Royal Society of Chemistry response

Our response to the HEFCE Quality Assessment Review for Future approaches to quality assessment in England, Wales and Northern Ireland

Question 1

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

Strongly agree.

Autonomy of providers is essential in the HE sector. Having cloned providers would be detrimental to the student learning and experience. The current system of QA is not bad as it stands. All mechanisms complement each other and do not compete. They all look at different aspects of the university/department/course. These mechanisms in turn allow the aforementioned autonomy which is a strength of UK HE.

Question 2

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.

Strongly agree.

We broadly agree with the underlying aim here. However, some thought needs to be given into how this external scrutiny coordinates with the proposed TEF. There is some concern that the change to this QA system along with the introduction of the TEF will be too much to handle at one time. Has any thought been put into if this will be the case? Equally, what is the consequence of a good or bad result?

Accreditation by independent bodies such as professional bodies is essential to quality in specific HE courses. In the example of the Royal Society of Chemistry which looks at each course on its individual merit no other mechanism does this to the same extent and broadness. Professional body recognition reassures current and prospective students in a way other QA mechanisms do not. Primarily down to our independent nature and ability for our membership (industry and academia) to provide guidance. Professional body accreditation is usually fundamentally linked to Chartered Status.

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?

Neither agree nor disagree. No comment needed.

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?

Agree.

This is essential to ensure HEI's provide a quality education and equally important a quality student experience. In Science subjects it is essential this experience includes practical learning.

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?

Neither agree nor disagree.

We feel this is an ambiguous statement. There needs to be a clear definition of baseline requirements and material evidence before this could be implemented. Until this is outlined it is impossible to answer this question.

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?

Neither agree nor disagree.

For the same reasons outlined in question 5 it is impossible to answer this without more context and definition.

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?

Agree.

Although there is some ambiguity in the terms academic experience and student outcomes we do broadly agree with these statements. In particular 41e and getting more input from industry and future employers. As a professional body we welcome input into how this happens. Referring to paragraph 41f it will be very hard to have joined up accreditation activities between professional bodies. Each professional body handles the fundamentals of subject matter differently.

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

Agree.

Ensuring the student voice is heard is essential in the future. However, this voice needs to be balanced against all other QA mechanisms. Equally how this student voice is gathered will be important to ensure fair representation across the student body.

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?

Neither agree nor disagree.

Ensuring the student voice is heard is essential in the future. However, this voice needs to be balanced against all other QA mechanisms. For example the NSS has its uses but it could not be used solely for QA.

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?

Agree.

No comment needed.

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.

Neither agree nor disagree. No comment needed.

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?

Neither agree nor disagree.

We cannot comment on this without further context being added and what the HAR would look like in practice.

Question 13

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

Agree.

No comment needed.

Question 14

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

Neither agree nor disagree.

While it is clear that one would expect a different level of scrutiny for new providers, established providers and those in transition, it is not clear how the latter group is defined and how transitions between the groups will happen. Without this, it is impossible to answer the question in any meaningful manner.

Question 15

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

Strongly agree.

With the increase in transnational degrees some form of QA on this system should be mandatory. Universities entering into such partnerships should ensure the quality of any prior learning. This should be done on a formal basis. All programmes which graduate students from a UK HEI should have some form of external scrutiny to maintain standards.

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?

Agree.

We broadly agree with the statements in this section. It is important that paragraph 81 is maintained throughout this process. Independence of HEI's is a key benefit to the UK HE system.

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?

Strongly agree.

We strongly agree with these statements. External examiners do need training to ensure consistency. In addition guidance to external examining should be developed i.e. some subjects are far too broad for 1 external examiner. However, implementation needs to be done with caution. If the system becomes too onerous you will find a decrease in external examiners for what is a relatively low paid activity in certain topics.

A register is a good idea and it should be maintained by independent bodies such as professional bodies. We would welcome being involved and working with you in this process.

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?

Neither agree nor disagree.

This is an ambiguous statement. It seems like the proposal is for external examining to play a greater part in overall QA. External examining is fundamental but has its limitations. It certainly does not look at all aspects of a department or even an individual programme.

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?

Strongly disagree.

We feel the underlying statement here will be very hard to implement. Different subjects vary greatly so calibration will be very difficult. Also assessment parameters differ so greatly as to make this unachievable. In addition the statements only mention marking standards. The setting of exams and assessment is equally important.

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?

Neither agree nor disagree.

This question is also ambiguous so impossible to give a direct answer. PSRB accreditation is vital to the QA of degree programmes. However, it is impossible to get an overarching common process. Subject areas vary greatly. You then have regulated and unregulated professions to consider. The ambiguity of this question will mislead people.

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?

Neither agree nor disagree.

This question has many facets. Yes the governing body should have more emphasis. However, we disagree with paragraph 96 bullet points 5 & 6. Those statements are very hard targets and take some independence away from HEI's.

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?

Neither agree nor disagree.

We broadly agree with this statement. However, the evidence is anecdotal in our opinion. The 2(i)/2(ii) system is well embedded across the sector. Therefore, it will take considerable effort to change this. Probably the reason why there has been a low uptake on GPA. It is also worth pointing out the

existing cliff edge did not exist when a viva system was widely used amongst institutions. Over the last 5–10 years this system has ceased for whatever reason. Reimplementation at institutions that keep the honours system is a possible way forward.

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?

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?

Both agree.

No comment needed.

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?

Strongly agree.

No comment needed.

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?

Many of the questions you have asked are ambiguous and too broad to give a direct answer to. In essence we agree with parts of the questions but disagree with others. It is acknowledged the consultancy is founded on good principles. However, fundamentally it is going to be almost impossible for you to implement some of your targets. Specifically to set algorithms across topics will not be achievable. Due to the very nature of subject areas and independence of universities being able to say a grade from university A is the same as the same grade in a different subject from university B is going to be virtually impossible to implement. Also public perception of differing universities and there historical significance is unlikely to change.

However, some suggestions are good. The training of external examiners and a register of said examiners is well founded. This would be welcomed and we would be willing to help it this development. One word of caution: in broad subjects it is essential to have more than one examiner per degree programme. Guidance around this area would also be appreciated by the sector. If the areas suggested on external examining is done correctly and thoroughly this should play a major part in consistency overall.

PSRB accreditation is essential to QA. This mechanism is independent and unbiased, and importantly this is recognised by students and the wider academic community. It takes into account other QA aspects. However, trying to collate into a common process will be virtually impossible. Subject areas are too varied to be able to do this and professional bodies have differing commitments to this area. Essentially most PSRB's accredit to grant academic requirements to Chartered status. Due to the varied nature of the professional recognition creating a synergistic system across PSRB's will be very hard. I highlight this is not from unwillingness on the part of PSRB's. Moreover it is a statement of realism.

As per the round table sessions undertaken earlier in 2015 the current QA mechanisms QAA/External examiners and PSRB accreditation etc complement each other. Improving rather than overhauling the existing system to ensure student experience and quality as a whole would achieve the same impact.

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?

There is very little mention of employability data following courses. It is acknowledged this data is collected via HESA to a certain extent. However, this could be done in a more in depth process. Potential students/parents will always look at end results/employability when looking for courses/universities. Collecting more information and evidence on this area will in turn drive up quality. In essence getting a certain degree whatever the classification or reputation of the university will not guarantee employability. Likewise there is very little mention of getting employer feedback into the QA system as a whole. More thought on this area would provide a more robust system. Most universities have some kind of

industry advisory board. More clarity is needed on how this is used for curriculum development. There could be a role for professional bodies to facilitate employer engagement, and we welcome input.

Overall more information is needed on how you will implement any of what you suggest.

More thought needs to be put into the area of transnational degrees. QA of these degree schemes is needed and not simply looking at the years spent in the UK. If a student graduates with a UK degree it is essential QA is done on the whole degree. This needs to be enforced and maintained. If this does not happen the overall impact will be detrimental to the UK HE system. Again the thought is there but implementation is unclear.

Overall we are broadly supportive of the proposals. They are very challenging and we welcome being involved as they move forward.