

Pearson College London Submission to BIS Inquiry into proposed changes into assessing quality in Higher Education

November 2015

1. About Pearson College London

- 1.1 Pearson College London is an alternative provider of Higher Education delivering programmes validated by Royal Holloway and Bedford New College, Ashridge and the University of Bradford. It has recently also had programmes validated by the University of Kent which will commence delivery in September 2016.

2 Executive Summary

- 2.1 We have some concerns regarding the proposed changes to quality assessment in Higher Education, in particular the proposal to abandon cyclical review.

We welcome the introduction of a TEF and suggest that the factors used to assess teaching quality should be:

- Student Satisfaction
- Distance-travelled
- A measurement aligned to the mission of the particular institution.

We do not consider it advisable to link the TEF to fee level at this stage due to the complexity of assessing excellence and the desirability of ensuring that the system is working as intended before linking it to fees.

3 What issues with quality assessment in Higher Education was the Higher Education Funding Council for England's (HEFCE) Quality Assurance review seeking to address?

Will the proposed changes to the quality assurance process in universities, as outlined by HEFCE in its consultation, improve quality in Higher Education?

- 3.1 In relation to the two questions posed above, we repeat sections of our response to HEFCE's consultation on the Quality Assurance review (slightly amended to make sense in this context):

3.2 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.

We agree with the embedding of externality within internal processes as outlined in the proposals. However, we suggest that, these mechanisms are largely already in place and 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 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.

We also 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.

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

We agree that data should be one of the indicators used to identify institutional performance and signs of concern.

However, we think that institutional QA processes still need to be checked through some sort of regular review. If these processes are not robust and/or there is no testing that they are actually 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.

3.4 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.

Governing bodies already do, and should, play a key role. However we consider independent cyclical review is also necessary for the reasons already given.

We agree 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 be as transparent as external independent review reports.

4 What should be the objectives of a Teaching Excellence Framework?

a) How should a TEF benefit students? Academics? Universities?

b) What are the institutional behaviours a TEF should drive? How can a system be designed to avoid unintended consequences?

c) How should the effectiveness of a TEF be judged?

4.1 If the TEF works well it will benefit students by improving the quality of teaching in universities, by encouraging a diversity of approaches to learning and teaching and by giving students more information about the type and quality of teaching at individual institutions. It will benefit academics by allowing them to prioritise teaching, by creating equal status between teaching and research, and by recognising teaching excellence, which may otherwise go unrewarded in the current context where research is incentivised but teaching is not. It will benefit universities by allowing them to be recognised for excellence and innovation in teaching allowing "teaching universities" to stand on a more equal footing with "research universities".

4.2 Designing an effective system for judging the quality of teaching is complex, however. We repeat a section of our response to the recent Quality Assessment Review, in relation to the need to exercise caution if outcomes data alone is to be used:

"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.

- *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."*

4.3 Therefore, in relation to teaching excellence, we consider that, rather than simply looking at student outcomes data, the following factors should be taken into account:

- Student satisfaction
- Distance travelled
- A measurement aligned with the mission of the institution

4.4 *Student satisfaction*

We consider that students are best-placed to judge the quality of the teaching they receive, whether it has been effective, whether it has engaged them and stimulated their interest, whether it has inspired them to further study and whether they think it has enabled them to achieve their potential.

4.5 *Distance travelled*

We articulated this argument in our response to the Quality Assessment Review, an extract of which is repeated above. Institutions who take students with, for example, high UCAS tariff points, are likely to have high rates of retention, progression and achievement, and, ultimately, be graduates in high-earning employment. These outcomes may have little to do with the quality of the teaching they have received at university, and a focus on such outcomes alone could deter institutions from admitting students with lower prior achievement, many of whom come from lower socio-economic groups. However, if, distance travelled or "value added" were measured instead this would incentivise institutions to increase the proportion of disadvantaged students in HE and would be a better measure of the impact of teaching on the students at that institution.

4.6 *A measurement aligned with the mission of the institution*

It would not be desirable for all students to be taught in exactly the same way, thus denying student choice and the opportunity to innovate. There should therefore be a diversity of measurement, aligned to the mission of the institution. This might, for example, be related to facilities, contact hours, industry engagement, innovation, community engagement or research-led teaching (in which case the link between the research and the teaching must be demonstrated). If we measure teaching in the same way at all universities, we will create the same sort of teaching at all universities instead of an innovative and diverse sector.

5 How should the proposed TEF and new quality assurance regime fit together?

- 5.1 We consider that the TEF could become part of the quality assurance regime but, as indicated elsewhere, a quality assurance regime should also consider matters relating to the wider student experience and not just teaching.

6 What do you think will be the main challenges in implementing a TEF?

- 6.1 Defining teaching excellence, identifying a robust and reliable way of measuring it, working out how to measure distance travelled, creating metrics that encourage diversity and innovation, and resisting the pressure to colonise the TEF with what are really research metrics.

7 How should the proposed connection between fee level and teaching quality be managed?

a) What should be the relationship between the TEF and fee level?

b) What are the benefits or risks of this approach to setting fees?

- 7.1 While the proposal to link fee level and teaching quality is attractive and it makes sense that students should pay for the level of service they are receiving, there are nevertheless a number of challenges and risks associated with this approach:
- Fees would presumably be set at institutional level rather than course level. However, teaching in almost any institution is likely to be variable – should all students at the institution have to pay higher fees even if they are not in the department which has gained the high score?
 - Students who would most benefit from teaching excellence may be those who could least afford (and might be most averse to) a large loan.
 - If a university were to fall out of the category which allowed them to increase fees would fees decrease? If so would current students who have paid eg a year of the higher fee demand a refund?
 - Given the complexity of measuring teaching excellence, we suggest it is dangerous to link to fees at this stage until the government and the sector are sure that the mechanisms used to measure teaching excellence are reliable and robust and any unintended consequences have been identified and addressed.
 - If the system was binary, ie universities either receive a “score” which allows them to raise fees or they do not, this could lead to a perception that those who did not had “failed”. This could be damaging to the reputation of HE and seriously undermine students’ confidence in their institution.
 - A better reward might be a grant of some sort to be spent on a teaching related project rather than an increase in fees.