



The Impact of the COVID-19 Pandemic on Accredited Programmes of Higher Education

**An Analysis of Surveys of Professional,
Statutory and Regulatory Bodies**

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Contents

Executive summary	1
Introduction: Purpose of this report	2
Background: The role of PSRBs in UK higher education	3
QAA and PSRBs	3
How this report is organised	3
Findings	4
Medicine and dentistry	4
Subjects allied to medicine	4
Biological and sport sciences	5
Veterinary sciences	5
Agriculture, food and related studies	6
Physical sciences	6
Mathematical sciences	6
Engineering and technology	6
Architecture, building and planning	6
Law	7
Business and management	7
Media, journalism and communications	7
Design, and creative and performing arts	7
Geography, earth and environmental studies	8
Unclassified	8
Annex A	9

Executive summary

This report presents an analysis of responses by professional, statutory and regulatory bodies (PSRBs) to surveys carried out by the Quality Assurance Agency for Higher Education (QAA) and the Department for Education (DfE) about the impact of the pandemic on programmes of higher education which these PSRBs accredit or endorse. QAA and DfE surveyed 130 PSRBs as part of this study, of which 60 (or 46%) responded. QAA officers also carried out a brief review of PSRB websites to identify what information PSRBs have made available about the implications of the pandemic for providers and students.

The principal, and perhaps obvious, finding of this report is that the pandemic has had most impact on programmes containing practical elements which restrictions on human movement and contact have made difficult or impossible to organise or sustain, such as work placements and practical assessments. Whereas most PSRBs surveyed have endeavoured to be as flexible as they can be in allowing changes to these elements, other considerations (such as statutory responsibilities for the protection of the public) impose limits to this flexibility, meaning that students may have to wait to complete their programmes until the restrictions are lifted.

The analysis also finds (again, perhaps unsurprisingly) that PSRBs' initial response to the pandemic has focused on the implications for final-year students approaching or involved in assessments which may determine entry to professions. Whereas some respondents did mention students in other years, there appears to be an assumption (or hope) among most that any disruption to the practical elements of accredited programmes for students in earlier years can be made good before the end of their studies. Clearly this depends on epidemic-related restrictions being and staying lifted, and on these practical elements (particularly work placements) not being adversely impacted by wider changes in related professions (such as job shortages).

Some respondents to the survey reported that where practical assessments were being delayed until restrictions are lifted, providers had indicated that they would continue to support students, in some cases into the next academic year. At a time when resources for providers are already stretched, it is not clear if providers have considered the full implications of this commitment.

Finally, although this analysis finds a considerable amount of good practice among individual PSRBs around discussions with accredited providers about any changes, with a few exceptions, there is little evidence of PSRBs - even in the same subject area - talking to each other about the implications of the pandemic. Furthermore, the review of PSRB websites found much variability in the amount and specificity of information for providers and students about the implications of the pandemic. Whereas some PSRBs have provided comprehensive information tailored to the interests of different audiences, others (perhaps as many as a half) give only brief, generic statements or no information at all. Given the profound and possibly lasting changes the pandemic appears likely to cause, there appears to be significant value in closer collaboration among PSRBs over their response to the crisis, and a strong argument for the provision of better and more targeted information.

Introduction: Purpose of this report

This report presents an analysis of responses by PSRBs to surveys carried out by QAA and the DfE concerning the impact of the COVID-19 pandemic on programmes of higher education which these PSRBs accredit or endorse.¹ More specifically, these surveys were designed to gauge whether and how PSRBs have engaged with providers around the changes to accredited programmes brought about by the pandemic, and whether these changes are likely to affect (or even jeopardise) accreditation, which may of course have an impact on students' progression to further study or employment. The questions of PSRBs contained in the two surveys are set out in the table below.

QAA officers also carried out a brief review of PSRB websites to identify what information PSRBs have made available about the implications of the pandemic for providers and students.

Of the 130 PSRBs surveyed, 60 responded (46 to the QAA survey and 18 to the DfE survey; four PSRBs responded to both). A full list of the PSRBs surveyed is at Annex A.

Questions in the QAA survey	Questions in the DfE survey
1. Are you able to accredit the degrees awarded by your HE provider this year? If not, what are the barriers you are facing? What help would be useful to you, to overcome those barriers?	1. If guidance has been produced by your organisation on how you expect programmes and assessments to be delivered to still meet your accreditation requirements?
2a. Do you set any assessments or deadlines for HE providers?	2. Is the guidance currently available interim or final?
2b. How are you monitoring the situation in terms of actions being taken by the providers you accredit (or equivalent)?	3. How have you made HE providers aware of this guidance?
2c. What arrangements are being made for students that are not in their final year? What decisions are the responsibility of the degree (or other qualification) awarding body/organisation and what regulations are laid down by you as a PSRB?	4. Is there guidance and reassurance available to students too?
3. What impact might the situation have on the registration process to enable students to progress into the profession?	5. Other comments from PSRB
4. Are there any concerns that you wish to raise at this point that might impact on students' completion and progression into the profession?	

¹ For the purposes of this report, 'accredited programme' is used as an umbrella term to describe any programme accredited, approved or endorsed by a PSRB.

Background: The role of PSRBs in UK higher education

PSRB is an umbrella term for a very diverse group of bodies that include professional bodies, regulators and those with statutory authority over a profession or a group of professionals. PSRBs engage with the higher education sector in various ways. This report is focused on PSRBs' role in the approval, recognition and accreditation of higher education programmes. Here they accredit or endorse programmes and courses that meet professional standards, provide a route through to the professions, or are recognised by employers.

PSRBs also set and regulate standards for entry into their particular professions and often participate in quality assurance activities - including the programmes offered by higher education providers.

QAA and PSRBs

QAA is the independent body entrusted with monitoring and advising on standards and quality in UK higher education. It is dedicated to checking that the three million students working towards a UK qualification get the higher education experiences they are entitled to expect.

QAA works across all four nations of the UK. It also builds international partnerships to enhance and promote the reputation of UK higher education worldwide.

QAA is committed to raising the profile and understanding of the work of PSRBs and enhancing communication between the higher education sector and its regulators. One of the principal ways in which QAA does this is through the PSRB Forum, which offers a chance for those involved in the education of professionals to consider key issues, share good practice, and keep up-to-date with higher education policy. The Forums have to date been funded by QAA Member institutions and, for many years, were arranged in collaboration with Professions Together (previously known as the UK Inter-Professional Group). This group no longer seems to be active and so QAA has been sole organiser in recent years. The Forums also provide an opportunity for government departments and sector organisations to engage with a broad selection of PSRBs. More information is available on the [QAA website](#).

How this report is organised

This report is organised according to the Common Aggregation Hierarchy (CAH) - a group of 21 broad subject areas maintained by the UK Higher Education Statistics Agency. The 60 PSRBs who responded to one or both of the QAA and DfE surveys were categorised according to the CAH and their responses to the questions above were analysed alongside other PSRBs in the same subject area. Two respondents could not be classified and their responses were analysed separately.

The numbers of PSRBs which responded to one or both of the surveys within each subject area are shown in the table below. Subject areas in which there were no responses are not reported.

CAH Code	CAH name	Number of responses within this area
1	Medicine and dentistry	1
2	Subjects allied to medicine	13
3	Biological and sport sciences	5
5	Veterinary sciences	2
6	Agriculture, food and related studies	1
7	Physical sciences	2
9	Mathematical sciences	1
10	Engineering and technology	11
13	Architecture, building and planning	5
16	Law	2
17	Business and management	9
24	Media, journalism and communications	1
25	Design, and creative and performing arts	2
26	Geography, earth and environmental studies	3
	Unclassified	2
	Total	60

Findings

Medicine and dentistry

One PSRB from within this subject area responded to the QAA survey. It explained that accreditation of programmes ought not to be affected this year due to the fact that providers (rather than the PSRB) are responsible for making sure students meet the required outcomes of the programme. However, the body is monitoring completion rates carefully to ensure any changes to assessments made in response to the pandemic do not lead to a sudden increase in pass rates. The PSRB also explained that it was mindful of the need to maintain a balance between the heightened demand for new entrants to the NHS workforce driven by the pandemic with the high standards demanded of professional practitioners.

Subjects allied to medicine

13 PSRBs from within this subject area responded to the QAA survey. Of these, three are regulated by the Health and Care Professions Council.

Many respondents in this area stressed their overriding (and, in some cases, statutory) responsibility for the protection of the public, and the constraints this responsibility imposes on changes to higher education programmes - particularly work placements and practical assessments to develop and determine students' ability to practise safely. That said, most were also keen to stress the flexibility inherent in their accreditation arrangements, and that, in most cases, providers have at least some discretion to modify the content, structure and assessment arrangements for courses as long as students could continue to meet the agreed learning outcomes - a 'flexible but robust' approach as one respondent put it. Given the sudden introduction of lockdown measures, most respondents in this subject area had

adopted a pragmatic approach of allowing providers to make modifications first and inform the PSRB later, rather than requiring any changes to be approved before they could be introduced. As one respondent put it, 'How a provider has handled the crisis will form part of the next scheduled review.'

Where it has not been possible to modify assessments to be consistent with both COVID-19 restrictions and existing learning outcomes, PSRBs in this subject area have advocated a range of measures including delaying assessments until restrictions are lifted and allowing students to carry forward into professional training some competencies that have not been assessed - in some cases with the continuing support of their higher education provider. At least one respondent in this area has created a dedicated forum for providers to discuss and share ideas about their response to the pandemic. Most seem focused on the implications of the pandemic for final-year students only.

As to implications for graduates' progression into employment, the PSRBs in this category are roughly split between those facing rising workforce demands in the NHS, and those operating in other sectors (such as environmental health) where progression opportunities may be stifled - not by graduates' inability to practise safely but rather a shortage of jobs.

Biological and sport sciences

In common with respondents in the previous category, the overriding priority for public safety is the lens through which most PSRBs in this category regard changes to accredited programmes. Also in common with most respondents in subjects allied to medicine, respondents here stressed the discretion providers have to change programmes provided learning outcomes continued to be met, and have (with the exception of one respondent) allowed providers to adopt a pragmatic approach of 'change first, inform the PSRB later'. The exception was one PSRB which has required all providers to propose changes before they are confirmed and insisted that these changes should not be considered permanent. Fortunately, this PSRB reported that it was, in the main, 'extremely pleased' with the way providers have responded.

As with the previous subject area, most respondents in this category focused their initial efforts on final-year students hoping to graduate from accredited programmes. One respondent was hoping that students not in their final years would be able to 'catch-up' with practical elements suspended during the pandemic in the next academic year and beyond. Also in common with the previous subject area, several PSRBs reported concerns about a lack of job opportunities for graduates of accredited programmes due to the economic downturn.

Veterinary sciences

Again, the principal difficulties for providers and students of accredited programmes in veterinary sciences are associated with the restrictions on work placements and practical assessments. The main PSRB in this area reported that it has been in touch with providers about changes to assessments for final-year students and had issued guidance to them to ensure any changes would be acceptable. This body expected that, through a combination of changes to assessments and postponement of others until after restrictions are lifted, final-year bachelor's degree students should be able to graduate and register on schedule. However, students on accredited Foundation degrees are not able to progress to the profession on schedule due to the current prohibition on staging an integral face-to-face assessment. This was the first example of a respondent to these surveys stating categorically that students would be unable to progress to registration for as long as the restrictions on face-to-face exams endure.

Agriculture, food and related studies

The only respondent in this subject area declared itself confident that programme leaders for accredited programmes would work 'professionally and with integrity' to make sensible changes necessary to reflect the pandemic restrictions.

Physical sciences

Both respondents in this subject area have adopted the same pragmatic approach described above - of allowing providers to make changes to programmes to reflect the pandemic restrictions provided the modified programmes continue to meet existing learning outcomes. They are also allowing providers to make these changes without seeking the PSRB's approval, as long as any changes are subject to providers' own quality assurance systems. As one of them put it, '...we do not expect HEIs to inform us immediately of the changes they make, but we do ask that you send us details of all changes made as soon as is reasonably practicable and certainly before the end of the programme for each cohort.' The same PSRB also reported that it was relying on providers themselves to communicate any programme changes to students.

Mathematical sciences

The only respondent in this subject area reported that, should a university be required to make changes to assessments due to the COVID-19 epidemic, as long as standards are maintained by the provider, the accreditation of the programme will be unaffected.

Engineering and technology

11 PSRBs within this subject area responded to one or both surveys. This included the Engineering Council - the overarching regulatory body for the UK engineering profession - and eight of the Council's licensed accrediting institutions (institutions to which the Engineering Council grants licences, allowing them to assess candidates for inclusion on the national register of professional engineers and technicians).

While the Engineering Council does not have direct accreditation relationships with course providers, it has told its licensed accrediting institutions (LAI) that they should be 'as flexible as possible' in considering requests and proposals from providers to modify programmes and assessments as long as learning outcomes continue to be met. It has also asked these institutions to keep and communicate records of issues arising in the sector and created a template for providers to record any changes to their programmes for reporting to the relevant LAI.

None of the LAIs who responded to the surveys themselves, or either of the two bodies not licensed by the Council, reported any significant divergence from the Engineering Council's position.

Architecture, building and planning

As in most other areas, in architecture the principal PSRB is allowing providers to make changes to programmes provided these are what it calls 'epidemic-related' and approved by providers' internal quality assurance systems. A bigger difficulty in this area is the shortage of opportunities for students to gain the work experience stipulated by the PSRB owing to the temporary closure of workplaces in the industry (including offices and building sites), which may be followed by a longer-term paucity of placements caused by economic downturn. At the time of responding, it seems as if the PSRB was still considering its response to this challenge.

Law

Both professional bodies responded to the QAA survey. The first has delayed its national, centralised examinations until August and is working on further contingencies should it still not be possible to hold them then. It also asked providers to inform it of any proposed alternative arrangements for the exams providers set and mark themselves, discussed general principles around changes at a meeting with course leaders, and then met with external examiners to discuss consistency of approach across all providers. External examiners then recommended whether they wished to approve the proposed alternatives, and these recommendations were approved by the PSRB.

The other PSRB has allowed providers to make changes to undergraduate assessments before notifying the body for information, but any changes to postgraduate assessments must be approved before they are implemented. It has, however, told providers that it will allow more flexibility in the practical arrangements for postgraduate provision, for example, by permitting examinations through remote proctoring systems.

The first PSRB anticipates a significant but, as yet, unquantified, impact of the pandemic on the legal profession, which is likely to impact graduates' progression into employment.

Business and management

Of all the subject groups in this report, PSRBs in business and management display what might be described as the most accommodating approach to programme changes. This perhaps reflects the absence of statutory responsibilities about protection of the public and the low level of practical examinations.

Nine PSRBs in this subject area responded to one or both surveys. Most of these are following the same 'change first, inform later' approach described above. One has removed its requirement for assessments to be 60% exam based for the duration of the crisis, and said it was 'relying on the professionalism' of colleagues at providers to assess properly. Another has confirmed that it will recognise assessments in 2020 regardless of changes (though only for this academic year). Only one respondent said explicitly that it expected providers to submit their alternative assessment arrangements for review, with the implication that these alternatives might not be endorsed.

Media, journalism and communications

There was only one, short response in this subject area. The respondent reported that accreditation would continue provided the teaching department was able to award the degree.

Design, and creative and performing arts

Two PSRBs in this subject area responded to the DfE survey. One reported simply that its accreditation activity was 'in hibernation' due to many of its accreditors being aged over 70 or in other groups vulnerable to the symptoms of the virus. The other body reported a change to its accreditation procedures to reflect the pandemic, but said little about the impact on accredited programmes. This body also said that it had always experienced difficulties communicating with students due to GDPR legislation.

Geography, earth and environmental studies

Two PSRBs from within this subject area responded to the QAA survey and one to the DfE survey.

One explained that students on accredited courses were likely to experience problems in completing the normal fieldwork, but that providers could introduce alternative ways of assessing the competencies normally assessed through that element. 'This is a moment for pragmatism and flexibility', it reported. This body also acknowledged that its attention has been focused on final-year students, and not on students in other years.

The second respondent in this category reported that graduation from a recognised course is not a pre-requisite for membership; other graduates could be admitted on a case-by-case basis meaning that any loss of recognition by an institution would not necessarily hinder graduates' professional progression.

The third respondent reported that it is seeking the same balance as most other respondents - continuing to require accredited programmes to deliver against agreed learning outcomes while allowing providers to adjust learning and teaching and assessment to reflect restrictions on staff and student movement and contact.

Unclassified

Two of the PSRBs who responded to the QAA survey do not have an obvious home in HESA's Common Aggregation Hierarchy. Both of these do not anticipate any particular difficulties with providers shifting to alternative modes of assessment consistent with the lockdown restrictions, and therefore no problems with graduates gaining the requisite qualifications for entry to the professions.

Annex A

The table below lists the PSRBs surveyed by QAA and DfE for this study in alphabetical order. Bold type denotes those PSRBs which responded.

Architects Registration Board
Association for Nutrition (AfN)
Association for Physical Education
Association for Project Management (APM)
Association of Accounting Technicians (AAT)
Association of Chartered Certified Accountants (ACCA)
Association of MBAs (AMBA)
Association to Advance Collegiate Schools of Business (AACSB)
Bar Standards Board
BCS the Chartered Institute for IT (British Computer Society)
British Acupuncture Accreditation Board (BAAB)
British Association for Behavioural and Cognitive Psychotherapies (BABCP)
British Association for Counselling and Psychotherapy (BACP)
British Association of Lecturers in English for Academic Purposes (BALEAP)
British Association of Sport and Exercise Sciences (BASES)
British Association of Sport Rehabilitators and Trainers (BASRaT)
British Dietetic Association (BDA)
British Kinematograph Sound and Television Society (BKSTS) CIC trading as International Moving Image Society
British Psychological Society (BPS)
Broadcast Journalism Training Council (BJTC)
Chartered Association of Building Engineers (CABE)
Chartered Financial Analyst Institute (CFA)
Chartered Institute for Securities and Investment (CISI) formerly Institute of Financial Planning
Chartered Institute for the Management of Sport and Physical Activity (CIMSPA)
Chartered Institute of Arbitrators (CI Arb)
Chartered Institute of Architectural Technologists (CIAT)
Chartered Institute of Ecology and Environmental Management (CIEEM)
Chartered Institute of Environmental Health (CIEH)
Chartered Institute of Ergonomics and Human Factors (CIEHF)
Chartered Institute of Housing (CIH)
Chartered Institute of Library and Information Professionals (CILIP)
Chartered Institute of Logistics and Transport (CILT)
Chartered Institute of Management Accountants (CIMA)

Chartered Institute of Marketing (CIM)
Chartered Institute of Personnel and Development (CIPD)
Chartered Institute of Plumbing and Heating Engineering (CIPHE)
Chartered Institute of Public Finance and Accountancy (CIPFA)
Chartered Institute of Public Relations (CIPR)
Chartered Institution of Building Services Engineers (CIBSE)
Chartered Institution of Civil Engineering Surveyors (CICES)
Chartered Institution of Highways and Transportation (CIHT)
Chartered Institution of Waste Management (CIWM)
Chartered Institution of Water and Environmental Management (CIWEM)
Chartered Insurance Institute (CII)
Chartered Management Institute (CMI)
Chartered Society of Designers (CSD)
Consortium for the Accreditation of Sonographic Education (CASE)
Council for Dance, Drama and Musical Theatre (CDMT)
Dental Schools Council
Energy Institute (EI)
Engineering Council
European Foundation for Management Development (EFMD)
Faculty of Advocates
Financial Reporting Council
General Chiropractic Council (GCC)
General Dental Council (GDC)
General Medical Council (GMC)
General Optical Council (GOC)
General Pharmaceutical Council (GPhC)
Grounds Management Association
Health and Care Professions Council (HCPC)
Institute of Biomedical Science (IBMS)
Institute of Brewing and Distilling
Institute of Careers Guidance (ICG)
Institute of Chartered Accountants in England and Wales (ICAEW)
Institute of Chartered Foresters (ICF)
Institute of Chartered Shipbrokers (ICS)
Institute of Direct and Digital Marketing (The IDM) [now Institute of Data and Marketing]
Institute of Economic Development
Institute of Environmental Management and Assessment (IEMA)

Institute of Financial Accountants (IFA)
Institute of Food Science and Technology (IFST)
Institute of Groundsmanship [now Grounds Management Association]
Institute of Highway Engineers (IHE)
Institute of Historic Building Conservation (IHBC)
Institute of Hospitality
Institute of Marine Engineering, Science and Technology (IMarEST)
Institute of Materials, Minerals and Mining (IOM3)
Institute of Mathematics and its Applications (IMA)
Institute of Measurement and Control (InstMC)
Institute of Medical Illustrators (IMI)
Institute of Physics (IOP)
Institute of Physics and Engineering in Medicine (IPEM)
Institute of Translation and Interpreting (ITI)
Institute of Travel and Tourism (ITT)
Institution of Agricultural Engineers (IAgrE)
Institution of Chemical Engineers (IChemE)
Institution of Civil Engineers (ICE)
Institution of Engineering and Technology
Institution of Engineering Designers (IED)
Institution of Fire Engineers (IFE)
Institution of Gas Engineers and Managers
Institution of Mechanical Engineers (IMechE)
Institution of Structural Engineers (IStructE)
International Moving Image Society
Joint Board of Moderators for Institution of Civil Engineers
Landscape Institute (LI)
Market Research Society (MRS)
Medical Schools Council
Merchant Navy Training Board (MNTB)
National Association of Veterinary Physiotherapists (NAVVP)
National Council for the Training of Journalists (NCTJ)
Nursing and Midwifery Council (NMC)
Professional Publishers Association (PPA)
Royal Aeronautical Society (RAeS)
Royal College of General Practitioners
Royal College of Nursing

Royal College of Occupational Therapists (RCOT)
Royal College of Veterinary Surgeons (RCVS)
Royal Geographical Society
Royal Institute of British Architects (RIBA)
Royal Institution of Chartered Surveyors (RICS)
Royal Meteorological Society (RMetS)
Royal Society of Biology
Royal Statistical Society (RSS)
Royal Town Planning Institute (RTPI)
Social Work England
Society of Operations Engineers
Solicitors Regulation Authority (SRA)
The Chartered Society of Forensic Sciences (CSFS)
The College of Optometrists
The College of Podiatry
The Geological Society
The Institution of Engineering and Technology (IET)
The Registration Council for Clinical Physiologists (RCCP)
The Society of Sports Therapists
The Textile Institute
The Welding Institute (TWI)
Tourism Management Institute (TMI)
UK Council for Psychotherapy