



Response to the Innovation, Universities, Science and Skills Select Committee report on 'Students and Universities' from the Quality Assurance Agency for Higher Education (QAA)

Introduction

In August 2009 the Innovation, Universities, Science and Skills (IUSS) Select Committee published a report on its enquiries into 'Students and Universities'. This paper sets out the response to the report from the Quality Assurance Agency for Higher Education (QAA).

General comments on the Select Committee's report

QAA welcomes the House of Commons Select Committee's report as an important and thought-provoking contribution to the debate on the future of higher education in England.

There are some things in the report that deserve support. We are pleased both by the Committee's recognition of the need for a strong, independent external body to review higher education and by its clear recommendation that QAA is the right organisation to continue and enhance this work.

QAA believes that the proposed concordat which would define the areas over which institutions have autonomy and those where the Government can reasonably and legitimately exercise direct authority, should be pursued. This would help to reduce the current ambiguity surrounding the nature of institutional autonomy.

Another area worthy of further consideration, despite the potential legal barriers, relates to the proposal to review regularly the way in which degree awarding powers are exercised by all organisations that hold them. At present, with only a few exceptions, these powers, once awarded, are held in perpetuity, without further review. QAA itself has questioned the wisdom of this arrangement with Government on a number of occasions, most recently in 2003. We believe the concept of inalienable degree awarding powers, and the associated automatic and permanent public recognition of institutions that hold them, has become problematic in an international context and might usefully be revisited, albeit in a different way from that proposed by the Committee.

The Committee has made a number of recommendations about the future role of QAA itself. Some have merit and build on our existing work, while others envisage a very different organisation, to match a very different higher education system. We do not believe that the case made for these latter recommendations is persuasive.

Central to the Committee's views on quality and standards appears to be a distrust of the effects of institutional autonomy. The autonomy of higher education institutions, as it currently exists, provides overwhelmingly positive and fundamental social and educational benefits for society. These could easily be lost in the Committee's desire

to exert a more uniform approach to matters that are central to that autonomy, ranging from teaching, to the assessment of students, to the award of degrees.

QAA believes that, taken as a whole, the Committee's recommendations in respect of quality and standards would create, in effect, a monolithic, centralised higher education system which would have profound implications for students, universities and society at large. This could well include the stifling of pedagogical creativity and innovation; a reduction in the diversity of providers and provision - which would be difficult to reconcile with the widely accepted need to increase and broaden participation in higher education; a tendency for higher education courses to regress towards an artificially and externally imposed mean; and the creation of an excessive and unprecedented regulatory system, with its attached bureaucratic overhead.

The primary responsibility for academic standards and quality in UK higher education rests with individual universities and colleges, each of which is independent and self-governing. QAA checks how well they meet their responsibilities as equal members of the national higher education community, identifying good practice and making recommendations for improvement. We believe this remains the best and most cost-efficient way of assuring quality and standards.

A centralising of control in the way proposed by the Committee would contrast sharply with developments across much of the rest of Europe, where the trend is towards establishing a greater distance between the state and higher education and moving away from the tradition of national curricula and national examinations.

QAA itself has a UK-wide role and the Committee's proposed changes, which are limited to English universities and, in our opinion, are unlikely to be adopted elsewhere, could end what is internationally recognised as a single UK higher education system.

The scope of the Committee's inquiry was necessarily broad. Consequently it is understandable that in some areas it may not have fully understood the origins and complexities of the development of the current quality assurance system.

For example, recommendation 84 proposes the introduction of a review of teaching quality into QAA's procedures. Teaching quality assessment was a key component of QAA's Subject review method which ran between 1993 and 2001. During that time more than 3,000 individual reviews were carried out, of which only 0.9 per cent of all provision observed was found not to be satisfactory. Following completion of one complete round of Subject reviews, the procedure was discontinued in 2001 at the request of the Government, owing to the disproportionate administrative and financial burden that it placed on institutions, and the diminishing value of the reviews. Any reintroduction of this process would reimpose this bureaucratic burden, for no clear benefit. QAA also believes it is important that the Committee's recommendations should be viewed in the context of the Government's Principles of Better Regulation.

In addition, there are some proposals that appear to overlook existing mechanisms which are already in place and delivering the Committee's desired outcomes. In particular, the Academic Infrastructure and its components and the broad range of enhancement activities that QAA undertakes, such as those relating to credit transfer, and guidance on student feedback and admissions, are already meeting these needs.

Another recommendation that relates to our role concerns the classification of degrees, that is, that QAA should define the characteristics of each class of honours

degree and ensure that the standards which each university draws up and applies are derived from these classification standards.

We believe that this would not remedy the problems already identified by the sector itself in the Burgess report and would add an unnecessary layer of complexity, delivering little benefit. It is our view that higher education institutions should move quickly to the introduction of Higher Education Achievement Reports (HEARs) as recommended in the Burgess report.

We would also suggest that the Committee may not have taken fully into account the implications, practicalities or implementation costs of its proposals. It is doubtful if the desired outcomes (even were they to be achievable) would warrant the very considerable outlay of time and money required, especially when higher education is under extreme financial pressure and all available resources are being directed to front line teaching and learning.

QAA's responses to specific recommendations in the report

26. In our view, a prerequisite for a system of credit transfer is a national system that validates quality assurance and the standards of credits earned by students. (Paragraph 85)

The majority of higher education institutions in England already have long-standing credit accumulation and transfer arrangements. Following the publication of the [Burgess Group report](#), QAA worked with the Credit Issues Development Group (CIDG) to build on these arrangements and develop a national credit framework for higher education in England and guidance to accompany its implementation. [The Higher education credit framework for England](#) was published by QAA in August 2008, on behalf of the CIDG.

QAA was also instrumental in the development of a set of [overarching principles and operational criteria for a common approach to credit between the further education and higher education sectors](#). The overarching principles and operational criteria, developed by the Joint Forum for Higher Levels, are designed to explain the commonalities in credit practice between the further education and higher education sectors and facilitate progression.

Both the *Higher education credit framework for England* and the overarching principles and operational criteria emphasise the importance of robust quality assurance arrangements in the award of credit.

32. We conclude that it would assist prospective students if higher education institutions presented in a consistent format, which facilitates cross-institutional comparisons, the time a typical undergraduate student could expect to spend in attending lectures and tutorials, in personal study and, for science courses, in laboratories during a week. In addition, universities should indicate the likely size of tutorial groups and the numbers at lectures and the extent to which students may be taught by graduate students. We conclude that the higher education sector should develop a code of practice on information for prospective students setting out the range, quality and level of information that higher education institutions should make available to prospective undergraduate students. (Paragraph 98)

The current discussions relating to the introduction of a revised method for audit are taking fully into account the need for institutions to be clear about workload expectations, and the reasons why those expectations are considered to be

appropriate. This would not mean that arrangements should be identical in each institution, but would require each institution to be explicit about its own arrangements. The programme specification would provide an appropriate vehicle for enhanced public information.

65. First, if the Higher Education Academy is operating effectively and meeting its strategic aims, we consider that, working with the Quality Assurance Agency for Higher Education, it should be able to play a key role in promoting and enhancing academic standards and in driving forward the changes we suggest are needed in this Report. If, however, the Academy is not working effectively we conclude that it will not be able to play its full part in promoting and enhancing academic standards in higher education. (Paragraph 180)

QAA has a [strong working relationship with the Higher Education Academy](#) and we welcome the opportunities recommended in this report to develop further our quality enhancement activities and support the sector in maintaining academic standards. The senior managements of both organisations meet together regularly and a liaison scheme between QAA and the Higher Education Academy's subject centres has been in place since 2007. The outcomes of this interaction have included a joint conference on quality enhancement and on 'working together'.

71. We recommend that the Government in consultation with the higher education sector, including student representatives, draw-up and agree a strategy to require all university staff engaged in regular and significant teaching to undertake appropriate training in pedagogical skills and also to encourage staff across higher education institutions in England to obtain a professional teaching qualification. We further recommend that the Government require higher education institutions as a condition of support from the taxpayer to have in place programmes to enhance the teaching effectiveness of all academic staff who have teaching responsibilities. We recommend that, within its review processes, the QAA monitor and report on the extent to which institutions are demonstrably meeting this requirement. (Paragraph 187)

The [current audit process](#) includes specific enquiry and report on institutions' arrangements for assessing the effectiveness of their teaching staff. QAA will look carefully at whether this scrutiny should become a mandatory part of a revised audit methodology.

We consider the training and support of postgraduate students who are undertaking teaching duties to be of particular importance in this area.

72. We conclude that the Government and the higher education sector, in consultation with student representatives, should draw up and implement arrangements applicable across the sector which allow students to convey concerns about poor teaching and which ensure that universities take effective remedial action. We consider that such arrangements once established should be subject to review by the Quality Assurance Agency to ensure that they allow students to convey concerns and that remedial action is taken, where warranted. (Paragraph 190)

At present student complaints and appeals are handled through institutions' own processes, which are informed by [Section 5: Academic appeals and student complaints on academic matters](#) of QAA's *Code of practice for the assurance of academic quality and standards in higher education (Code of practice)*. However, we believe there is a need for greater monitoring of the way this is managed and are considering this in the development of the new audit method. Where an institution's

procedures are exhausted, and the issue remains unresolved, the complainant has the option of going to the Office of the Independent Adjudicator (OIA). QAA's Causes for Concern procedure (CfC) also has a role to play in this area, and this could be made more effective by increased sharing of information between the OIA and QAA.

74. Whilst individual institutions may have developed effective institutional or course-based guidance, we conclude that there is a need for a code of practice across the higher education sector, which builds on the QAA's "Code of practice for the assurance of academic quality and standards in higher education Section 6: Assessment of students". It is our view that, whether at the level of module, course, department or institution, students should be provided with more personalised information about the intended parameters of their own assessment experience. It is unacceptable and disheartening for any piece of work whether good, average or poor to be returned to a student with only a percentage mark and no comments or with feedback but after such a long time that the feedback is ineffective. We recommend that the Government require the Higher Education Academy to draw up, in consultation with the higher education sector, including representative students, a code of practice on (i) the timing, (ii) the quantity, and (iii) the format and content of feedback and require higher education institutions to demonstrate how they are following the Code when providing feedback to students in receipt of support from the taxpayer. (Paragraph 196)

QAA is pleased that the Select Committee recognises the value of [Section 6: Assessment of students](#) of the *Code of practice*. The *Code of practice* is regularly updated to ensure that its content is current and relevant. We do not agree with the need for an additional code of practice, which would be confusing, duplicative and possibly conflicting, but recognise that the existing *Code of practice* may need to be updated in the light of the recommendations for work to be undertaken by the [Higher Education Academy](#). Again, the programme specification could be the vehicle for providing the necessary level of course/programme-specific information. QAA is at present evaluating the Academic Infrastructure with a view to ensuring that it is meeting its objectives, and the effectiveness of the *Code of practice* will be included in that evaluation.

78. In our view, it is matter of some regret—and a symptom of complacency—that it was only after pressure from outside the higher education sector, that is, the media, ministers and us that it appears that the QAA used the "cause for concern" process to examine more generally institutions' capacity to assure the academic standards and quality of their higher education programmes and awards. We consider that the QAA needs to make up for lost time and develop its expertise in this area. In addition, we consider that the Government and higher education institutions must find the resources to support this endeavour. (paragraph 216)

QAA established its [Causes for Concern procedure](#) in March 2007 to examine 'any policy, procedure or action implemented or omitted by an institution that appears likely to jeopardise the academic standards and quality of its higher education programmes and/or awards'. We welcome the Committee's acknowledgement of our expertise in this area. As might be expected, QAA has expanded and further publicised the procedure as it has evolved and developed, including after issues were highlighted by the media, ministers and Committee. It is right that QAA should be responsive to matters brought to our attention through the public domain, and we recognise this fully in the continuing review of our processes.

As a result of the Committee's 'pressure' we received a small number of new allegations of Causes for Concern. On investigation most of these turned out to be

personal grievance cases and ineligible for enquiry under the terms of the scheme. The remainder have been the subject of enquiries in accordance with the terms of the scheme.

We also welcome the Select Committee's recognition that this work requires considerable resource.

*80. We consider that in not judging "the standards themselves", the **QAA** is taking an unduly limited view of its potential role. (paragraph 219)*

The question of whether QAA should examine specific standards was examined fully in 2001-02 during the development of the current quality assurance arrangements. There are approximately 40,000 individual higher education programmes in England, and it is unrealistic to expect an annual assessment of the standards of each by an external agency.

There is already a mechanism in place to examine 'the standards themselves' - external examining. QAA therefore feels it is more important to ensure that the external examining arrangements work efficiently and effectively rather than introducing a new system that would result in considerable duplication, possibly irreconcilable conflicts of academic judgement, and very large additional costs. That is not to say that external examining is not in need of reform, and QAA has already made proposals, along with other organisations, about how such reform might best be achieved.

*81. We have concluded that, on balance, the **QAA**, rather than be abolished, should be reformed and re-established as a Quality and Standards Agency—possibly by Royal Charter (which was the arrangement used to set up the former Council for National Academic Awards)—with the responsibility for maintaining consistent, national standards in higher education institutions in England and for monitoring and reporting on standards. We also recommend that the remit of the new body include—if necessary, on the basis of statute—a duty to safeguard, and report on, standards in higher education in England. It should also report annually on standards to Parliament. We further recommend that, to ensure its independence, the funding of the Agency's activities in England be provided through a mechanism requiring half its funding to be provided by the Higher Education Funding Council for England and half from levies on higher education institutions in England. In making these recommendations we are looking to see a fundamental change in the operation of the **QAA** and that, if this cannot be achieved within two years, the **QAA**/Quality and Standards Agency should be abolished and an entirely new organisation be established in its place. (paragraph 220)*

We note with interest the Select Committee's comments on the constitution and funding of QAA. While we fully concur with the observation regarding the need for QAA to be independent, we do not believe that there are any constitutional or legal obstacles that prevent us from doing our job, or responding to changed circumstances, or adapting to new requirements. Our portfolio of work has evolved considerably since 1997 and will continue to do so.

83. We recommend that the Government investigate and establish whether students in England spend significantly less time studying, which includes lectures, contact time with academic staff and private study, than their counterparts overseas and that, if this proves to be the case, establish what effect this has on the standards of degrees awarded by the higher education sector in England. (paragraph 224)

We note the Select Committee's recommendation. However, although it is important to consider the amount of time that students spend studying, the key point is that the learning opportunities made available to students - lectures, seminars, tutorials, library and learning support, laboratory and practical sessions, private study, assessment and feedback - should be designed to help students achieve the specified learning outcomes.

There are considerable problems in establishing the actual workload of students in different countries (as opposed to official pronouncements about it), and this needs to be investigated with the very greatest of care. QAA is concerned that headline numbers may be used incorrectly to establish false comparisons.

We have proposed further work on student workload and contact hours in the follow up to our [themed enquiries into concerns about academic quality and standards](#). The 'Sustaining quality and standards' action plan identifies six areas for further investigation:

- student workload and contact hours
- language requirements for international students
- recruitment practices for international students
- the use of external examiners
- institutional assessment practices
- public information.

84. We conclude that the reformed QAA's new remit should include the review of, and reporting, on the quality of teaching in universities and, where shortcomings are identified, ensuring that they are reported publicly and addressed by the institution concerned. We also conclude that the QAA should develop its current policy of giving greater attention to institutions' policies and procedures in relation to improving quality and that the QAA should produce more guidance and feedback based on its institutional reviews. (paragraph 226)

The review of teaching quality was a key part of QAA's [Subject review](#) method which was in operation until 2001-02. Although an important and valuable part of the evolution of quality assurance in England, that value was progressively reduced, and Subject review was eventually discontinued at the request of the Government owing to the disproportionate financial and other resource costs that it placed on institutions.

It is important to acknowledge the complexity of factors that contribute to good learning by students and not to accept simplistic or irrelevant paradigms. Unlike in schools, formal teaching is only one element of the learning activity, and often only a minor one. More important is the range of learning opportunities to which students have access. Experience has shown that it is not useful to focus solely on the delivery of lectures. It is the quality of the whole experience, not just the quality of didactic teaching, that really matters. We consider that the cost of reviewing the quality of teaching across all the programmes delivered in England would be disproportionate to any value it would be likely to yield.

We are surprised at the Select Committee's recommendation that QAA should produce more guidance and feedback based on reviews of institutions. We already publish a large number of analyses and guidance documents aimed at supporting institutions to develop and enhance the management of their quality and standards and the learning opportunities they provide for students, including:

- [Quality matters](#) (topics of the moment)
- [Outcomes from institutional audit](#) (47 thematic analyses based on review reports)
- [Outcomes from collaborative provision audit](#) (13 thematic analyses based on review reports)
- [Enhancement Themes](#) (extensive suite of thematic projects managed in Scotland)
- [Learning from.../overview reports](#) (periodic, retrospective, lessons and key messages from review programmes)

*85. We recommend that all higher education institutions in England have their accreditation to award degrees reviewed no less often than every 10 years by the reformed **QAA**. Where the Agency concludes that all or some of an institution's powers should be withdrawn, we recommend that the Government draw up and put in place arrangements which would allow accreditation to award degrees to be withdrawn or curtailed by the Agency. (paragraph 229)*

QAA believes this to be an area for further consideration, despite the potential legal barriers, having itself proposed something similar to Government in 2003 (when it was rejected). We believe the concept of inalienable [degree awarding powers](#) (and the associated official recognition of institutions) has become problematic in an international context. The legal complexities involved in allowing for the withdrawal of degree awarding powers would, however, be formidable. A simpler approach might be for inclusion in the existing Department of Business, Innovation and Skills' List of Recognised Bodies (which currently depends only on an institution having degree awarding powers) to be subject to review, perhaps normally every 10 years. However we would also wish to sound a note of caution against basing any possible future arrangements for the review of degree awarding powers on a US analogy. The US higher education system is very different from that in England in terms of both its structure and legal basis, and the statements made about it in the Committee's report are, to the best of our knowledge, inaccurate. Degree awarding powers in the USA are granted by individual states, using a variety of locally determined criteria, which differ greatly in their rigour and robustness. The 10-year accreditation process is undertaken by institutionally-owned regional accreditation commissions, again using a variety of processes, but regional accreditation does not affect the degree awarding status of universities. Its principal impact on institutions now lies in it being a requirement for receipt of Federal funding support. Moreover, most of the regional accreditation agencies accredit institutions for varying periods of less than 10 years.

*86. We recommend that the reformed **QAA** have powers to carry out reviews of the quality of, and standards applied in, the assessment arrangements for an institution's courses, including, if necessary, its degree awarding powers, in response to external examiners' or public concerns about the standards in an institution or at the direction of the Secretary of State. (paragraph 230)*

QAA already reviews assessment arrangements through the current [Institutional audit](#) procedure. The CfC procedures also allow for public or other concerns to be brought to our attention. We have seen no evidence that these do not, at present, provide adequate safeguards, though we do believe they need to be kept under active review.

87. We see grounds for concluding that the system for reviewing the concerns of academics about standards needs to be rebalanced to provide greater protection for

those raising concerns alongside a clear move to independent and external review. Our initial view is that such a service which provides, for example, independent arbitration and adjudication might be the responsibility of a reformed QAA. We also recommend that Government bring forward legislation to strengthen the whistle-blowing procedures in the 1988 Education Reform Act to provide greater protection to academics. We are reluctant to go further and to reach firm conclusions without carrying out a more detailed inquiry into adequacy of the protection for whistle-blowers within higher education—and this is an issue that a successor committee with responsibility for scrutinising higher education may wish to return to—but on the basis of the evidence from individual academics and the UCU we consider that there could be a systematic problem here. (paragraph 235)

QAA is not at present adequately constituted or resourced to undertake a broader role as a recipient of general whistle-blowing allegations, which could potentially conflict with some of our other activities. In particular, we have no remit in respect of causes for concern relating to employment or health and safety. We recognise the importance of ensuring adequate protection for whistle-blowers, however, but suggest that such a role might sit more appropriately with an expanded role for (for example) the OIA.

92. We conclude that a key task of a reformed QAA, in consultation with higher education institutions and government, should be to define the characteristics of each class of honours degree and to ensure that the standards which each university draws up and applies are derived from these classification standards. (Paragraph 256)

If the current degree classification arrangements had any intrinsic value and were thought to be worth preserving, then this recommendation might have some merit. As framed, however, it would only serve to prop up a system that has already been deemed to be not fit for purpose, by adding additional layers of complexity and making new bureaucratic demands on institutions. QAA agrees with the [conclusions of the Burgess Group](#) and has itself long maintained that the current degree classification system is outdated and in need of replacement. We welcome the introduction of the Higher Education Achievement Report (HEAR), which should be implemented as quickly as is expedient. We also believe that the current degree classification arrangements should be phased out as soon as practicable and not given an artificial extension of life.

94. We conclude that the QAA should review the methodological assumptions underpinning assessments for degrees to ensure that they meet acceptable statistical practice. (paragraph 260)

QAA agrees that assessment must be underpinned by sound principles and practice, including those related to statistical assumptions, and believes that this should probably be a more specific focus for [Institutional audit](#). However, we would suggest that the academic development work required (as opposed to the review of its effectiveness) would be more appropriately undertaken by the [Higher Education Academy](#).

97. The starting point for the repair of the external examiner system is the recommendation made by the Dearing Report to the Quality Assurance Agency "to work with universities and other degree awarding institutions to create, within three years, a UK-wide pool of academic staff recognised by the Quality Assurance Agency, from which institutions must select external examiners". We conclude that the sector should now implement this recommendation. Drawing on the evidence we

received we would add that the reformed QAA should be given the responsibility of ensuring that the system of external examiners works and that, to enable comparability, the QAA should ensure that standards are applied consistently across institutions. We strongly support the development of a national "remit" for external examiners, clarifying, for example, what documents external examiners should be able to access, the extent to which they can amend marks—in our view, they should have wide discretion—and the matters on which they can comment. This should be underpinned with an enhanced system of training, which would allow examiners to develop the generic skills necessary for multi-disciplinary courses. We conclude that higher education institutions should only employ external examiners from the national pool. The system should also be transparent and we conclude that, to assist current and prospective students, external examiners' reports should be published without redaction, other than to remove material which could be used to identify an individual's mark or performance. (paragraph 273)

We agree with some parts of this recommendation, and in particular that the external examining arrangements are in need of reform; this is already being taken forward by a group of stakeholders, including QAA.

However, we do not believe that a centralised structure is likely to meet the outcomes sought by the Select Committee, and the cost of running such a large programme centrally would far outweigh the advantages to be derived from a national system. It would also reduce the specific benefits that institutions gain from being able to tailor to their particular circumstances and needs the tasks and procedures that they require of their external examiners.

QAA believes that there ought to be a common core of tasks that are undertaken by all external examiners in all institutions and that each examiner should be required to certify that they have carried these out in accordance with the current national expectations (as contained in a revised version of [Section 4: External examining](#) of the *Code of Practice*). We do not agree that external examiners should necessarily have the right to change marks, as that could give them an arbitrary and unaccountable right, with no check or balance, to undermine the responsibility of those properly appointed to examine students.

More important than this, we believe, is the need to ensure that external examiners are properly trained and rewarded.

108. It will also naturally be part of such a development that the relationship between this new agency [reformed QAA] and the Higher Education Academy be reviewed, including clarification of the key responsibility for quality enhancement in regard to the student experience. Although we had reservations about the operation of the Academy, it could and, we believe, should have a key role in promoting and enhancing academic standards. (Paragraph 308)

There are aspects of quality enhancement that rightly attach to both QAA and the [Higher Education Academy](#). The important thing is to ensure that there is no duplication - and we do not believe that there is.

Equally it is important to ensure that there are no gaps. QAA works closely with the Higher Education Academy to ensure effective co-ordination of our complementary areas of work.

Conclusions

The IUSS Select Committee's final report is a useful contribution to the continuous discussion of quality and standards that characterises the UK higher education system. It makes some interesting and helpful recommendations, particularly relating to the need for a fully independent quality assurance body. However, the report lays out a vision for a very different higher education system from that which is currently in place.

The Select Committee is, in effect, recommending a centralised system of higher education, governed by a set of national standards. We are not persuaded that a sufficient case has been made to justify such a profound change in the way higher education in England is organised. A proposal of this kind would require extensive legislative change and agreement amongst all stakeholders in the sector. The Committee's proposed changes for English universities could also end what is internationally-recognised as a single UK higher education system.

All stakeholders will need to consider carefully what the Committee's recommendations would mean not only for safeguarding the public interest in higher education standards, but also for protecting the value to society in having a diversity of autonomous, creative and innovative higher education institutions.