Introduction

This response to the call for evidence has been written drawing on evidence from QAA’s extensive engagement with our members across the four nations of the UK and with over 25 quality bodies and regulators overseas.

Whilst Sir Michael Barber’s review is forward looking, the adaptations made by higher education providers to COVID-19 have many learning points for the sector as a whole.

Since the impact of the COVID-19 pandemic led to higher education providers in England moving to digital teaching and assessment in March 2020, QAA has produced 29 sets of guidance and supporting resource, which we have made freely available to all in order to provide as wide a level of support as possible to the sector. Our intention has been to offer support in developing solutions to the demands that COVID-19 has placed on providers and the sector.

In preparing our guidance, we consulted extensively with QAA Member institutions. More than 2,000 representatives from 276 organisations attended 28 events, allowing us to learn about their experiences and approaches to adapting provision. At a senior level, we also undertook a series of conversations with over 150 PVCs and heads of institution. As a result of COVID-19, most providers had to pivot quickly to a greater use of digital approaches to assessment and delivery. In March, the immediate priority was ensuring the safety of staff and students, as operations and students moved off site. The focus during April and May was on assessment planning, before moving into operational and transition planning for the 2020-21 academic year over the summer. While providers have taken differing approaches, there are common themes that have been reflected in our guidance.

The focus of our guidance has been to help higher education institutions maintain the quality and standards of their provision, no matter what the mode of delivery. The guidance has been underpinned by the Expectations and Core and Common practices of the UK Quality Code for Higher Education, along with the accompanying advice and guidance. This response highlights some of the key findings presented in our guidance, that relate to the areas of interest set out in the Office for Students’ call for evidence. Our role in preparing the guidance was to provide technical information, and share effective and emerging practice, to help autonomous institutions make decisions to help preserve and enhance quality and standards. In practice, we found that many institutions have accelerated their programmes to enhance the quality of their digital provision.
Challenges of remote delivery

For all providers, charting a path through the COVID-19 crisis involved two distinct phases: a first phase incorporating emergency actions taken immediately before or at the onset of lockdown to implement business continuity plans, conduct risk analysis, close campuses, ensure the safety of students and staff, followed by consideration of how to approach teaching and assessment for the remainder of the academic year.

As set out in QAA’s Initial Guidance on Quality and Standards published in March 2020, many of the immediate challenges were logistical in nature, responding to the need to implement change at pace. For example, institutions could not assume that all students (or staff) had access to the equipment and broadband needed to fully engage with online learning and assessment. The Quality Code’s Core practice for quality states that providers should have ‘sufficient and appropriate facilities, learning resources and student support services to deliver a high quality academic experience’. QAA’s initial guidance emphasised the need for flexibility to meet the needs for individual students and the need to avoid one-size solutions in order to satisfy the Core practices of the Quality Code. It also stressed the need for clear communication to students as to what had changed, what the impact might be and how to help them make informed choices.

Another initial challenge faced by providers was ensuring that academic standards were secured in the delivery of remote learning. QAA’s guidance on Assessing with Integrity in Digital Delivery identified that students who were working remotely, away from their familiar academic community in challenging circumstances, could feel unsupported and vulnerable. As a consequence, they could be vulnerable to targeting by, for example, essay mills which pose a threat to academic standards. This made it important to provide clear communication and support for students who were facing changes to their modes of teaching, learning and assessment.

In order to maintain and secure academic standards, providers needed to ensure that learning outcomes were delivered and maintained. Any changes to expected learning outcomes needed to be clearly understood by students, while ensuring that they had access to, and were supported through, changes so that they could achieve those learning outcomes. The guidance identified a number of ways in which providers could promote positive academic practices in an online environment. These included planning provision from the student’s perspective, offering moderated discussion forums or other forms of peer mentoring, and being clear on expectations and understanding of what was and was not permissible in assessment and examinations.

As well as these overarching challenges arising from a move to remote teaching learning and assessment, it was clear that providers needed to take account of the needs of students who faced particular circumstances that might be exacerbated in their new environment. The QAA guidance document Securing Academic Standards and Supporting Student Achievement set out what some of these might be, and how they could be approached by providers. For example, students who already require specific support - such as those with disabilities requiring reasonable adjustments were made - would require further and careful consideration to ensure the current changes did not present them with additional challenges. Alternative assessments and adjustments to online teaching also needed to recognise the needs of other students with specific learning requirements, such as those with caring responsibilities, those in digital poverty or studying overseas for whom broadband and internet provision may be difficult to access, and those who were ill or self-isolating.

While the experience of each provider varied, all those we spoke to had established a senior COVID-19 steering group to oversee the institutional response to the pandemic. Most met daily at the outset of the lockdown. Steering groups appointed sub-groups with responsibility
for key activities. These would typically include subgroups with responsibility for teaching and learning provision. The first task of teaching and learning subgroups would typically involve consideration of such issues as to whether to adopt a ‘no detriment’ policy, and the replacement of invigilated, closed book in-person examinations by, for example, ‘take home’ or ‘takeaway’ examination or open book examinations conducted over a 24-hour period.

Approaches to no detriment policies were the subject of QAA’s document on No Detriment Policies: An Overview. It did not make recommendations, and was not promoted as guidance, but posed a series of reflective questions to help providers decide on the appropriate policy for their institution. For example, arguments in favour of a policy might be that it would allow students to be free to focus on their learning and realising their academic ambitions rather than worrying about risks to their academic outcomes due to matters that are beyond their control. Conversely, providers might feel that a no detriment policy would risk the creation of a visibly explicit ‘COVID’ generation whose degree classifications might not be considered reliable.

One area of potential challenge that became clear through our conversations with providers was that the rapid pivot to greater use of digital delivery, and the speed at which change took place, highlighted the variety and disparate use of terminology used to describe the digital learning experience on offer across the sector. Early on, it was clear from our discussions with providers that most intended to offer a part virtual, part physical attendance (although many providers then clarified that for at least the first term of the 2020-21 year there would be no physical attendance). The challenge for providers was how to then effectively communicate and describe their offer to students.

To support providers to build a common language to describe digital approaches to programme delivery and support them in setting student expectations of their programme, QAA produced guidance: Building a Taxonomy for Digital Learning. In common with other QAA guidance produced during the COVID-19 pandemic, it was not intended to be directive, but rather to provide a framework for institutions to develop their own terminology, to allow consistency and clarity. So, for example, the guidance considered the application of potentially interchangeable terminology, such as ‘online, virtual or digital learning’, ‘blended or hybrid learning’ and ‘distance or remote learning’ to encourage consistency.

Similarly, the guidance sought to build a taxonomy of students’ digital experience, to give students clarity about what was on offer, and how it compared with other programmes, to allow them to make informed choices about the programmes they were applying for. The intention was not to make a judgement about the quality of learning experience, but rather to categorise and describe the different student experience depending on the type and volume of digital engagement. The categories ranged from a ‘passive digital engagement/experience’, where little or no aspect of the learning and teaching activity on offer was designed to be delivered digitally, to ‘immersive digital engagement/experience’ where digital learning and teaching activities were designed by a provider as the only way in which students will engage, both with the programme and with each other.

The taxonomy was developed specifically in response to indications from our discussions that there was a developing need for consistency across institutions arising from the rapid and large-scale transition to some kind of digital or blended delivery. While it is too early to assess implementation, we have had many indications that the taxonomy is a welcome approach.
Successes in digital delivery

In addition to the taxonomy referred to above, QAA published Questions to Inform a Toolkit for Enhancing Quality in Digital environment. The purpose of the toolkit was to pose a series of reflective questions to assist in the development of institutions’ digital provision. The toolkit focused on a range of key considerations for maintaining quality in a digital environment including strategic focus, programme design/approval/management, student-centred learning, teaching and assessment, teaching staff, and learning resources and student support. So, for example, in relation to programme design, there can be a temptation to focus on technologies and tools of digital delivery which could take place at the expense of digital pedagogy. To militate against this, teaching staff were encouraged to identify whether they have considered the best pedagogical approach for teaching students digitally and in a specific context. This could take into account pedagogical practices, innovation and the learning outcomes of the programme.

As with the taxonomy, the questions institutions were encouraged to think about were largely applicable regardless of the context of the COVID-19 pandemic. Because of this they will continue to be relevant to digital delivery once the impact of the pandemic has passed. The pandemic has accelerated approaches to enhancing the quality of digital environments and pedagogy that will bring long-term benefit. It is also worth noting that negative reactions from students about the quality of digital teaching arising from COVID-19 enforced changes seemed to be as much about the quality of the technology and platforms as the quality of the pedagogy and content. As institutions improve the former, it will allow greater focus on the pedagogical elements of delivery.

QAA has worked with institutions across the sector during the pandemic, and they have been keen to share emerging and effective practice. As well as allowing for overviews of differing approaches, this has also enabled us to share specific examples of practice. For example, the thematic guidance on Securing Academic Standards and Supporting Student Achievement, referred to above, sets out a range of practical examples to help providers decide on the modes and timings of assessment. These include offering assessments over a 48-hour window to allow for students’ local circumstances such as immediate surroundings, connectivity and time zone differences. Similarly, in deciding whether submission dates should be adjusted, we were able to share practice such as providers giving all students the opportunity to defer some or all of their assessments due in April or May to early July, without the need to provide evidence of extenuating circumstances. Future approaches to digital assessment were the subject of Assessment Rebooted, a joint report by Jisc and Emerge Education which might of be interest to the Review.

This desire and willingness of higher education institutions to share practice is a credit to the collegiate approach adopted within the sector. It is a positive arising from the pandemic that should have longer term implications. In the coming months, QAA will be working with member institutions across the UK to articulate some of the positive pedagogical practices that have arisen as a consequence of COVID-19 to develop further resources for the sector.

Engagement has also allowed the identification, discussion and early resolution of issues that have the potential to generate tension. For example, one approach to preserving the integrity of remote examinations is to introduce a requirement for online proctoring. Indeed, some professional, statutory and regulatory bodies (PSRBs) indicated that closed book, invigilated assessments would be a requirement if graduates were to achieve professional certification. Some students have, however, expressed concerns over potential privacy issues arising from online proctoring. In order to help identify and consider approaches to these issues, QAA has convened PSRBs fora to facilitate discussion between PSRBs and providers to identify common approaches and compromise positions. Most PSRBs operate
across the UK (and some in Ireland) and their expectations of providers can vary quite widely. QAA continues to engage with them to facilitate dialogue.

Digital poverty

The Review document sets out a series of indicators to define digital poverty, including the need for appropriate hardware and software, internet access and study space. In our discussions with providers, the impact of a deficit in one or more of these areas could clearly impact upon a student’s ability to effectively engage. Our guidance document Securing Academic Standards and Supporting Student Achievement, referred to above, identifies a number of scenarios where digital poverty had a detrimental impact not just for themselves but also for others. For example, students working on group projects who experience poor Wi-Fi access could see the impact not only on their own ability to engage, but also their collaborators. Some institutions advised us that teaching staff who live in rural areas found access to reliable broadband a real challenge in developing and delivering content.

Digital poverty could have a particular impact for providers with transnational education provision, or who work with partners in countries outside the UK. Some of our international partners have told us that reliability of electricity supply impacts on students on UK programmes. The guidance recommends that these providers consider and communicate with in-country governments, regulators and accreditation bodies, as COVID-19 mitigation procedures might differ.

We received examples of digital poverty particularly from providers who are situated in areas with multiple indicators of deprivation and whose recruitment is substantially drawn from their local area. In these cases, the issues revolved around students not having sufficient or appropriate space to study, or having additional caring responsibilities because of shielding or unwell family members, or students simply unable to fund access to hardware and broadband for themselves. In these cases, solutions ranged from providing loan equipment, to making emergency hardship funding available, to granting mitigations to students for particular pieces of work. All providers we spoke to were making efforts to support students to find solutions, in preference to allowing students to defer or withdraw from their studies.

Examples of positive practice included providers asking students to complete a ‘local circumstances’ form or a survey, so they have a way of expressing the constraints under which they are operating, and which could be used in mitigation of lower than expected academic performance. This was particularly relevant when dealing with international students who have returned to their home countries in identifying issues that might not have otherwise been anticipated. For example, as well as experiencing accessibility issues, students might need to manage an environment where the local jurisdiction places restrictions on internet access and where study needs might cause potential breach of local censorship laws.

In many cases, providers were offering additional flexibility in assessment opportunities. Some providers were taking practical steps to support students who were experiencing one or more of the elements of digital poverty. For example, offering laptops to students or establishing an emergency IT hardship loan fund for students without suitable computer and/or broadband connections so they could purchase a laptop with 3G/4G enabled data capability.
Looking ahead

In our conversations with providers and sector leaders it was clear the consensus was that all future higher education programmes will incorporate a substantial component of digital learning, with the blend of digital and other provision being determined by the requirements of the discipline and the student cohort served. Some sector leaders did express a note of caution about excessive future reliance on digital provision with one saying there is ‘no evidence anywhere of the success of 100% online learning programmes for 18-year olds’. Many disciplines, such as performing arts and laboratory subjects, will continue to require the physical presence of students, even allowing for the introduction of techniques of virtual reality.

Much provider resource and strategic operation in the early weeks of the 2020-21 academic year has focused on managing the transitions of students into institutions, and in many cases having to deal with significant outbreaks of COVID-19 among student populations. Significant work is also going into academic planning for this academic year and beyond – one provider told us that converting a single module from physical to digital delivery, with appropriate pedagogic review and design elements, would typically take 80 hours of effort. Providers are working at pace to condense this for multiple modules - we heard another provider estimate they were intending to review 2,000 modules. The great majority of providers have adapted blended learning strategies designed to promote ‘curriculum resilience’. This might involve, for example, staff preparing for digitalisation by undertaking several weeks of training in teaching modules online. Providers have adopted streamlined approaches capable of processing large numbers of modules quickly without compromising institutional oversight of academic standards.

With regard to assessment in 2020-21, some providers have reflected on what has been learned about the robustness of various assessment methods during the lockdown period, including the difficulties of assessing some practical learning outcomes through remote assessment. Other providers with a firm commitment to examinations are exploring remote proctoring which could form part of invigilated take-home examinations, and shorter-format online examinations which are thought to mitigate students finding answers to questions online.

We have found that providers are planning their approaches to future blended learning provision in a principled and consistent manner. Universities whose schools and faculties enjoy substantial autonomy are centralising some planning operations, so that plans have been made through a combination of academic-led and centralised decision making. One university has adopted a two-pronged approach between central and department-led planning by creating a cross-university expert group to draw up design principles for ‘online rich’ blended delivery. Programme and module leaders then translate these principles into teaching and learning ‘norms’ describing the mix of live teaching, structured and supported teaching and learning, and independent student learning that best suits the programme in question. Another university has identified a ‘threshold student entitlement’ for all modules to be delivered digitally which included a minimum number of hours of activity each week, at least one personal interaction with a tutor each week, and workarounds for the absence of laboratories, and practice and performance-based facilities.

Providers understand the need to prepare incoming and returning students for the blended approach that will characterise their learning, teaching and assessment in the academic year 2020-21 and beyond. One university has modified existing MOOCs for new and returning students in the light of the changes made because of COVID-19. Helping students to understand what to expect from online teaching, how to take ownership of learning, study at home, manage their time, and undertake independent learning (which is likely to become a more important skill than it was because of the increase in online learning) all feature in this
MOOC. Another provider is developing online monitoring systems capable of taking over from in-person attendance monitoring, with a view to minimising disengagement among new and returning students and embedding a new approach to community and social frameworks into its programmes. This view also featured in QAA’s survey of small, specialist providers, a number of which identified the need for a shift in culture to promote collective wellbeing.

The flexibility of digital learning is particularly conducive to a model of higher education that involves ‘un-bundling’ of degree programmes, to allow for the accumulation of credits over a period longer than traditional in UK universities. The flexibility of digital learning opens new possibilities that are in line with recent announcements from the Westminster Government about policy changes that allow for a ‘lifelong learning’ approach to higher education provision and funding. We see increased flexibility of provision as a positive development for the higher education sector, although it will also need further consideration in respect of the assessment of quality and standards, such as whether the achievement of defined educational outcomes should primarily be at the module or programme level.

The student perspective

In this response we have repeatedly referenced the importance of student engagement. We have found that most institutions and leaders acknowledged and welcomed an increased significance for the student perspective in designing new modes of educational delivery. While it is true that most students are comfortable with a blended approach to learning, providers also recognised the importance of not exaggerating the homogeneity of the UK student cohort, with different demographics having different needs.

The importance of the student perspective has been reflected in the guidance QAA has produced to support providers. Our document Preserving Quality and Standards Through a Time of Rapid Change sets out four guiding principles that providers could adopt to ensure that they have the right decision-making systems in place, with students appropriately situated at the heart of those systems. One principle states that ‘Providers engage with students and staff in planning changes to delivery and assessment of teaching and learning’ with a further stating that ‘Provider planning scenarios are flexible and responsive to student needs’. These principles are in line with the Core and Common practices in the Quality Code and its accompanying Advice and Guidance.

Early responses conducted by providers or their students’ unions indicate that students were generally positive about their experience of blended learning at the end of academic year 2020-21. This indicates that, in general, there was effective engagement with student bodies during this time.

Additional evidence: a cautionary note

QAA engages extensively in international networks and partnerships. We do this to promote UK higher education and provide reassurance to overseas authorities about the quality of UK degrees. In some countries, degrees delivered and/or assessed online have not been accepted as legitimate qualifications. The COVID-19 pandemic has led to a much greater acceptance of online provision but, in many cases, this is only temporary. This also prompted debate in the global and regional networks about whether it is, or can be, properly externally quality assured. QAA will remain visible and active in these conversations on behalf of our members. A simple assertion that degrees are high quality may not suffice in all circumstances.

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