

# QAA Consultation on Degree Classification: Transparent, consistent and fair academic standards – BU response Feb 2019

**1. Does the adoption of a UK sector-wide statement of intent represent an effective approach to meeting the challenges outlined in the report?**

- a. Yes
- b. No
- c. In part

**Please explain your response.**

In Part

The individual components identified for review are helpful in reconfirming the appropriateness of existing conventions for quality assurance. It is not yet clear whether the statement would be directly connected to the standards expectations in the UK Quality Code or would create a need to revise the core practices. The core practices may require an additional level of specificity dependent on the outcomes of the underpinning reviews that are to be taken forward in support of the statement.

As the worked-up statement is not shared within the consultation document it is not possible to say at this stage if it will be a fully effective response to the concerns expressed by the OfS and UKSCQA. A vital aspect of the statement will be communicating the rigour of existing assessment practices to the public at large. There are potential challenges in delivering this message effectively. As institutions are operating with autonomy in areas relating to assessment, standards and quality assurance the statement will also need to be clear whether tailoring is expected at the institutional level or if it is to be universally applied across all providers.

The Universities UK commissioned analysis rightly recognises the vast range of factors that influence student outcomes. It is possible that perceived grade inflation is actually the result of improved performance by students given the focus on improvements in education, student experience and student outcomes across the sector. Given the range of input factors it is entirely possible that aggregated degree outcomes will continue to improve even if all of the suggestions within the statement of intent were actioned. The statement should recognise this.

**2. What other approaches could be explored to address the issues at a UK sector-wide level?**

We feel the issue is partly one of communication and public understanding. Improvements in degree outcomes are set within the context of greater public debate about the value of higher education and its contribution to individual students and wider society.

We have a strongly performing higher education sector which is maximising its resources and driving up quality of provision. Improved teaching quality and a greater emphasis in the individual needs of students have been incentivised through the evolution of sector and institutional policy as well as the improved understanding of evidence. Student outcomes are improving as a result of this, and of their own motivation and commitment, in part as a result of the focus on value for money and graduate salaries. Therefore we suggest the sector works collectively to improve general levels of understanding as to how universities operate their processes for assuring standards so that they become as well-known as those in operation for the schools sector. The statement of intent could be an initial step towards this aim, as would be the evolving role of the UKSCQA and QAA.

We accept and support the principle in the consultation document that criterion-referenced assessment and classification offers a good measure of student attainment. This is embedded within sector approaches to assessment and is important in ensuring that a student's individual achievement is fairly recognised. Any statement seeking to communicate how standards are maintained should explain this clearly.

**3. What do you consider a reasonable period for a provider to review its practices and enact appropriate changes?**

This is a difficult question to answer without further details regarding the final scope of the statement of intent. As noted in the consultation document, consumer protection requirements are important. We would usually expect that important changes should be introduced so as to apply to new students only and not existing students. There may also be a need to change regulations and internal systems.

It would also be helpful to have specific advice and guidance on the principles that will guide such a review to ensure consistency of approach otherwise it may become an insular exercise and have no bearing on sector wide issues.

**4. How can the statement of intent be taken forward by the different national higher education systems of England, Wales, Scotland and Northern Ireland within their national quality and regulatory frameworks?**

The primary areas referred for review as part of the statement of intent are largely common to institutions in all four nations of the UK. A common reference point is the UK Quality Code and integrating the outcomes from the programme of work into the Quality Code would seem a natural first step to ensuring alignment.

**5. Are the evidence areas proposed at Table A for inclusion within a 'degree outcomes statement' appropriate for supporting an institution to identify potential 'grade inflation' risks and provide assurance to maintain public confidence?**

- a. Yes
- b. No
- c. In part

**Please explain your response.**

Yes

The evidence requested as part of a degree outcomes statement is largely already available in the public domain. In determining the agreed approach we must be mindful of the risk of unnecessary duplication and take opportunities to simplify where possible to ensure that the primary needs for public information are met. It is important to reference other requirements relating to transparency and regulation more generally, such as Access and Participation Plans, Student Protection Plans and other routine data publications. The data informing the quantitative review between degree outcomes and other factors would need to be carefully compiled using agreed conventions to ensure transparency and comparability between providers.

Much of the information referenced within the Academic Governance category is already considered within academic and corporate governance structures as advised within the CUC Code of Practice.

The added value to holding this material in a single place is the potential of providing public facing material presented simply for the purposes of transparency. We would not be in favour of the degree outcomes statement becoming overly complex and losing its impact as an important communication tool.

**6. Do you consider there to be merit in gaining assurance from an 'external advisor on academic standards'?**

- a. Yes (please explain your response)
- b. No (please set out any other mechanisms for enhancing external assurance)

No

We see this proposal as duplicative and unnecessary. The function of the 'external advisor on academic standards' is already performed through governance functions, notably at governor level. Following the introduction of HEFCE's Revised Approach to Quality Assessment University Boards/Councils have evolved to include experienced academic representatives as part of their oversight of academic standards and quality. This evolution has continued during the introduction of the current regulatory regime.

**7. What are the:**

**a. opportunities and/or**

**b. challenges**

**associated with including the commitments to strengthening the external examiner system in the statement of intent?**

The External Examiner system has been reviewed a number of times without leading to fundamental changes, a result of the inherent value of the approach in advising programme teams and ensuring comparability between institutions. There are opportunities to revisit proposals made in these previous reviews to establish if they would contribute to the challenges outlined in the consultation. For example in the Higher Education Academy's 2015 review of the External Examining system taken forward on behalf of the UK funding bodies a recommendation was made to enhance the subject specific calibration of standards through the establishment of disciplinary communities of practice. This proposal would require central co-ordination and investment but would complement existing guidance and reference points for Examiners as they carry out their duties.

There is an opportunity to restate the expectations regarding External Examiner training. One area that needs clarification is whether the institution employing the Examiner offers training or whether that is the reserve of the institution that has employed the Examiner. We would endorse the latter approach as Examiner training bespoke to the institution is important for orientating new appointees with the specific context in which they are being expected to operate. All academic staff within their home institutions would be expected to receive training in support of the mechanisms for establishing and assuring standards through quality processes such as programme approval and review and assessment design. This includes references to core concepts relevant to external examining including subject benchmarks, the credit framework and generic assessment criteria.

**8. What are the:**

**a. opportunities and/or**

**b. challenges**

**associated with enhancing components of the UKPSF relating to external examiners?**

Recognising External Examining within the UKPSF is a good opportunity to recognise the contribution and value of colleagues who agree to take the role at other institutions. As External Examining does not feature in the UKPSF at the moment it would signal the importance of External Examining as well as encourage institutions to support colleagues wishing to act as Externals.

**9. What are the barriers to implementing the recommendations in 'Understanding degree algorithms', particularly the publication and explanation of degree algorithm practices?**

Academic regulations are routinely published and shared with students. Providing a digest of the specific choices an institution has made would be relatively straightforward. When regulatory changes are made there is significant discussion taken through appropriate governance structures. However, greater transparency and comparison with sector norms would help prevent incremental changes from occurring without appropriate scrutiny or consideration of potential unforeseens.

The primary challenge here is ensuring that institutional autonomy is respected such that individual institutions continue to be allowed to manage their own regulations so that these can reflect the mission and context of that provider. For example, PSRB requirements heavily influence regulatory matters in some areas of study and these differences are for acceptable reasons including public safety considerations and supporting assessment of practical skills. ..

There is also a range of terminologies used within regulations which makes comparing the language difficult for students and other non-technical specialists. This can easily cause confusion for those working across several contexts, including students that have transferred or staff acting as External Examiners. We would recommend the development of a common glossary with easily understood definitions that serves as a reference point for students and staff.

**10. Should the statement of intent contain a provider's explanations of:**

**a. weighting of marks? Yes/No**

**b. 'zones of consideration'? Yes/No**

**c. 'discounting' low performing modules? Yes/No**

**d. PSRB influences on algorithm design? Yes/No**

**Please explain your responses.**

Yes to all

Transparency in each of these areas would be beneficial provided the details are given in an understandable way. It may lead to greater alignment of regulations with reference to each other. .

It is also important to note that approaches to borderlines are informed by recognition that small differences in weighted average around classification cliff edges are not necessarily statistically significant. This is a major challenge to the Honours Degree Classification system generally. Our data reveals that the current classification system significantly exaggerates the BME attainment gap when proportion of good honours is compared with weighted average. A gradual erosion of the ability to consider cases at these cliff edges risks an overly mechanistic approach that might not align with any accepted classification description.

**11. Does the proposed classification description in Annex A provide an appropriate reference point for degree classification practice?**

**a. Yes**

**b. No**

**Please explain your response.**

No

The classification description provides a reductionist understanding of the differences between award levels and will do little to enhance public understanding of what a specific degree represents in terms of achievement. This proposal also exacerbates the cliff edge effect between awards where a student with a small difference in average mark is regarded as having a qualitatively different level of ability when compared to someone with a slightly higher average (perhaps as little as 0.1%) across 30+ points of assessment.

Our University already has generic assessment criteria which offer a greater level of disaggregation within mark boundaries and between academic levels.

**12. Do you have any proposals for substantive changes to the classification criteria? Please explain your response.**

We do not believe the classification criteria add sufficient value and would recommend that this proposal is not taken forward.

In addition to the concerns shared in the response to Q11, classification criteria would also be required for other levels of programme (sub-degree and Masters) in order to enable all students graduating from taught programmes to be able to demonstrate their achievements.

**13. Do you agree that the proposed classification description should be incorporated into national quality assurance and regulatory frameworks, as is appropriate for different national contexts? In England, this would mean the use of the proposed classification description as 'sector-recognised standards' as defined in section 13(3) of HERA.**

No

As suggested in our response to Q11, we do not feel the classification description offers a helpful summary of student achievement and standards. There is potentially merit in developing more nuanced descriptions when the sector revisits subject benchmark statements. The standard of the qualification combines understanding of the general expectations for awards as represented by the Framework for Higher Education Qualifications with the disciplinary specific elements represented by Subject Benchmark Statements, PSRB requirements or Apprenticeship Standards.

**14. How should the proposed classification description be incorporated into:  
a. institutional practice  
b. other relevant documents or frameworks?**

As stated above we do not believe the classification description is a helpful addition to the frameworks for quality and standards.

The classification description is a simplified version of existing institutional practice. For example, we have generic assessment criteria published to inform our assessment practices. Any agreed statement at the sector level would feature within this institutional framework.

**15. What are the:  
a. benefits  
b. challenges, and/or  
c. national considerations  
of using a shared sector metric to inform institutional self-assessment of degree classifications over time?**

- a. Such a metric could only ever be indicative but there may be benefits to having a means to perform self-assessment versus an expected threshold given other similar input variables. Care would need to be taken to contextualise the data appropriately to recognise the variety of factors that may affect the metric over time.
- b. However we have concerns about the use of a blunt metric that makes a direct comparison without reference to background variables and subject mix. It is unlikely that tool would account for all factors and weight accordingly to give an accurate picture. The understanding of the metrics must take into account the possibility that increases in student performance can result from qualitative improvements to teaching and the student experience. Our concern is that any metric could be misinterpreted or prove misleading without a full understanding of the context.
- c. There would need to be a careful consideration of how this is presented, so that it does not distort institutional responses. Is there a presumption about what a 'perfect' alignment with the metric would look like?

**16. How should a sector metric for degree classifications over time be defined?**

As mentioned above this should include background variables and attributes that could conceivably affect the outcome of the individual students. Many of these are available within HESA returns and include demographic factors, educational experience as well as the subject of study. Due consideration should also be given to widening participation indicators.

**17. How can sector reference points be better used, with more consistency, by external examiners to support institutions to protect the value of qualifications over time?**

External reference points are genuinely embedded within the standard practices for quality assurance. It is routine for External Examiners to reference subject specific reference points as part of their work, notably subject benchmark statements and PSRB requirements. Comparable data at subject level would complement these qualitative reference points.

In order to realise the potential of External Examiners to engage more thoroughly with sector reference points the data available needs to be robust at subject and programme level. This is a difficult proposition as small numbers tend to reveal differences that cannot be regarded as statistically significant. Options to respond to this include aggregating data between years and providing longer term trend information.

**18. Should the sector explore the steps that could be taken to remove, or reduce the impact of, the inclusion of upper degrees (1st and 2.1 awards) in algorithms used to rank university performance?**

**a. Yes**

**b. No**

**Please explain your response.**

Yes

From our institutional perspective we challenge the premise of the question. League table considerations do not influence our academic policies or approaches to assuring quality and standards.

Although we understand the intention to eliminate any potential for distortion, we doubt the ability of the sector to limit press freedom when the press uses datasets that are widely available.

Making available simple but robust metrics on student outcomes could potentially provide more helpful data on the performance of institutions relative to the expected level. We note that the Learning Gain project has transferred from HEFCE to the OfS and look forward to seeing whether this body of work leads to a meaningful way of encapsulating this complex concept.

As indicated in our answer below we should also be revisiting the more fundamental question as to whether the Honours Degree Classification system still represents effective practice for recording student academic achievement. We understand that this would be a major reform but we see potential benefits in terms of removing the 'cliff-edge' regulatory considerations and encouraging student engagement with their studies. Our data also shows that the BME attainment gap is exaggerated by the cliff-edge between 2.i and 2.ii classification boundaries.

**19. What should be the parameters and remit for a UK-wide task and finish group on the long-term sustainability of the UK's degree classification systems?**

The remit for a task and finish group could include:

- Consolidate previous explorations of the viability of the current system e.g. Burgess reports
- Considering the long term future of the Honours Degree Classification system as the primary method of recording student achievement
- Considering the viability of alternatives approaches to recording student achievement for implementation across the sector e.g. Grade Point Averages
- Reviewing the specific needs of employers in terms of differentiating between student knowledge and achievements

**20. Which of the following options for reforming or enhancing the degree classification system should be considered in more detail? (Please indicate Yes/No)**

<b>Reform option</b>	<b>Yes/No</b>
<b>Introduction of new upper award - for example, a starred first</b>	Yes
<b>Introduction of a 'cohort ranking' - for example, providing additional information on graduates' position in the grade distribution</b>	No

<b>Resetting the classification boundaries - for example, moving up by 10 marks so 80 = 1st and so on</b>	No
<b>More regular review of Subject Benchmark Statements to keep pace with improvements in teaching and learning</b>	Yes
<b>Universal HEAR format</b>	Yes
<b>Other (please explain)</b>	
<b>No reform required</b>	
<b>21. Do you have any other comments on the proposals that have not been specifically asked in this consultation?</b>	