarking degree standards that we should look at?

Retention of this globally respected attribute of the UK system is essential – and, in fact, should be strengthened (we support the recommendations of the Finch Review of external examiners to ensure greater comparability and consistency). We might also include additional external examiners per subject – with perhaps a requirement for an examiner from an overseas institution.

For engineering:

- external examiners' reports are referred to during the programme accreditation process and provide an important source of assurance to accreditors. (That said, we support the recommendations of the Finch Review of external examiners to ensure greater comparability and consistency);
- given the extensive work carried out over very many years to align the requirements and standards of both HE and professional engineering institutions, we believe that a high level of reliance can be placed on the profession's judgment about programme standards. Accrediting panels are required to consist of both academics and employers who are subject experts, which could not be provided by the central institutional review process.

Again, these models should be learned from and developed rather than introducing new models.

Question 10: *How far is it possible to place further reliance on an institution's own internal governance mechanisms and approaches to provide the assurances necessary for a quality assessment system?*

It is very important that significant reliance is placed on internal governance mechanisms and that they are therefore appropriately scrutinised.

Question 11: *Can one concept of 'quality' still hold good? One external quality assessment system? For all providers? At all stages of their development?*

Having one concept of quality is attractive, but clarity on precisely what it is that is being assessed - and being able to communicate this to stakeholder users of the information is key. This definition is a fundamental debate to be had and forms the context within which the rest of these questions can be considered.

Question 12: *We currently have criteria – expressed in the Quality Code and tested through review conducted on behalf of the funding bodies by the Quality Assurance Agency for Higher Education – for those seeking entry to the higher education sector (if their Home/EU students are to be eligible for fee loans).*

In your view is that 'threshold' bar currently set too high, too low, or is it about right? Do you prefer a low initial threshold with more scrutiny thereafter, or a higher threshold with less scrutiny thereafter? Should the threshold test include outcome measures as well as process measures; just process measures; or just outcome measures?

The threshold bar should be no lower than currently.

Quality should be assessed primarily on outcomes, not inputs. However, process and internal policy reviews are also important to ensure that there is a robust governance structure in place which can deal effectively with emerging problems in either environment or delivery.

Question 13: *Is there a case for cyclical review, against identical criteria, of all providers in the sector, regardless of their track record and performance or not? If so, what should its purpose be? If so, should this process be one conducted by the institution itself? Or should it be internal with an external verification that it has been done well? Or should it be external and completely independent of the provider?*

One of the key principles for a quality assessment system outlined in 6 above is to provide support for continuous improvement and reflective practice and some form of objective external assessment: this should be conducted within a framework of cyclical review as previous track record or reputation cannot guarantee future good practice.

For engineering, programme accreditation is awarded for a maximum of five years but there is the flexibility to accredit for shorter periods or for the professional accrediting body to request interim visits where a programme is new or areas that require attention are identified.

Question 14: *What should the purposes of the Quality Code and Subject Benchmark Statements be, if any, ten years from now? Are these the right external reference points around which providers should continue to design and review their academic provision in the forthcoming decade?*

Given the need for continuous innovation in programme design and delivery, it is necessary to maintain a framework and provide benchmarks for those involved in developing and delivering programmes to ensure that the required core knowledge within a broad subject area is delivered. Periodic review of the codes and benchmarks will of course be necessary, referencing external stakeholders to ensure that knowledge and standards are current and keep up with the evolution of the discipline and professional practice. A demonstrable culture of reflective practice would facilitate this.

Question 15: *What evidence and/or data should be used to identify quality issues in an individual provider?*

See 9 above, plus trends in progression and achievement data. Potentially also include contextual data and policy information (e.g. on staff and student diversity as for Athena Swan).

What assurance should providers give about their policies and approaches to handling these issues and the lessons learned/improvements made? Should quality assessment arrangements involve a mechanism to intervene where evidence suggests there are persistent, serious, or systemic problems in the quality of education or the standards provided?

What should the range of consequences or sanctions be in cases where any issues or problems are confirmed by an investigation?

The first principle should be for any sanctions to avoid disadvantaging students. Given that the system should be one of developmental continuous improvement, identified issues should have been solved before this stage is reached.

Question 16: *Should there be a mechanism to pick up any sector-wide issues of quality or standards which could be improved? If so, how should this best be done? Conversely, should there be a formal, sector-wide mechanism for disseminating good practice in learning and teaching, and enabling its uptake? If so, how should this best be done?*

Periodic reporting of sector-wide issues would be a helpful element of a framework for continuous improvement for institutions.

The HEA Subject Centres were formerly the way in which good practice could be disseminated.

Question 17: *The current premise is that a provider is a single corporate actor in which quality and standards assurance arrangements – such as academic regulations, or monitoring and review processes – have to be applied identically and*

consistently to all degree programmes at the same level, wherever delivered. Does this continue to make sense in the next decade in the context of an increasing diversity of provision? Is it inhibiting pedagogic developments in different disciplines? Inhibiting collaboration? Or does it make it easier to develop, for example, multi-disciplinary programmes?

There is a current diversity of provision in which use of single threshold standards do not seem to hamper innovation particularly.

Some individual universities' regulations sometimes prevent collaboration but this is for the individual institutions to resolve - if the over-riding objective is important enough, it will drive the necessary change.

Question 18: *Should a revised quality assessment system include scrutiny of activities taking place outside the UK? Should HE providers in the UK be given a choice of accreditation processes and accreditation agencies including some emanating from, for example, North America or Australia? Should we recognise them officially in some way? What recognition should we give to quality assessment or assurance systems in other jurisdictions where UK providers are actively delivering higher education courses?*

If the UK is to maintain its global competitive advantage and maintain its reputation for high quality standards, UK HE providers should not be given the choice of accreditation processes and agencies if this allows them to offer programmes that are not subject to UK systems for accreditation.

To facilitate international mobility, not least in the portability of professional qualifications, it is important that programmes leading to a UK award/title (Bachelor's, Master's, etc) meet the definitions contained in the UK qualifications frameworks.

Question 19: *Does the current quality assessment system represent good value for money in your view? Which elements, if any, of the current arrangements represent value for money? Which, if any, do not?*

No comment.

Question 20: *Are the questions posed in this discussion document the right ones for the context set out above? Are there other deep questions that are missing from this discussion document?*

We would re-emphasise, having one concept of quality is attractive, but clarity on precisely what it is that is being assessed - and being able to communicate this to stakeholder users of the information is key. This definition is a fundamental debate to be had and forms the context within which the rest of these questions can be considered.