QAA's concerns scheme: guidance for external examiners

Introduction

This guide is for external examiners who have a concern about the academic standards and/or quality of the awards, programmes or modules they are responsible for overseeing.

It should be read in conjunction with Chapter B7: External examining of the UK Quality Code for Higher Education1 (the Quality Code) and Raising concerns about standards and quality in higher education: a guide for applicants.2

Chapter B7: External examining of the Quality Code states:

Where an external examiner has a serious concern relating to systemic failings with the academic standards of a programme or programmes and has exhausted all published applicable internal procedures, including the submission of a confidential report to the head of the institution, he/she may invoke QAA's concerns scheme or inform the relevant professional, statutory or regulatory body.

Thus, QAA welcomes applications to the concerns scheme from external examiners who wish to raise concerns about the standards and quality of higher education and who have exhausted the institution's internal procedures.

Who and what QAA can investigate

Further guidance about which institutions and issues QAA can investigate is provided in the guide for applicants referenced above.

The concerns scheme should only be used in cases where internal mechanisms have been exhausted. Higher education institutions have a range of internal mechanisms to deal with external examiners' concerns.

★ Often external examiners are free to write directly to the chairperson of a board of examiners (or possibly the head of school/department) on any matter of concern to them.

★ Where disagreements arise between a board of examiners and an external examiner, the institution's senate or academic board may have a process for facilitating the resolution of the matter (for instance, through a disputes committee).

★ Finally, external examiners retain the right to write directly to the vice-chancellor or principal on matters of concern that have not been resolved (in fact, external examiners have the right to make a confidential report, in writing, to the head of the institution. See Indicator 17 within Chapter B7: External examining of the Quality Code).

External examiners should refer to the institution's procedures for more information about raising a concern internally.

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1 Chapter B7: External examining, together with more information about the UK Quality Code for Higher Education, can be found at: www.qaa.ac.uk/AssuringStandardsAndQuality/quality-code/Pages/default.aspx.

2 The guide for applicants can be found at: www.qaa.ac.uk/Publications/InformationAndGuidance/Pages/Raising-concerns-about-standards-and-quality-in-higher-education.aspx.
QAA will only investigate concerns which are considered to indicate serious systemic failings in an institution's management of standards or quality. The scheme cannot investigate personal grievances, issues relating to an external examiner's appointment or remuneration, or institutions' decisions to alter or close programmes of study.

There may also be occasions where a concern is properly a matter for the applicable professional, statutory or regulatory body rather than for QAA.

**Scenarios**

The following scenarios are designed to illustrate the kinds of issues QAA would and would not consider investigating. They are given for illustrative purposes and do not represent an undertaking by QAA to investigate a particular concern.

**Example 1**

An external examiner reports that the standards set for a programme are inconsistent with the academic level of the award and below the standards achieved on similar programmes in other UK higher education institutions.

In response, the institution acknowledges the concerns and agrees to take the external examiner's comments into account during the forthcoming periodic review of the programme.

However, the subsequent review does not properly deal with the examiner's concerns and the problem therefore persists. The external examiner writes to the principal of the institution and the principal responds by explaining that the concerns will be taken into account during the next periodic review.

This concern could be suitable for investigation by QAA, in that it suggests a systemic failing in the institution's management of academic standards which the institution is already aware of.

**Example 2**

An external examiner is concerned that an institution's examination board is being more flexible on the condonement of module failure and classification boundaries than institutional regulations permit. Her views on the standards of student achievement confirm these concerns, in that they are not comparable with the standard achieved at other institutions she is familiar with.

This concern has been raised in her annual report for three consecutive years, and she has also written to the vice-chancellor, without response. The external examiner supplies appropriate evidence to substantiate this concern, as well as all communications with the institution to show that internal mechanisms have been exhausted.

This concern could be suitable for investigation by QAA, in that it suggests a systemic failing in the institution's management of academic standards.

**Example 3**

An external examiner alleges that a university has failed to revise its procedures for academic support despite assuring him that, in response to several critical external examiner reports, it would do so by the beginning of the current academic year. He further alleges that the issue of academic support was the subject of a recommendation in the university's last QAA audit report.

The complainant provides evidence of his reports to the university and details of a policy on academic support published three years ago.

This concern could be suitable for investigation by QAA, in that it suggests a systemic failing in the institution's management of the quality of the learning opportunities available to students.
Example 4
An external examiner has been appointed to a UK-based collaborative programme by the collaborative organisation, a further education college. Her contract is with the college, the college operate the examination boards, and she is requested to report annually to the college.

She raises her concerns about the complete lack of contact with the awarding institution, who respond by confirming that her contract is with the college and not the awarding institution, and that they have full confidence in the college to manage the standards of the programme on their behalf.

In addition to her first annual report, she writes to the principal of the awarding institution to reiterate her concerns. She does not receive a response.

This concern could be suitable for investigation by QAA, in that it suggests a systemic failing in the institution's management of academic standards.

Example 5
An external examiner is appointed to a programme taught in the UK and at an overseas institution under a franchise arrangement. He is given the opportunity to review draft assessments, with the assurance that identical assessments are used on both programmes.

However, he is only given the opportunity to visit the home institution. The examination boards consider students on both programmes, but the external examiner is only given the opportunity to moderate marked student work for the UK-based programme.

The external raises this concern with the department (and in his annual report); the department explain that it is too costly to send the external out to the overseas organisation, but that they will try to supply some marked student work for the franchised programme next year.

However, the following year the same problems arise, and so he again reports his concerns in his annual report. He also writes to the vice-chancellor of the institution. Despite assurances from the vice-chancellor that she will investigate this matter, there are no changes the following year.

This concern could be suitable for investigation by QAA, in that it suggests a systemic failing in the institution's management of academic standards.

Example 6
An external examiner considers that the standards set for several modules on an institution's programme in a given academic year are not comparable with those achieved in other UK higher education institutions.

This concern would not be considered suitable for investigation by QAA, in that it does not suggest a systemic failing in the institution's management of academic standards, and the institution has not been given the opportunity to respond.

However, if the concern extended to a period of two or more years, without a suitable response from the institution to the external examiner's concerns, then it may be appropriate to raise the concern with QAA.

Example 7
An external examiner has had their contract withdrawn without warning and feels that the grounds are unlawful or unfair.

This concern would not be considered suitable for investigation by QAA, as it does not relate to the institution's management of academic standards or quality.
Example 8

An external examiner feels that she has been treated discourteously by the chair of the examination board, and her subject expertise questioned.

This concern would not be considered suitable for investigation by QAA, as it does not relate to the institution's management of academic standards or quality.

Contacting us

External examiners who wish to raise a concern with QAA should do so in the normal way by completing an application form. The guide for applicants provides further information.