

Pearson College response to the Hefce consultation on future approaches to quality assessment in England, Wales, and Northern Ireland

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Consultation response

Question 1

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

We agree with the principles A, B, C, D, E, I and J and make the following notes about the others:

F We suggest a change to the way that F is expressed. We see innovation as a particularly important issue in the sector, and fear that the interpretation of the current rules may in practice create a cycle of conservatism rather than innovation. We would therefore express this principle more positively i.e. "ensure that providers are encouraged to be innovative" rather than merely as a negative i.e. "not prevented".

G We do not agree with G as we think some sort of cyclical review is needed to protect the reputation of the sector. We strongly agree with the principle of a high level of autonomy (principle A), but we consider that this needs to be balanced by a solid regular review system, and that review needs to be carried out by a team external to the HEI. In other words we think there is a need for a cyclical review of all HEIs, and that this cannot be replaced with governing bodies effectively signing off the compliance of their own institution. External review is the price of autonomy. HEIs perform an important public function in educating people, they are supported by substantial public subsidy, and students are making a crucial and expensive decision in choosing their place of study. Accountability should not be left to the institutions themselves, and public confidence could be undermined by the knowledge that HEIs effectively sign off on their own bill of health.

Other reasons for this viewpoint are: Firstly, the HE sector is going through significant change, the HEIs themselves will change in response, and the responses to these changes should be reviewed. Secondly, the system is becoming much more marketised and as HEIs act in a more market-orientated way the need for cyclical external reviews is only going to become more important. Thirdly, the awareness that you will be reviewed is much more likely to keep QA standards high, rather than the knowledge that you may never have to be reviewed again. Fourthly, reliance on HEIs effectively to self-certify through their Boards is unlikely to be as transparent as external independent review reports, and therefore may breach principle E.

Having said that, reviews do not necessarily have to be very frequent, and consideration could be given to making them every eight years instead of six years (saving a third of the cost) with every 4 years for new HEIs. Additionally the nature of the review itself could be simplified, the panel members changed to match the mission of the HEI under review, and the sanctions reviewed.

- H We broadly agree with this principle but it depends on how risk is defined. We should be working towards equal treatment for all HEIs (including alternative providers), and risk should be assessed by the likely impact on students and not on the category of type of HEI (as per the CMA report).
- K We suggest that this principle should have the word “and supportively” added, as any response by regulators should be on the basis of finding a constructive and supportive way forward, as that is in the best interests of the students and the reputation of the sector as a whole.
- L We strongly agree with this principle. The same rules should apply to all institutions offering HE in the UK, both public and non-public. We have recently reached a state of greater consistency than ever before in the sector, with all HEIs required to undergo exactly the same review known as HER. While it may be that HER could be simplified, we think it would be a shame if this progress towards consistency was lost, and consider that whatever review procedure is used should be the same for all. Unfortunately, the new system proposed in this consultation document only applies to the publicly funded sector. We understand that this is because HEFCE’s jurisdiction only extends to publicly funded HEIs. Nonetheless it means that in practice the proposals could represent a step backwards in terms of the coherence of the system as a whole. Also, given the rapid pace of change the status of current HEIs could change between now and 2025 and different reviews to different categories of HEI could become confusing. We would therefore propose that the QA system will be far more future-proof if it is based not on the status of the HEI but on the principle of parity for everyone. This point is also made in the CMA report.
- Therefore we propose that either HEFCE’s jurisdiction needs to change or QA should sit with a body authorised to oversee the entire sector. The UKVI’s requirements should also be taken into account, as otherwise we will just end up with multiple reviews again.

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.

Externality

We agree with the embedding of externality within internal processes as outlined in the proposals (with the exception of the proposal re calibration which we address below). However, we suggest that, with the exception of calibration, these mechanisms are largely already in place.

For the reasons already outlined we do not agree that the proposals are sufficient, because a key plank of externality in the current process has been removed, i.e. some kind of cyclical review. We consider such cyclical review necessary as articulated in response to principle G in Question 1. We note that the Standards and Guidelines for Quality Assurance in the European Higher Education Area Part 1 also has an expectation of external cyclical quality assurance. We further note that paragraph 37 of this consultation refers to the fact that we should remain compliant with the European requirements. We are concerned that the proposals could potentially be open to challenge.

Calibration

In relation to calibration and the consistency of degree classification algorithms, we note that although HEFCE is suggesting this, it could not itself require or implement it but would need the sector to take the lead in any such reform. It cannot therefore be fundamental to the proposals.

Whilst we agree that degree standards should be broadly comparable we consider that proper use of reference points, such as the FHEQ or equivalent, by institutions and external examiners (most of whom would have experience of external examining at more than one institution as well as experience of standards at their own institution) should ensure this.

Calibration activities, while attractive on the face of it, could have unintended consequences, for example a drive towards a "national curriculum", as it might be argued that it is very difficult to calibrate otherwise. We consider that such a drive would be damaging to the HE sector, would stifle innovation, decrease diversity, and would significantly undermine the principle of autonomy. Similarly, a drive towards a common set of algorithms would not necessarily take account of different disciplines or different learning, teaching and assessment strategies and is likely to drive institutions to be risk-averse and to choose the safe option. This is something best left to the individual institutions in accordance with principle A.

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?

There appears to be an inherent tension between the principle articulated at paragraph 30L above ("Work towards creating a consistent approach to quality assessment for all providers of higher education ") and the assumption that "one size" can no longer sensibly fit all.

We agree that there should be a consistent approach (for all providers of HE including Alternative Providers, post 92s, ancient universities, various mission groups colleges etc) but that this should have some flexibility within it. This consistent approach already exists to some extent (with the introduction of the HER method being applied to all providers within the remit of reviews, whether or not they have degree-awarding powers and whether or not they are publicly funded). The HER review method also has the inbuilt flexibility for an institution to be reviewed in the context of the actual responsibility of the institution (for example the different powers and responsibilities of an institution with degree-awarding powers as against those who do not).

We propose that additional flexibility using a variation of the HER system could take the form of a much more explicit requirement that judgements in a review must be made in the context of, and with reference to, the institution's mission. The make-up of the panel could also reflect the mission and context of the institution e.g. for an institution with a mission around industry engagement, the panel could include representatives from industry. Sanctions should also be revisited. It is unclear what the sanctions are if an HEI fails one of the key indicators in the publicly funded sector. At present there appear to be no consequences in the publicly funded sector and the extreme consequence of lost designation in the non-publicly funded sector. This should be made the same and there should be a range of sanctions proportionate to the issue. If there were some light touch consequences for smaller issues this may also help with the risk averse nature of the current system.

The current proposals also seem to imply that an institution that is older needs less oversight, simply by virtue of its age. This is clearly anti-competitive (e.g. cost of compliance would be lower), and illogical as there is no reason to assume that an older university created in a very different time and often carrying entrenched processes and ways of working should somehow be immune from the need for the same checks and balances as newer organisations. This also contradicts another of the assumptions in the proposals i.e. that once a "baseline" has been met there is no need for further testing.

We propose that a system needs to be developed to enable new providers to be onboarded in a supportive and constructive way but this having been achieved we consider that all providers, new or old, publicly-funded or not, should be subject to the same overall approach and that all should be subject to the same sanctions, following the principle in the CMA report that sanctions should be related to the risks facing students rather than the type of provider.

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?

It depends on what is meant by "baseline" and "academic experience".

If this proposal means a minimum academic standard that students must demonstrate before being awarded a degree then yes, we would agree.

To some extent we acknowledge that this contradicts principle A which states that HEIs set their own academic standards. Our view is that this should be done with reference to an agreed national framework that essentially defines the essence of a UK degree, and its minimum requirements. Currently this is achieved through the Quality Code and the FHEQ. Both HEIs and external examiners use these as a reference point in setting and judging standards. Something of this nature is probably needed if we are to maintain the concept of a UK degree.

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?

No, see responses to questions 1 (in particular principle G), 2, 4 and 7.

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?

No comment.

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?

Not on its own, no. Setting out a methodology is one thing, seeing how it works in practice, updating it, and checking that an institution is actually following its own methodology is another. A properly independent cyclical review (see Q1 G above) would be able to check these points.

We suggest that this proposal could also create odd behaviours. For example, once one HEI has a methodology that has been accepted as low risk by the funding body and that methodology has been published, then there would be an incentive for many others to simply copy it irrespective of whether it was appropriate for them, or whether they actually implemented it. The funding body would have no legal basis on which to do further checks (as many of the methodologies could look exactly the same) and therefore the checking of the methodology would become pointless. Alternatively, once the methodology of an HEI has been accepted there would be a strong incentive on the part of the HEI not to change it, even if parts of it became unsuitable, as updating it would serve no purpose apart from increasing a risk of raising an issue with the funding body (once you have passed an exam why risk doing it again?).

Question 8

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

The use of outcomes data is already expected to be, and should continue to be, at the heart of an institution's mechanisms to drive continuous improvement in learning and teaching, and in the students' academic experience. We also agree that data should be one of the indicators used to identify institutional performance and signs of concern.

However, it is not clear that the corollary to this is a shift away from consideration of institutional processes. If these processes are not robust and/or there is no testing that they are being followed, then no confidence can be placed in the data produced or the use the institution makes of that data to identify issues and drive improvement.

While the use of data for internal and external scrutiny, is and should remain, a key part of quality assurance, we nevertheless have a number of concerns relating to an over-reliance on data to identify concerns and drive improvement. We consider that quantitative data alone is not sufficient for these purposes and that qualitative judgements and contextual narrative are also needed. This is even more so if certain "optics" are to be financially rewarded eg through higher fees.

Without sufficient context and nuanced analysis, over-reliance on data can have unintended consequences. Currently the assumption appears to be that the key data will be student satisfaction rates, retention and completion rates within "expected" time periods, employment rates and pay, as well as possibly degree classification rates. There are potential issues with a number of these.

One overall point is that if these are linked to financial consequences, then institutions will need to focus on "maximising the optics" which may not be in the best interests of students across the sector as a whole or the individual mission of universities or fit with the multiple purposes of HE that the sector as a whole should serve. We set out 2 examples below.

Eg 1 The OU is committed to being open to all students at undergraduate level. Therefore one would expect a lower completion rate to Oxford. Should the OU change its mission to maximise a completion rate optic? And where students do not complete a whole degree, should we be suggesting that their education is therefore worth less? In fact 30% of undergraduate students in the UK are admitted without traditional UCAS points, including many "second chancers" and this has been considered a great benefit of the UK system. This kind of data is likely to create a disincentive to admitting "riskier" students going forward. Do we really want to say that UK HE should exclusively be for high achieving and (on average) wealthier students who will follow the three year pathway? Surely it is for a whole range of students, with those from less privileged backgrounds more likely to find their lives transformed by the experience.

Eg 2 Alternatively, what about a liberal arts school or university, whose mission is not focussed on employment but rather on the more traditional purpose of university of broadening the mind and learning purely for enjoyment. Should it be pushed into changing its mission so as to focus much more on employment outcomes? Surely we want to encourage a mix of universities.

The creation of a set of optics that apply to all institutions is likely to decrease diversity and increase homogeneity as universities will have little choice but to struggle to maximise the same optics. One proposal is to consider a suite of optics and universities choose to be measured by those that reflect their mission. On this basis the OU might be measured on the number of "non-traditional" students admitted, and Oxford on the number of teaching hours with international level professors.

Over-emphasis on data of the type listed above could have a negative effect on the widening participation agenda and have the effect of penalising institutions that are inclusive in their approach. It is far easier to take already high performing students from higher socio-economic groups as they are more likely to complete within a standard time frame and go on to employment (irrespective of the "training" they receive at university). It is not clear why it is in the public interest to reward such institutions over others struggling to raise education levels among the less privileged.

There is a growing need to develop an agreed measurement for "distance travelled", for both individual students and for the national student cohort as a whole. Increased

emphasis on any of the optics listed above will be misleading and potentially socially divisive without this. This should be an intrinsic part of any analysis. We therefore propose that the development of a distance travelled analysis this should be a fundamental part of any TEF working group.

In the context of the above we recently attended a workshop on data and grade inflation. At that workshop it was explained that HEFCE was currently carrying out an analysis of UCAS points and degree classifications compared across institutions. The assumption was that an institution whose students are, eg, doing better than "expected", should be investigated or suspected of grade inflation. This could penalise institutions whose students have travelled the furthest in terms of academic attainment. It also appears to assume that a C student will always be a C student and that educational aspiration is pointless. Given the strong link between private schooling, socio-economic group and UCAS points, this assumption also entrenches class division. Finally, this could create an unintended consequence of institutions not trying to ensure their students out perform their prior achievements as they may then face a bureaucratic inspection of grade inflation. This is therefore an example of data being potentially used unfairly and creating an unintended and undesirable consequence.

Analysis of retention data is currently based on the assumption that it is better for a person to have no HE experience than to complete only part of a programme, and that HE should be experienced within a set time frame. It does not allow for a student to experience HE flexibly through their lifetime, or to experience part completion. The implication is that low completion rates must mean low student satisfaction rates. But that is not necessarily true as can be seen from eg the OU's statistics on both these points. This assumption also works against a widening participation approach, driving behaviours in institutions which would deny HE to those whose lives may make participation from beginning to end in one bite impossible. The notion that "one-size" does not fit all applies to students as much as it does to institutions, and this is only likely to increase over the next 10 years. There is a need to increase incentives to create flexibility and respond to diverse student needs, as the drop in the part-time market has shown. As the sector diversifies and innovates there is an opportunity to look at alternative approaches which the current proposals would appear to stifle.

Over-reliance on data and league tables could incentivise the sector to maximise the optics for financial gain, especially if there is a link to the ability to raise fees.

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?

We consider that any change/new system should be piloted (note, however, our response to question 8).

We would raise three proposals that should be considered prior to changing the use of data within the sector.

Firstly, we stress the need for an approach to measuring distance travelled or value added, without which the current plans regarding student data may be counter-productive and operate against social mobility. This therefore needs to be addressed, both at the level of the individual student and that of the sector as a whole (i.e. by looking at an institution's overall contribution to distance travelled for students within the relevant national cohort).

Secondly, serious attention should be given to measurement of causation (of good student outcomes) rather than simply correlation.

Thirdly, data should be analysed for the sector as a whole and not just individual institutions (or just the aggregate of individual institutions). It is important that the sector as a whole fulfils the various purposes we need from HE, and it is not necessary that every institution within it fulfils all of those purposes. At present, attention appears to be on institutions individually and at the aggregate level, but not on the sector taken as a coherent whole. Without these three issues being addressed, the increased use of student data could in practice adversely affect the operation of the sector as a whole.

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?

No comment.

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.

No, please see our response to question 1 (principle G) above.

Governing bodies already do, and should, play a key role. However we consider independent cyclical review is also necessary for the reasons given in response to questions 1 (principle G), 2, 4 and 7 above.

We agree with the point made in paragraph 64 that the very fact of cyclical reviews is likely to ensure that an institution develops and implements robust quality assurance mechanisms, but we are not persuaded by the implication that some or all of these processes are unnecessary. If this is the suggestion then an analysis is needed of what processes should be discontinued and why. The Quality Code, which sets out the current expectations of HE institutions, was designed with the sector to reflect what they do and what they consider to be important.

There also appears to be a pervasive assumption in the proposals that Quality Review should focus only on what is important to students, however it is not clear which parts of what is currently reviewed are not important to this constituency. For example, if reliance was placed on outcomes data, governing body assurances and external examining alone, there would be no triangulation to ensure that, for example, processes relating to matters such as additional learning needs, admissions, mitigating circumstances and appeals were fairly and objectively operated, or that appropriate pastoral and careers guidance support was available or that students were not being inappropriately coached through assessments. While the NSS addresses some of these issues, it does not provide an opportunity to identify problems before they become major issues.

Finally, reliance on HEIs to self-certify through their Boards is unlikely to as transparent as external independent review reports, and therefore may breach principle E at question 1 above.

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?

No comment.

Question 13

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

No comment.

Question 14

Do you agree that there should be a 'probationary period' for new entrants to the publicly funded sector in England?

Yes. Our proposal is that new entrants (whether into the publicly funded sector or the overall HE sector) should be onboarded in a supportive and constructive way, and that after having proven their baseline ability should be reviewed at 4 years and then at 8 years. After that they should have 8 year cyclical reviews in the same way as the rest of the sector.

Once past the probationary period, all providers should be subject to the same overall approach and the same sanctions, following the principle in the CMA report that sanctions should be related to the risks facing students rather than the type of provider.

Question 15

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

We agree that international activities should be included in quality assessment arrangements – our comments on what those arrangements should be (for both domestic and international provision) are covered in our responses to the other questions.

In theory this is largely the case now. However, from speaking to many universities on this issue, there seems to be a serious problem of over regulation rather than under-regulation internationally. In practice it can be very difficult for universities to operate internationally, and the bureaucratic costs and perceived "QAA risks" can be very high. It is very important

that our UK universities can compete internationally, and this therefore needs to be explored along with ways of offering degrees in other languages. We propose that a working group be set up to specifically look at how operating internationally can be made easier.

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, but see our response to question 2 above.

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?

We agree that training is important. However, we consider that individual providers are best placed to provide this in the context of their mission and learning, teaching and assessment strategy. We also note that Chapter 7 of the current Quality Code now sets out what is expected of external examiners and, whilst we are aware of the concerns raised by the current HEA research into the effectiveness of the external examining system, it may be due to this being a transition phase with some HEIs taking longer to adopt the expectations in the Quality Code than others.

We would suggest a pilot training scheme and the development of a data base that HEIs can utilise, but the decision on whether to do so should be left to the HEIs under principle A.

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?

We would expect the training of external examiners and their use of appropriate reference points to be checked as part of a cyclical review (at which external examiners might be expected to attend).

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?

See our response to questions 1 (principle G), 2, 4, 7 and 11 above.

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?

We agree that these should be part of an institution's approach to quality assessment where relevant, although we would expect this already to be the case. It should also be noted that PSRBs vary in their approach and the extent of their regulation, some being relatively light-touch with reliance on the current activities of the QAA. Under principle A (autonomy) we propose that it should be the decision of the institution as to if and how to use PSRBs.

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?

See our response to questions 1 (principle G), 2, 4, 7 and 11 above.

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?

See our response to question 2 above.

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?

We agree that prima facie serious or material issues that have not been successfully addressed in a timely manner by the provider should be investigated rapidly through an external review of that provider.

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?

This might depend on whether the issue is a discrete problem or appears to be an indicator of failings which may call into question the robustness of the institution's overall approach to quality assessment. If the former, an investigation into the problem may suffice but if this uncovers a more systemic issue then a full review should be undertaken.

The sanctions should be the same for all providers as indicated in our response to question 3.

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?

Yes.

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?

No comment.

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?

No comment.

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?

No comment.