IOP Institute of Physics

Review of Quality Assessment

Institute of Physics response to a HEFCE consultation

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15 September 2015

Question 1: Do you agree with our proposed principles to underpin the future approach to quality assessment in established providers?

Agree

In general, we agree that the principles proposed (para. 30a – k) provide the basis for a positive approach to future quality assessment, and are in many ways a reflection of how current good practice is understood.

However, we have strong concerns over the language used in para. 30l which suggests the assessment system should "[w]ork towards creating a consistent approach to quality assessment for all providers of higher education". This principle seems to suggest a 'one size fits all approach', but this is neither workable nor desirable. This is also inconsistent with paras. 35 – 36 which indicate that a rejection of 'one size fits all' was the "strongest and most consistent message … that came through the discussion period".

In addition, the language used in a number of the principles is unnecessarily vague and as such some principles may be open to interpretation. The true test of the principles will be in how they are administered. As such it would be beneficial at this stage to spell out just what is meant by phrases such as "academic standards" (30a), "value for money" (30d) or "easily understood" (30e), or the processes by which these will come to be defined.

Question 2: Do you agree that our current proposals for the use of meaningful external scrutiny as set out on pages 9-10 are sufficient? If you do not agree, please indicate what additional or different external scrutiny you propose and provide the reasons for this.

Neither agree nor disagree

These proposals cover a wide range of areas, but it is hard to judge their sufficiency without having more clarity on specific details - in particular, 'calibration' of degree standards can be interpreted in different ways.

There is a clear role for PSRBs identified, and one that is welcome. We would suggest that increasing the influence of professional bodies' role as accreditors is vital for effective subject-level scrutiny to work. PSRB's accreditation at subject level should reduce the need for additional oversight from the university and avoid unnecessary duplication but currently this rarely happens. In addition, there would be an obvious role with the proposed register and training of external examiners, as "external sector bod[ies]". External examination entails much subject-specific understanding; this knowledge can be best provided by PSRBs working to complement more general training. We also agree to some extent with efforts towards "the calibration of degree standards and the consistency of degree classification algorithms – led by the sector but operationalised through external peer review and with relevant PSRBs". However, this should certainly avoid a 'one size fits all approach', which para. 35 suggests is not welcomed. PSRBs will also not be able to calibrate the difference between a 2(i) and 2(ii). PSRBs would only be able to calibrate at a threshold level, as is currently the case i.e. the broader range of standards within a classification, rather than defining the boundaries between them. Departments do different things, and set out to achieve different things, even within a single subject. As such, there would be no way to effectively define a 2(i) /2(ii) standard.

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?

Strongly agree

We strongly agree that a 'one size fits all' approach is no longer an achievable goal in quality assessment as it never has been. Removing the 'one size fits all' cyclical reviews is welcome as this should reduce the time and effort that goes into showing compliance through the generation of vast amounts of paperwork that has little impact on the actual quality of teaching and learning. There has always been such diversity between subjects and within subjects that such an approach could not be effective. In physics alone there is huge variation in the kind of material which is being taught in each department, above and beyond our *Core of Physics* [http://www.iop.org/education/higher_education/accreditation/file_64166.pdf], such that it would be very difficult to assess a department without first knowing what it was setting out to achieve. The same is likely to be true of almost all subjects, from history to sport science. However, it must be the case that any future approach ensures that individual departments are able to be effectively held to public scrutiny, and any problems identified within the departments are highlighted.

While accepting that a 'one size fits all' approach is not appropriate, a future quality assessment system needs to attempt to ensure that all students receive the same opportunity for a positive and high quality academic experience. However, this assessment needs to be about ensuring that the university or department is achieving what it sets out to do through their degree programmes, not directly comparing them against other departments which may have different aims and objectives. This may include ensuring that each department sets out what it intends to achieve, and then demonstrates how it is going about achieving it. There is a possible role for PSRBs here to support assessment, as they will often be best placed to understand and assess the specific aims and objectives of departments within their discipline. This may help in efforts to ensure that the principle to "[b]e transparent and easily understood by students and other stakeholders" (30e) is met.

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

Publishing a baseline requirement could be useful, but it can only be done in a way that takes into account subject specific differences. For example, there is a great deal of difference between subjects in departments with low numbers of contact hours and more laboratory-based subjects such as physics. A baseline would need to be set which could meaningfully take account of these differences; this may require setting a baseline for each subject, taking into account variation even within each subject. This would also ensure that it is consistent with the principles of autonomy and proportionality outlined in 30a, 30f, 30h, 30i, and in paras. 35 and 36.

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?
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

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?

Neither agree nor disagree

With regards to "student outcomes", it is unclear what this means in practice. Existing metrics do not appear to be appropriate. The National Student Survey (NSS), for example, suffers from too many flaws – being based as it is on a short term and narrow view of the university experience which does not make for effective comparisons.

A focus on outcomes can, and does, drive behaviour towards improving the measures without demonstrable benefits in improving the actual student experience. There is also an absence of reliable graduate employment statistics, as these are often incomplete and no existing system is effective in surveying the different outcomes of different subjects. In particular, in physics many students, around 40% of graduates, including many of the best performing students, will go on to doctoral study. As such, surveys such as Destinations of Leavers from Higher Education (DLHE) are limited: even three years after graduation, many physics graduates will not be in employment but further study. If employability is used as a metric, then it is also important to understand what a university is trying to achieve. Some universities, for example, specialise in offering degrees to students already in employment. In this case, employability would be redundant as a measure of outcomes.

Judging outcomes, including employment status, without first having an idea of the level of inputs would also be very limited. Without knowing the level at which students are at before they enter an institution, as well as their prior educational and social background, it is hard to ascertain the extent of a university's impact.

With regards to para. 41f, this could imply a coordination of external accreditation and internal reviews. We do not think this is possible as it would mean, amongst other things, all the accredited bodies working to the same timescale, which would not be possible in practice. PSRB accreditation reports should be considered as part of internal review, but it will be impracticable to make them contiguous. 'Subsumes' could also be taken to mean that the activities of PSRBs could become part of a larger internal review and that they would lose their independent activity entirely; the IOP would not support this if that were the intention. The focus should be on utilising the subject knowledge and expertise of the PSRBs to reduce unnecessary duplication of effort for departments undergoing both PSRB accreditation and university review. Where PSRB accreditation exists it should be used to reduce the QA burden from the university on the department concerned.

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

Neither agree nor disagree

As above, the answer to this question depends entirely on what is meant by "student outcomes data". The existing measures that could be used are very limited. Before any decision is made on the role that student outcomes data plays in providing the basis for continuous improvement activities, specifically what is meant by student outcomes data needs to be provided, and a robust justification given for the measures used.

One possible approach would be to assess "value added" and the skills and abilities of students on graduation, but this would require an assessment of students entering each institution. Not only would such assessment entail additional high costs, but it would also have to happen at the national level to be effectively comparable. Such a national test, even in a relatively homogeneous subject such as physics, would be implausible.

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?

Agree

Whilst an exploration of further use of student outcomes data would be useful, this is again dependent on which data is going to be used to assess student outcomes and its reliability. To be useful, and valid, any further work will need to address concerns over the limitations of the data currently available.

The following question is directed at respondents from Northern Ireland.

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?
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.
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 on page 20?
Question 13: For Northern Ireland, do you agree that DEL should develop and use the existing accountability mechanisms in the ways described on pages 20-21?
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

Question 15: Do you agree that international activities should be included in the remit of future quality assessment arrangements as described on pages 22-23?

Neither agree nor disagree

It would certainly make sense to include the international activities of UK HE institutions in the remit of any future quality assessment arrangements, particularly the operations of satellite campuses. As well as the potential for poor student experience at these campuses, there is a potential negative effect on the international reputation of the whole of UK HE from poor practice overseas. However, it is difficult to imagine how practical the effective administration of such an exercise could be. Given that there are challenges in effective quality assessment in UK-based institutions, the added international dimension would make doing this in any meaningful way very difficult.

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

Para. 79 acknowledges that the current system is unable to provide effective comparisons between and across subjects – "[t]he picture that has emerged is one where, broadly, those within the sector are rather comfortable with current approaches, whereas the research evidence provides a more sceptical view of the current arrangements for assuring the comparability of academic output standards, both in individual providers and across the system as a whole." However, it is unclear how national comparisons will be able to be made effectively without a common curriculum and a common assessment, neither of which are either desirable or plausible. Even with our '*Core of Physics'* there is huge variety in physics programmes and we believe this variety is to be both welcomed and celebrated. The different focus and content of degree programmes provides students with the opportunity to choose a degree within their discipline that is tailored to their interests. This diversity both between and within subjects makes assuring comparability of output standards problematic. We do agree however that there should at least be assurances given to students on the maintenance of academic output standards in their institution and across their discipline, including a statement of minimum standards at the subject level which could be the basis for overall standards.

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?

Agree

A register of external examiners might be a useful initiative but it should be linked to the relevant PSRB, where such an organisation exists. If accreditation is meant to be a greater part of the process then it also makes sense for the same body to be involved with the training of external examiners as well, where possible. Any system of registration, and training, must avoid unnecessary bureaucracy and any other barriers, particularly on workload, that would provide disincentives for those currently operating as examiners to continue. We welcome the acknowledgement of this is para. 87.

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?

Disagree

The proposals may be beneficial to improve the external examiner system as a whole, if they work alongside PSRBs, but they will not be sufficient in and of themselves to provide assurances that standards are 'reasonably comparable'. The role of an external examiner is to ensure that standards at the university in that discipline are broadly appropriate and that assessment rules are applied correctly. While external examiners have a valuable role, the expectation that they can assure comparability of output standards is unrealistic as issues of comparability go beyond individual external examiners. As such, the potential to generate the risks noted in para. 87, of putting off well-qualified external examiners, as well as risking the "critical friend" relationship currently played by external examiners in favour of a more formal and combative relationship, are not justified by the proposals as they are insufficient to achieve their stated aim in the first place.

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?

Agree

Although a successful calibration of academic outcome standards would be welcome, particularly to employers, it would be a considerable challenge to achieve within a discipline and considerably more difficult across disciplines. If such an attempt were to be made, PSRBs would have to be involved, but it is unlikely that they would be able define the difference between a 2(i) and a 2(ii). There is a huge variation in the curriculum content in different departments and degree programmes as they are designed to achieve different outcomes. In physics for example, some might be very mathematical while others very applied – neither is better than the other but it would be very difficult indeed to define a common standard beyond the threshold. Achieving a common standard at the 2(i)/2(ii) standard would likely require a reduction in the variety in programmes which would conflict with principle (a) in para. 30.

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?

Agree

Providers should certainly consider the accreditation activities of PSRBs centrally within their internal approaches to quality assessment, and many do. As acknowledged, PSRBs differ in their approach so it is necessary for the university to decide how best to use the guidance and accreditation activity from PSRBs in order to maintain cross-discipline consistency. However, where robust PSRB accreditation exists, such as in physics, a department that has successfully been accredited should not need to be subject to excessive university oversight at the discipline level. This would reduce unnecessary bureaucracy and duplication of activity for an accredited department. The approach should be decided on a subject-level and not be standardised for all subjects as it would depend on the extent of existing PSRB accreditation for that subject.

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?

Disagree

We agree that the each awarding body should demonstrate engagement with academic standards, however, in most universities academic quality rests with the senate rather than the governing body, and as such it is the senate that should receive more emphasis. It is also not clear that the measures listed in para. 96, worded as vaguely as they are, will in themselves allow a university to state its output standards are 'reasonably comparable'.

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?

Agree

The development of such guidance would be welcome, as there is considerable variation in practice, but it is unclear how this could be successfully achieved.

Any guidance must take account of the different marking conventions between the sciences and arts and humanities in order to be fair to students of all subjects. In mathematical and science subjects there is usually a wider range of marks, often from 0-100, whereas the arts and humanities generally do not tend to use the full mark scale.

If output standards are to be truly comparable then the issues surrounding assessment regulations and degree classification rules that can be designed to inflate grades must be addressed. Providing guidance in this area would be a good start.

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?
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?
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?
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?
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?

Neither agree nor disagree