**Royal Society of Biology Response to Future approaches to quality assessment in England, Wales and Northern Ireland: Consultation.**

**28th August 2015**

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

The Royal Society of Biology agrees with the general principles which will be used to underpin the approach to quality assessment within established providers of higher education.

In regard to point a) to “Be based on the autonomy of higher education providers with degree awarding powers to set and maintain academic standards” there needs to be an agreed framework which is used, for example the Framework for Higher Education Qualifications or the autonomy of the institutions will not align with the calibration of standards and establishing a consistent algorithm for the determining of awards (first / second class degree).

If the arrangements made to regulate this system are not implemented well, this will have serious repercussions for the students experience and are the highest risk to the upholding of standards.

We wish to highlight for point h) to “Adopt a risk- and evidence-based approach to co-regulation to ensure that regulatory scrutiny focuses on the areas where risk to standards and/or to the academic experience of students or the system is greatest” we request further clarification on what “co-regulation” entails as it could be interpreted in a variety of ways.

Within the document it was noted that academic staff (those doing the teaching) are not clearly identified as a key stakeholders in this process.

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

There are benefits in reducing the level of large-scale external scrutiny, for example, through making more effective linkages with the accreditation processes and reviews by PRSBs. However, it is difficult to see how the proposals can assure compliance, for all programmes, with the requirements set out in the ‘Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)’ (May 2015).

There needs to be provision for the regulatory system to be independent, it may be a conflict of interests for governmental bodies to be part of the external process, and funding bodies to have a responsibility to monitor standards.

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

Yes the RSB is broadly happy with this approach, as noted earlier the autonomous nature of universities means that no two institutions are the same. Paragraph 36 requires clarification “The funding bodies would expect to verify a provider’s approach, and would vary the extent of oversight for those providers able to demonstrate a strong methodology and mature internal governance arrangements”, this could be interpreted as a sliding scale of overview, where it may not be the case. There were concerns raised that there should not be financial implications in terms of fees for the “extent of oversight” required. There needs to be an “absolute” standard, which can be measured consistently across the sector.

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

The RSB supports the proposal to have a baseline for the quality of academic experience for students, the level should be maintained and publishing the data will enable this to be tracked and increase transparency of support for students.

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

The RSB agrees that there should not be a need to continually reassess and retest providers against the baseline requirements. However we do not think that market pressures are enough to ensure that the quality of the student experience (academic and otherwise) is maintained.

**Question 6: For Northern Ireland, do you agree that providers should provide annual evidence and assurance that they are meeting the baseline requirements for an acceptable student academic experience? 39**

The RSB supports this proposal.

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

Yes, providing there is sufficient evidence of independent external input to the processes and as long as the processes are robust. This approach may improve the relationship between funding bodies and providers.

Addressing paragraph 41 part d) “It includes significant and meaningful external input including from employers, national or international peers, recent alumni” although it is important that there are external processes in place the statement fails to recognise any internal processes and peer review of teaching quality that takes place which ensures consistency across departments.

Any review process can only be meaningful and focus "on the continuous improvement of learning and teaching and the student academic experience" (part e paragraph 41), if the academic staff are fully involved and consulted. Only Department /subject and external stakeholders are mentioned here.

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

The available data can form a basis for identifying and supporting improvement activities. However this will be dependent upon the quality and robustness of the data collected. Many universities will have concerns about the robustness of the National Student Survey and the Destinations of Leavers of Higher Education data and how it could be used. There are concerns that much data will lack the granularity required to be able to evaluate the academic learning experience and the gains. Information pertaining to individual courses may be lost within institutional data. Contextualising the data is important to be able to establish the real measure of benefit for a student. We do not believe that data relating to student outcomes should be the only data used. There are other data sets generated within HEIs that can be used to inform these processes as well. Quality of teaching cannot always be directly inferred solely on student outcomes - some material is extremely difficult to grasp and excellent teachers could be judged as lacking if they concentrate on delivering such material, and are judged solely on student achievement. Peer assessment is vital as a means of triangulation of assessment of teaching quality.

If the process of teaching and learning in HE, and the involvement of students in this, is truly a partnership (paragraph 44), then it should be clear with whom they are partnered, and it should include academic staff.

When considering the potential implementation of the teaching excellence framework, we will need to be aware of the purpose of data collected and where it may be used beyond that original purpose.

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

The RSB would be supportive of this, but again taking into account the need for robust data which can be evaluated encompassing the caveat of paragraph 55. “As greater reliance is placed on student outcomes data, the funding bodies are mindful of the need for any indicators to be meaningful and to measure the things that matter to students and other stakeholders. Data would need to be robust and valid, and its collection efficient and cost-effective. The funding bodies will continue to develop this strand of their work using a clear evidence base, expert input and consultation with the sector. Care is needed to be taken to ensure that particular metrics do not privilege particular providers, learners, or modes or levels of learning.”

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

The RSB supports efforts to improve the collection and analysis of feedback from HE learners in Northern Ireland.

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

Feedback back from RSB membership suggests that as there is already a level of expectation for governing bodies to be performing this role, for many established universities this should not be a problem, however newer providers may require guidance to set up appropriate structures and processes. For all providers there will need to be guidance relating to the exact role of the governing body in relation to quality assurance for the student experience and outcomes to avoid conflicts of interest. Training would need to be provided for new or lay board members within the quality assurance process. The membership of the governing bodies may require reviewing to ensure there is an adequate level of higher education expertise within the group.

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

An extended HAR would need to provide appropriate balance, as indicated: i.e. it would need to be a more substantial process, including relevant externality, but should not reproduce the scale of the current cyclical review method.

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

The RSB notes the proposal to update the Financial Memoranda between DEL and HE providers. In light of the proposed changes to governance and accountability envisaged, the RSB believes the current relatively informal accountability process operating within Northern Ireland may no longer be appropriate and would support the introduction of more formal periodic Assurance Reviews such as an extended HAR.

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

Responses have varied, with some respondents agreeing that a probationary period for new entrants would be useful, however it has also been suggested that this may be unnecessary if the process through which they are approved is robust.

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

Yes. Given that there is proposed to be a risk-based approach, international arrangements represent the highest risk activities.

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

Yes RSB would support this.

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

Feedback has been varied on this point, with some feeling that the current external examining system is working well. There is concern that a problem with the system currently is that a minority of providers do not attempt to work through the recommendations of their external examiners and that the new proposals do not address this point.

We believe that standardised training seems likes a sensible step forward but as noted in paragraph 87 “We are mindful that there could be unintended consequences of these proposals, particularly that placing further expectations on individual external examiners might discourage those considering becoming involved in the system, and that it would take a period of time to implement fully”. Any transitions will have to be managed carefully to ensure that there are sufficient numbers of trained external examiners. This process will incur additional expense for institutions to have training completed and further time out for staff who are external examiners.

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

In principle, strengthening of the external examiner system could be beneficial both in terms of strengthening the level of assurance the system can provide and in creating, within each institution a broader cadre of staff who are well acquainted with QA processes and their evaluation, particularly with regard to standards. However there will have to be sufficient resource to support this, financially and in terms of staff time (released from universities) involved in setting up and maintaining any new systems.

Many institutions struggle to find examiners at present so the creation of a register could be beneficial, provided the increased burden on examiners was not too great a deterrent; recognition of the role and ensuring that there was a good spread of examiners drawn from across the sector would be very important. There is a strong argument for the activity of examiners to be spread more across the sector: at present the vast majority of institutions engage examiners from their own mission groups.

However concerns have been raised that the establishment of an external examiners regulatory body as it could act as disincentive for academics to act as external examiners, potentially leading to cohort of “professional” external examiners who may lose touch with grass-roots teaching and learning.

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

Benchmark statements are utilised extensively within the sector, particular in relation to providing guidance for programme development teams. The proposals around creating communities of examiners to benchmark standards have some appeal, given the concerns over equivalence of standards but these proposals need very careful development if they are to be taken forward. The cost of undertaking this type of activity in monetary terms and in terms of staff time is likely to high, with a resource heavy project institutions would want to be sure that the benefits outweighed the costs.

We would like to know what the potential role of the QAA would be within the future structures.

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

Yes. The RSB currently accredits bioscience courses across the UK.

Currently the system varies depending upon the PSRB and the course as to how much input a PSRB has in course development. For example the General Medical Council is integral in setting the appropriate curriculum and standard when they register and accredit graduates.

There may be new or emerging subjects where there is not an obvious PSRB to use. For example in the field of bioengineering, would oversight fall to the Royal Society of Biology or the Institution of Engineering and Technology, or both? What mechanisms would be in place to support new subjects? Complex regulatory systems may deter providers from offering these new future facing subjects.

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

There is a potential conflict of interest for the governing bodies and there would also need to be the development of appropriate expertise within such bodies.

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

The RSB feels it would be beneficial to address this area, however these algorithms would need to be useful across breadth of degree results and should not be restricted to the critical areas of 2.1/2.2 and 2.1/1 borderlines. The perceived importance of attaining a 2.1 culturally as emphasised by employer’s job specifications is another issue that requires addressing.

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

There are a variety of bodies which can investigate areas of concern including the QAA. If the system is implemented there are implications in terms of resource required to ensure short turn-around times. The remit of the system would have to be made explicit to reduce confusion and minimise any overlap.

Paragraph 104 of the consultation document lists a number of ways through which concerns about the institutional standards might be raised by stakeholders. Some clarity is required on what the threshold should be to initiate an external intervention. What constitutes a ‘serious problem’ and who judges?

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

It would be good to have the option available however it should not be the standard course of action and would depend on the nature and scale of the issue.

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

RSB agrees with this.

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

It will be important to focus on how to ensure rapid response times and having a light touch approach.

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

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

Northern Ireland, uniquely within the 4 countries of the UK, no longer has an independent higher education oversight body - the Northern Ireland Higher Education Council was disbanded formally in 2009 and replaced by a departmental strategy implementation committee with representation from the Department for Employment and Learning (DEL) and the universities and serviced by the Department. The committee reports directly to DEL and does not publish its findings or deliberations. As such there appears to be a lack of independent and transparent scrutiny of the local universities and other HE providers compared to that found elsewhere in the UK. In the absence of independent oversight, the proposal to transfer greater responsibility for Quality Assurance to HEIs and their governing bodies in Northern Ireland is a matter for concern.