UKSCQA: Degree Classification Transparent, Consistent and Fair Academic Standards – Response from Independent Higher Education
February 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. b. No

    c. In part

Please explain your response.

If the statement is to have an effective roll out across the sector, it must first recognise the diversity of the sector itself. While a number of independent providers do have their own degree awarding powers, and more are in the process of seeking them, the large majority of them (comprising the fastest growing part of the HE sector) still deliver validated or franchised provision in partnership with a university. Understanding the complexities of degree classifications in these providers must be integral to the statement of intent to futureproof it to meet this challenge. Challenges to degree classifications and how they are designed go further than just addressing the 'degree inflation problem' but rather a lack of understanding of how many providers offer degrees. Our members would be supportive of a statement of intent which recognised the diversity of providers and modes of delivery of undergraduate degrees.

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

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

A single fixed time frame for the whole sector would not be conducive to effective change. The ability to review and make any changes depends on the resource that an individual provider is able to apply to the process and complexity involved. Some of our members would be able to adapt quickly to implement any new changes due to the small size and specialist nature of their provision. If they have greater control over their own quality assurance, marking and the creation of degree classification algorithms then they will have greater capability to review and enact these processes. On the other hand, some of our other members have limited control over academic quality issues including degree classifications as this is carried out by the degree awarding provider in validated and franchised provision partnerships. These providers would need to seek changes from their

own academic and provider level governance bodies, as well as the governance bodies of the degree awarding institution. We would welcome the opportunity to partner with the UK standing committee to explore how these issues might be different in collaborative partnerships and develop guidance to support all higher education providers who are part of these partnerships.

Providers and members who are about to or have just joined the sector would also need additional time to have appropriate levels of data to assess whether grade inflation was taking place as a result of their chosen algorithms. Time would also be needed to make such that any changes that were made were compliant and articulated to students in line with CMA regulations.

We would advocate for either a phased approach within the sector or a longer time period to make sure all appropriate procedures were followed.

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?

   We would welcome the extension of the statement to the different higher education systems of the UK. Many of our members who teach in Scotland, Wales and Northern Ireland face the additional challenges of adhering to different regulatory systems. Independent providers are generally not included in reciprocal designation arrangements for student loans and as such must apply separately to each devolved administration. This then requires them to follow different and conflicting regulatory systems to ensure students of that nation can access loans to study at their institution. Others teach in one nation but are in a collaborative partnership with a university in another. Consistent approaches to issues such as these are important to support these partnerships and the institutions teaching in the devolved nations.

   We would also welcome the opportunity to work with the national higher education quality bodies to develop nation-specific guidance on delivering teaching in partnerships and degree classifications.

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.

The areas proposed would be appropriate evidence areas for potentially identifying grade inflation. However, the criteria in each of the categories have different impact on a provider's ability to tackle grade inflation depending on their control of that area or their ability to provide evidence. It is essential to acknowledge the position of validated providers who must go through both internal academic governance procedures and those of the degree

awarding provider, which could lengthen the process and limit their ability to make appropriate changes.

The reliance upon student data in relation to student characteristics and equalities assessments may hinder small providers who do not meet appropriate thresholds to publish the data. Some IHE members return so few students that the information is not publishable. Furthermore, in such cases the data may often not be representative of the overall student bodies at these institutions. Due to the unique delivery models of many of our members, the data often excludes more students than it includes. When this data, in an effort to be comparable, excludes a large proportion of those studying at an institution, it becomes misleading to students and stakeholders.

Many of our members do not set the degree algorithms of the programmes they deliver so the criteria may not be met or the activity to tackle this may be limited. Marking practices are usually the responsibility of the teaching provider, but there is variability in how much input they have into the choice of external examiners. Whilst we support the adoption of the areas proposed the diversity of the sector must be considered. Guidance specifically designed for collaborative partnerships would be welcome and IHE will support any work in this area.

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)

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?

Our members value the important role that external examiners play in assuring academic standards. Due to the specialist nature of many of our members' subject areas it is all more important to have external examiners from their peers operating in the specialism. When combined with industry professionals and leading experts they engage, provides a strong support for academic standards. Our members would like future work in this area to further explore collaboration and communication between degree awarding providers and delivery providers in the area of external examiners in order to identify good practice. In some of our members' cases, the awarding partner appoints external examiners and dictates the cycle to which their reports are reflected on and recommendations implemented. While this works for some providers, others report challenges such as: external examiners not always having the right expertise for the subject; reports being received too late to make the recommended changes for the following academic year; and difficulties arising from the partners having vastly different academic delivery models. Guidance which specifically recognises the importance of this aspect of the partnership will support efforts for more effective and rigorous external examination practice.

8. What are the:

    a. opportunities and/or

    b. challenges

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

We support integrating more of the work done by external examiners into the UKPSF. Proper recognition of the qualities, competencies and levels of this important role places appropriate value on the work of external examiners but also helps those who might be interested in becoming one to understand what is required.

One of the challenges arising from the recent proposals around external examiners is the ability to access the training package by Advance HE. Most independent providers are not members of Advance HE due to a combination of historical exclusivity and financial barriers. Using this training for external examiners would only be beneficial if the whole of the sector were able to gain access to it separately from membership of Advance HE. Small and medium sized institutions should not be priced out of vital initiatives to support the health of the sector.

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

Not all providers have control over their degree algorithms. Providers delivering validated or franchised provision have their algorithms determined by their degree awarding provider. Moving to a single degree algorithm for an institution or setting a nationwide algorithm based on subject could have significant negative impact on small and independent providers in collaborative partnerships.

Changes to degree algorithms must not have a negative impact on student choice or innovation in HE. The innovative delivery and pedagogical models that many IHE members offer may need a specific algorithm which does not align naturally to a single institution model or subject-level algorithm based off a multi-faculty and/or large institution. For example, many of our providers design degree programmes with a unique credit weighting and assessments which are embedded in industry-based learning. These can often be difficult to fit into degree algorithms which are based on more traditional credit models. Too much homogeneity in degree algorithms will limit innovation and diversity and thus student choice.

Consistency in degree algorithms is also important. Any changes to the degree algorithm will often take over a year to implement and could affect two or more cohorts of students. This is because any changes will need to go through the lead provider's academic governance processes as well as the subcontracted/validated provider's processes. The impact on students of implementing degree algorithm changes must be taken into consideration.

Another barrier is the effect that PSRBs can have on algorithms and the design and classification procedures of a degree. Introducing provider level or national level algorithms could be contrary to the needs and requirements of professional bodies accrediting certain degrees. International regulators can also have oversight of the delivery and make-up of degrees and could insist on a different algorithm.

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.

The cause of degree inflation cannot be attributed to just one of the of the highlighted practices. These different practices need to be looked at together as it is more likely to be a confluence of factors which leads to degree inflation. Prescribing how providers should weight their marks or deal with 'zones of consideration' would not be an effective way of supporting providers to tackle this issue. However, the statement should be accompanied by a set of guidance documents for new providers, collaborative partnerships or those considering changes to their processes on these individual practices. This could include recommended weighting of marks, suggestions on the 'zones of consideration', and where 'discounting' marks works well and where it doesn't. It should also be noted that the process for awarding specific degree classifications will include aspects like resits and mitigating circumstances which will not necessarily be factored into the degree algorithm but could change overall results.

PSRB influence should be considered in degree algorithms, hence why an institutional algorithm may not be effective if professional bodies only engage on certain courses. Many IHE members offer degrees which are industry led and this must be reflected in the way in which classifications are established. Our members have a significant diversity of industry bodies which accredit their courses, and some providers are industry professional bodies themselves.

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.

The proposed classification may be useful for those thinking of entering the sector, new providers, or those who are applying for degree awarding powers and want to use a standardised system rather than the system of their previous partner institution. This could be used as a guide to good practice rather than a fixed set of criteria which providers must retrofit. Some of the language in the proposed classification descriptions is quite prescriptive and not transferrable to more creative, innovative or industry-led degrees. We encourage language which promotes and does not limit diversity and innovation in higher education.

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

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.

Where possible any incorporation of classification descriptions should be incorporated across the UK's different national quality assurance and regulatory frameworks. As mentioned above, our members face unique challenges working across these national frameworks and regulatory processes as they must often meet separate regulatory requirements in each nation to ensure that students can access funding to study on their chosen course at these institutions. Collaborative partnerships also extend across borders and complications can and have arisen where the national frameworks diverge. We would stress the importance of a UK-wide approach to alleviate these specific concerns.

14. How should the proposed classification description be incorporated into:

    a. institutional practice

    b. other relevant documents or frameworks?

We strongly recommend additional guidance which supports the incorporation of classification descriptions into the development, processes and agreement of collaborative partnerships. This is vital to protect the diversity of delivery that is often a much-valued feature of these partnerships. For example, more accelerated degrees are delivered as part of collaborative partnerships than outside of them. Changes such as those proposed could therefore have a significant impact on accelerated degree provision in particular if not properly embedded into collaborative partnerships as well as the awarding institution's processes. Guidance and best practice in this area is essential to ensure the successful incorporation of changes across collaborative partners.

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?

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

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?

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.

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 task-and-finish group should look at developing a set of good practice sector norms to inform and guide providers on degree inflation concerns, which should also include best practice for new or emerging DAPs providers and collaborative partnerships. These norms should take care to reflect the size of the provider and where they are a single-subject institution. Working with employers to understand their expectations of what each degree classification should represent would help providers heavily aligned to specific industries to support students in achieving their degrees and gaining valuable professional and industry relevant skills.

Reform option	Yes/No
Introduction of new upper award - for example, a starred first	
Introduction of a 'cohort ranking' - for example, providing additional information on graduates' position in the grade distribution	
Resetting the classification boundaries - for example, moving up by 10 marks so 80 = 1st and so on	
More regular review of Subject Benchmark Statements to keep pace with improvements in teaching and learning	
Universal HEAR format	
Other (please explain)	
No reform required	

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

Starred first - no

Cohort ranking- yes

Classification boundaries- yes

Subject benchmark statements - yes (as a priority)

HEAR - yes

21. Do you have any other comments on the proposals that have not been specifically asked in this consultation?

Subject benchmark statements are critically important to this discussion. A more practical approach to reviewing these regularly is needed.

We have not yet learned sufficiently from the failure of the HEAR to catch on. This should be explored in the context of degree classifications.

An area which has not yet been explored sufficiently is the impact of new subject areas, increased delivery of interdisciplinary and niche subject degrees and the potential for learning gain as a contextual element to degree classifications. These would for us be a

higher priority to explore in the context of reform than many of the above proposals. IHE would welcome the opportunity to discuss these further with the UKSCQA.

Finally, the greatest threat to degree inflation may be the regulatory system itself. The most effective activities to protect against genuine degree inflation are those that recognise the risk inherent in a system which penalises providers when students do not receive high degree classifications, or the expected graduate outcomes from the classifications they get. This risk must not be lost in the pursuit of solutions to this issue. The rapid expansion in the number of students gaining a degree, and government initiatives to ensure greater access and success for those who wish to study at this level, are likely to have had an impact on the metrics presented. As a sector working collaboratively with regulators and the government, we should make sure that we understand this impact before making changes that might be more to the detriment of students than the problems that these proposals aim to solve.