

HEFCE Future approaches to quality assessment in England, Wales, and N Ireland

Annex A: List of consultation questions and related information

Please respond to this consultation by **noon on Friday 18 September 2015** using the online form at www.surveymonkey.com/r/qaconsult. Those responding in relation to the proposals as they would apply in Wales should do so by **noon on Monday 31 August 2015** using the same form.

Freedom of Information Act

Information provided in response to this consultation may be made public, under the terms of the Freedom of Information Act or of an appropriate licence, or through another arrangement.

Such information includes text, data and datasets. The Freedom of Information Act gives a public right of access to any information held by a public authority defined within that legislation. It applies to information provided by individuals and organisations, for example universities and colleges. We can refuse to make such information available only in exceptional circumstances. This means that data and information are unlikely to be treated as confidential except in very particular circumstances.

List of consultation questions

Question 1: Do you agree with our proposed principles to underpin the future approach to quality assessment in established providers?

Question 1: While we see the principles as broadly reasonable, we would make the following suggestions and observations:

- In taking a “data driven” approach to continuous improvement in teaching and learning, care must be exercised in using existing metrics such as National Student Survey, degree classification etc. The behavioural reality resulting from use of these metrics as a result of their role in the production of league tables cannot be underestimated and may have the opposite effect to that intended.
- The system in Scotland is very much focussed on enhancement which provide a means for institutions, academic staff, support staff and students to work together in enhancing the learning experience. We think there is something to be learned from this.
- It is unclear whether responsibility for the wider assurance system will remain with the Quality Assurance Agency (QAA). The Engineering Professors’ Council and engineering’s professional bodies have worked closely with the QAA for many years and shared information and experience freely to ensure alignment of learning outcomes and mutual understanding. We would not wish to lose this extensive institutional knowledge and relationship.

Question 2: Do you agree that our current proposals for the use of meaningful external scrutiny as set out in paragraphs 32-34 are sufficient? If you do not agree, please indicate what additional or different external scrutiny you propose and provide the reasons for this.

In engineering, we have worked extensively with our PSRBs to ensure that the processes of accreditation and quality assessment complement each other and avoid duplication and unnecessary bureaucracy. For example, the inclusion of a student reviewer in the QAA's process and the review of institutional governance and facilities has meant that these need not be a focus of engineering accreditation visits. We can therefore see the attraction of the proposals to operationalise "meaningful external scrutiny" via use of the PSRB visits. That said, not all programmes in all subject areas have such a relationship with a PSRB and so the desired consistency of approach would be compromised (use of external peer review, alumni etc, the examples provided as alternatives could be viewed as less objective). Further, simply because a programme is accredited by a PSRB does not mean that degree outcomes are comparable between institutions, rather, they provide threshold standards of achievement/outcome.

We would also caution regarding another unintended consequence. Accreditation is intended to be a developmental process with a supportive relationship between the HEI and PSRB. The current proposals could shift the perception away from this role to one of the PSRBs having to adopt a "policing" role which would mean that HEIs were even less likely to innovate in programme content and delivery.

Question 3: Do you agree that future approaches to quality assessment should be based on an assumption that 'one size' can no longer sensibly fit all?

We offer cautious support for adopting a risk-based approach.

We agree that assessment must not lead to uniformity: there must be sufficient flexibility in the evidence base institutions must produce to demonstrate quality. Students now come from more diverse backgrounds and non-uniform experiences, and with differing aims. If institutions are to meet their expectations and the needs of their future employers, they cannot be constrained by needing to meet an inflexible set of criteria. What may be "quality" in one circumstance may be inappropriate in another.

Understanding the approach taken in our competitor countries would provide the context to understand how this would shift perception of the UK's quality system and its current leadership in this regard.

Question 4: Do you agree that there should be a baseline requirement for the quality of the academic experience for students, and that this should be published and maintained?

Our work over many years with our PSRBs and the Quality Assurance Agency on ensuring that threshold standards in learning outcomes are delivered on accredited programmes means that we would agree with this statement if these baseline requirements are to be articulated and reviewed in a similar form.

Question 5: For England, do you agree with the proposal that an individual provider, once it has passed the gateway for entry into the publicly funded system in England, should not be repeatedly externally retested against the baseline requirements for an acceptable student academic experience, unless material evidence suggests otherwise?

Yes. However, the material evidence should include periodic self-certification with a framework provided on acceptable process and evidence (which should be available for inspection by stakeholders).

Question 6: For Northern Ireland, do you agree that providers should provide annual evidence and assurance that they are meeting the baseline requirements for an acceptable student academic experience?

Yes.

Question 7: Do you agree that the funding bodies' verification of an institution's review methodology provides a reasonable mechanism through which to operate risk-based scrutiny of a provider's arrangements to secure a good and improving student academic experience and student outcomes?

In principle, making greater use of professions' accreditation reports within the institution's wider review process is welcome. However, the method by which this occurs needs to be debated. As outlined earlier, the current relationship between HEIs and PSRBs is a developmental one and accreditation reports on degree programmes are confidential to the PSRB and the HEI. Switching to an open approach would change the nature of the relationship.

We have some concerns about the review process being "*focused on data and information relating to the outcomes of students, rather than the processes operated by the department or institution*". While it should certainly address the outcomes of students, in the interests of enhancement and development, the department must surely demonstrate the process by which it develops and improves provision.

In terms of "*it subsuming other review or accreditation activities and events, for example quinquennial programme reviews and PSRB accreditation reviews*" accreditation visits and internal periodic reviews currently have different objectives and inputs (with only partial overlap) so the sector would need to agree the overall objectives of these reviews and design the process by which they were to be delivered accordingly to avoid the process becoming superficial or cumbersome.

Question 8: Do you agree that student outcomes data should provide the basis for continuous improvement activities within an individual provider?

We would wish to avoid the culture emerging in the schools sector where there appears to be a concentration on enhancing outcome statistics (owing to their linkage with league tables) rather than on educating students. Used in isolation, the true effect of the provision on students will not

be known. Other contextual factors such as students' educational and socio economic background need to be taken into account.

Question 9: Do you agree that we should take forward into detailed design and pilot phases further work on the use of student outcomes data to identify patterns and trends and on the development of approaches for monitoring and supporting institutions as they address areas of concern?

Yes. This is essential. Analysis of the employment after 6 months (current DLHE) data reveals that sometimes apparently low rates of graduate employment need not be a cause for concern in some disciplines as there are good explanations. There will be extensive differences between disciplines and the data and processes need to take this into account. Further, not all data providers/sources operate in the same way and to the same standards – a particular issue where data provided by non UK providers for overseas provision might be used.

Question 10: In Northern Ireland, do you agree with the approach outlined to introduce more effective and consistent arrangements for collecting and analysing feedback from higher education learners?

No comment.

Question 11: Do you agree with the proposal that more emphasis should be placed on the role of a provider's governing body to provide assurances about the quality of the student academic experience and student outcomes in line with the Higher Education Code of Governance? If you agree, please indicate what, if any, additional support they should receive to provide such assurances.

We have some concerns about this. Governing bodies in universities tend to have a very different composition to those in schools and colleges of further education and operate in very different ways (plus schools and colleges tend not to have senates/academic boards) so are not so well-equipped to provide such assurances. The merit of university governing bodies currently is that they can take the longer term view, focusing on trends, trajectories, comparators and the ability of the university to deliver its own strategic objectives rather than focusing on the detail of immediate outcomes. We agree, however, that greater emphasis might need to be placed on ensuring that the governing body have been tasked with understanding (and can demonstrate this) the processes and structures that exist with HEIs around quality assurance and delivering a high quality student experience and that delivery of a high quality student experience (monitored by measures agreed and understood within the institution) has a key place in the university's strategy. As part of the quality assurance framework, HEIs would need to provide evidence that that appropriate induction, training and briefing of the governing body in that regard has taken place.

Question 12: For England, do you agree that, for English institutions, HEFCE should develop and use the existing external accountability mechanisms, particularly the HAR, in the ways described?

Yes.

Question 13: For Northern Ireland, do you agree that DEL should develop and use the existing accountability mechanisms in the ways described?

Yes.

Question 14: Do you agree that there should be a 'probationary period' for new entrants to the publicly funded sector in England?

Yes.

Question 15: Do you agree that international activities should be included in the remit of future quality assessment arrangements as described?

Yes.

Question 16: Do you agree that a future quality assessment system must provide reliable assurances to students and other stakeholders about the maintenance of academic output standards and their reasonable comparability across the UK higher education system?

Yes, in principle - but "academic output standards" needs definition and must be resistant to the downward pressure that is an unintended consequence of the use of output data.

As stated earlier, in engineering, the Engineering Council's output standards for accredited degrees provide assurance about a threshold comparability of standards across different providers within the same engineering disciplines. This cannot, however, be a proxy for assurance of comparability between disciplines either within or across providers. In the accreditation process, the QAA's qualification descriptors are used as a key reference point but stakeholders, especially employers are often unaware of these.

Regarding your statement "*We would support the need for a clear expression of what constitutes higher education at each of its different levels (4-8) and of the amount of learning expected for awards at different levels (be this expressed in credit terms or differently).*" We of course support the need for clear expression of what constitutes the different levels of higher education but expressing this in credit terms implies a focus on inputs rather than outcomes which seems to be inconsistent with many of the themes of the consultation. That said, we acknowledge that while the engineering PSRBs have an outcomes based system there have been challenges from other countries and bodies that rely on credit-based or inputs systems. There are implications for the international standing of integrated master's degrees (not only in engineering), and so careful consideration of the pros and cons will be necessary.

Question 17: Do you agree that the external examining system should be strengthened in the ways proposed, ie through additional training and the establishment of a register?

There are some attractions to the proposals. The external examining system is a strength of the current process in many ways, however some weaknesses are acknowledged such as:

- HEIs are usually required to respond to the report of the external examiner but there is currently no independent check that the recommendations have been responded to
- There is no real consistency of approach with some external examiners focusing on details, such as exam papers, others reviewing the provision more holistically.

A minimum expectation of induction by universities for new external examiners, together with some succession planning and "on the job" training through overlapping new external examiners with experienced ones would be helpful.

That said, training of examiners would be costly and it is not clear who would bear these costs, as would maintaining a register. Having a register implies that there would need to be a procedure for removal from the register too, again with associated costs.

Such 'strengthening developments' may have the unintended consequence of some current examiners to withdraw from such activity and replacements with the necessary expertise and availability may be hard to find.

Question 18: Do you agree that our proposals in relation to the external examining system are sufficient, ie do they go far enough to provide the necessary assurances about academic output standards to students and other stakeholders?

See response to 17 above. Some guidelines to provide consistency and a way of promulgating this would be desirable.

Question 19: Do you agree that it would be helpful to explore approaches to the calibration of academic output standards in different disciplinary and multi-disciplinary contexts?

This is a highly complex area which would require significant research and consultation.

In the engineering context, we should note that accreditation is not a *calibration* of academic output standards - it seeks only to ensure that a set of independent learning outcomes (ILOs) is achieved by all students at a threshold level. Thus it is possible for both the Universities of East Poppleton and West Poppleton to be accredited, while awarding significantly different degree classifications.

Again in the engineering context, it is worth noting that there are already examples of accredited multidisciplinary provision, for example BEng (Hons) Architecture and Environmental Engineering, MEng Civil and Architectural Engineering. It is likely that the incidence of such multidisciplinary provision will increase and so an exploration of the approaches in multi disciplinary contexts would be welcome.

Question 20: Do you agree that providers should use the accreditation activities of at least some PSRBs more centrally in future approaches to quality assessment?

In engineering, accreditation provides some assurance that a degree programme meets the standards set by the engineering profession and involves a range of stakeholders including employers and students and as such, can provide useful input to the quality assessment process.

That said, an HEI might have good reasons not to have sought accreditation. Further, the PSRBs do not concern themselves (nor are they necessarily equipped to deal) with examination and assessment processes or the setting of degree classification boundaries, for example or the other academic activities of the department. Also, as stated in our response to question 2, accreditation is currently positioned as a developmental activity, encouraging curriculum and delivery innovation with robust and frank, “warts and all” reports which are confidential to the HEI. This relationship would be difficult to maintain if part of a more public quality assurance process.

Question 21: Do you agree with the proposal that we should place more emphasis on the role of the governing body of a provider with degree awarding powers to provide assurances about security and reasonable comparability of the academic output standards of students?

See response to question 11 above. While governing bodies need to be content that the HEI has the necessary systems in place and they are operating well, it is difficult to see how they can have the detailed knowledge to provide assurance of the comparability of academic output standards across disciplines and with other institutions. Is it intended that the regulator conduct interviews with members of the governing bodies (as for Ofsted) to satisfy themselves of governors' knowledge of their institution's processes, systems and student outcomes?

Question 22: Do you agree with the proposal to develop guidance to providers on a sensible range of degree classification algorithms at the pass/fail and 2i/2ii borderlines?

We would assume that external examiners are already providing advice on this. That said, we also believe that as the sector moves towards more finely graduated scales, this will become unnecessary.

Question 23: Do you agree with our proposals to develop and implement a strengthened mechanism to investigate rapidly when there is an indication of serious problems within an individual provider which has not been addressed in a satisfactory and timely manner?

In principle, yes.

Question 24: Should the mechanism to investigate problems in an individual provider require, in addition to the investigation of the specific issue of concern, the re-testing of the arrangements in the provider under review against the baseline requirements set out for the gateway for entry to the higher education system?

In principle, yes, but it would depend on the nature and seriousness of the concern.

Question 25: Do you agree with the proposal that providers seeking entry to the publicly funded sector in England and Northern Ireland should be tested, through an external peer review scrutiny process, against a set of baseline requirements for quality?

Yes.

Question 26: Are there any particular areas of our proposals that you feel we should concentrate on as we undertake a more detailed design phase?

We would be interested in information about how these proposals compare with other countries' systems of accreditation.

The issue of kitemarking was touched upon. We would not wish to see a proliferation of so-called quality marks as this can just cause confusion amongst potential students and other stakeholders.

Question 27: Are there proposals not referred to above that you feel we should have in consideration? If so, what are they and what is the rationale for their inclusion?

No comment

Question 28: Are there any particular areas pertinent to the devolved nature of higher education in Wales and Northern Ireland that you feel we should have considered further? If so, what are they and what is the rationale for their inclusion?

No comment