

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

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## Organisation details

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## Consultation response

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### Question 1

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

Pearson supports the principles in the main, especially those relating to achieving consistency, protecting the reputation of UK higher education, ensuring that quality assurance is proportionate, integrating students as partners in the processes and the use of appropriate external scrutiny. However, we would wish to better understand how an 'appropriate academic experience' would be determined and what the 'baseline requirements for an acceptable level of provision' would be.

### Question 2

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Do you agree that our current proposals for the use of meaningful external scrutiny as set out above are sufficient? If you do not agree, please indicate what additional or different external scrutiny you propose and provide the reasons for this.

Pearson considers these insufficient; as the consultation document states, governing bodies may have 'differing maturity, and different capability to provide reliable assurances about the student academic experience' and may therefore not fully meet the requirements of externality, nor have the required capability to be included as a form of external scrutiny. We would welcome a cyclical review to ensure ongoing independent checks.

As an awarding organisation, further clarity would be required on the roles for providers as separate from that of awarding organisations.

### Question 3

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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, however while 'the powers and responsibilities of those providers with degree awarding powers differ from those of providers that do not have these powers' there needs to remain a consistency of standards across UK higher education. Since alternative providers are not funded by the higher education funding councils, and therefore are not in scope of these proposals, we would welcome consideration of how consistent quality assurance approaches can be implemented which assure the standards for UK higher education.

#### Question 4

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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?

Yes.

#### Question 5

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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 re-tested against the baseline requirements for an acceptable student academic experience, unless material evidence suggests otherwise?

The consultation states it would 'assume that a provider will continue to meet baseline requirements unless or until material evidence emerges to suggest otherwise. We would wish to understand what 'material evidence' might suggest otherwise, and how timely this will be evidenced in order for action to be taken to maintain the reputation of UK higher education. Pearson would not support the view that 'market pressures (in the UK) were sufficient to incentivise them (providers) to ensure that they continue to offer a high quality student academic experience and excellent student outcomes, without the need for a repeated costly and extensive external scrutiny process at the baseline or threshold level'.

#### Question 6

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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?

Yes.

### Question 7

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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?

Pearson would welcome clarification on the process and triggers for a provider, undertaking its own review, and confirming through its annual accountability statement, that the reviews for the year had been completed; the outcomes discussed by the academic board, senate (or equivalent) and the governing body; and an action plan implemented, might be identified as being at risk, and require further intervention that that delivered by the internal review.

As an awarding organisation supporting providers in the delivery of Pearson higher education qualifications, we would suggest that further clarification on the roles of the provider / awarding organisation needs to be outlined.

### Question 8

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

Yes, however consideration must be given to ensuring that this approach does not have a negative impact upon widening participation.

### Question 9

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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?

Yes, this is welcome. It will offer a clear performance framework for providers, and offer support to governing bodies that will be able to benchmark provision.

### Question 10

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

Yes.

### 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.

We note that the maturity and capabilities of governing bodies in assuring student academic experience and student outcomes may vary, which may lead to a lack of consistency across UK higher education. Pearson would welcome further detail with regard to the role of the awarding organisation, as opposed the provider in providing such assurances.

### 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 above?

The HAR and MAA should not focus upon frameworks and policies to manage the quality of learning and teaching, but rather the outcomes and impact upon students.

### Question 13

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

Pearson welcomes the focus upon not only the student academic experience, but also the academic output standards.

### Question 14

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

Pearson considers that all providers, whether newly through the gateway for entry to the higher education system, or more mature providers, should be subject to the same risk based monitoring process. Furthermore Pearson would welcome a consistent approach across all UK higher education providers, including alternative providers.

### Question 15

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

Yes.

### Question 16

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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.

### Question 17

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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?

Yes, this would further professionalise colleagues, and further assure consistency of standards. However it would need to be ascertained what skills and experience would be required for admission to the register, and whether there would be instances where there could be removal from the register.

### Question 18

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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?

Pearson would welcome further understanding of how external examining processes and students' outcome data are triangulated to assure that the external examining system is effectively maintaining UK higher education academic standards.

### Question 19

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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?

Yes, however consideration would need to be given as to how these would apply across subjects and pedagogical approaches, and to ensure that they did not have the effect of restricting innovation in teaching and learning.

### Question 20

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

Yes, however there would need to be careful consideration of the different output standards of PSRBs, for example where standards are more aligned to employment routes and competencies than academic output.

### Question 21

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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?

Pearson would welcome further information with regard how assurances about the security and reasonable comparability of academic output students would be assured by those providers without degree awarding powers, in addition to those with degree awarding powers, including the role of awarding organisations.

Given earlier comments with regards to the varied maturity and capability of governing bodies, we consider there may be risks in further emphasising the governing body role.

While the proposal seeks to assure that standard are set and maintained, and are reasonably comparable, we would welcome further emphasis on improving student outcomes and consideration of cyclical review.

### 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?

Pearson would want consideration of the sector of programme, type of programme / type of assessment.

### 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?

Further detail with regards to 'timely' would be helpful.

### 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?

However we would suggest that this re-testing should take place regularly through the cyclical review process.

### 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

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

Pearson consider that all providers of UK higher education, whether with degree awarding powers or not, whether alternative providers or not, should be subject to a consistent quality assurance process, with independent externality informing quality assurance reviews, and measured against a transparent set of baseline requirements.

### Question 27

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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?

We would welcome further definition of the role of the awarding organisation and the provider where the provider is delivering higher education awards from an awarding organisation – qualifications such as Higher National Certificates and Diplomas.

### Question 28

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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.