

QAA Consultation on Changes to the Academic Infrastructure

1994 Group response to QAA's consultation on changes to the Academic Infrastructure.

Submitted: 1 March 2011

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The following is the 1994 Group's response to QAA's consultation on changes to the Academic Infrastructure. For more detailed information please refer to the individual responses of our member institutions.

Members of the 1994 Group are: University of Bath, Birkbeck University of London, Durham University, University of East Anglia, University of Essex, University of Exeter, Goldsmiths University of London, Institute of Education University of London, Royal Holloway University of London, Lancaster University, University of Leicester, Loughborough University, Queen Mary University of London, University of Reading, University of St Andrews, School of Oriental and African Studies, University of Surrey, University of Sussex and University of York.

Consultation Questions



Podcast on
consultation
question 1

Consultation question 1

For the purposes of the UK Code of Practice for standards, quality and enhancement, the following definitions will apply:

- **Threshold academic standards** are the level of achievement that a student has to reach to gain an academic award. For similar awards, the threshold level of achievement should be the same across the UK.
- **Academic quality** is a way of describing how well the learning opportunities available to students are managed to help them to achieve their award. It is about making sure that appropriate and effective teaching, support, assessment and learning opportunities are provided for them.

Are these the appropriate definitions?

The above definitions are broadly appropriate and helpful, providing clarification of these key terms. We are pleased with the emphasis within the new Code of Practice on threshold academic standards to be met for all higher education awards. This

appropriately recognises the centrality of broad comparability of academic standards to effective national arrangements for managing academic quality and standards. We have, however, a few points of concern.

We welcome that 'threshold standards' refer to a minimum level of achievement and that individual awarding bodies are free to set standards of performance above the threshold. However, we feel that this should be made clearer in the definition by amending it to state that for similar awards all HEIs should ensure that their programmes meet or exceed this threshold standard. We also question whether this definition of threshold standards would eradicate questions about the comparability of different degree classifications between universities.

Regarding the definition of 'academic quality', we are concerned that the proposed definition as it stands is not a definition of academic quality but rather of quality management. The term 'academic quality' is being used to describe the management of learning opportunities rather than the actual quality of the student learning experience being delivered. Therefore, another term should be used which indicates more clearly what is being described, such as 'Academic Quality Management' or 'Management of Learning Opportunities', or the emphasis of the definition should be shifted. A reference to 'learning resources' should also be included within the definition.



Podcast on
consultation
question 2

Consultation question 2

Do you agree that the components of the Academic Infrastructure should be restructured into the UK Code of Practice for standards, quality and enhancement? Will the new Code of Practice make clear the distinction between standards and quality?

We believe that it is sensible to gather all the key reference points of the Academic Infrastructure into one Code of Practice. This should provide a more coherent and integrated framework for institutions to work with. It would also bring the Academic Infrastructure into line with the approach that has been taken in Institutional Audit, and which will continue under the new Institutional Review method.

The distinction between standards and quality is largely clear and the separation into two different sections of the Code has the potential to be helpful. The further sub-division of some sections will also be helpful. However, there is a risk for confusion, especially as the subject matter of certain topics will be split, and the divide could be artificial. In Section B the consultation document queries whether the length of sections is of importance, we do not find this to be a significant problem.

We welcome the proposal that one of the overarching topics to be specifically addressed in each chapter will relate to the needs of non-traditional learners including those who study part-time.

While we are pleased that there are proposals to outline obligatory requirements and recommended good practice, we are still worried that this is an area for confusion. We support the sharing of good practice and the supply of guidance to institutions for reflecting on or reviewing their own processes, but stress that institutional autonomy needs to be maintained. Therefore, while there are already elements and issues that

are *de facto* minimum expectations, it is important that these obligatory minimum expectations should be kept to those matters essential to ensuring that HEIs are appropriately exercising their responsibilities as awarding bodies. In other areas, the content of the revised Code should provide guidance and a reference point. The focus should be on the quality rather than the quantity of regulation. It is important that the language of the Code reflects the distinction between regulation and recommendation.

A specific issue where the confusion of obligatory and recommended comes into play is the Programme Approval and Review. It is not clear why this forms part of the mandatory section of the new Code. The ways HEIs approve, monitor and review new courses varies too differently between institutions to fall under one regulatory framework and would benefit more from being informed by guidance on good practice. It is important that the Code is flexible enough to allow for different realities and practice in different types of institutions.

Furthermore, one of the major benefits of quality assurance is that it can offer assurance to the international market that UK HE is of high quality and has robust standards. Therefore, clear explanations of the distinction between what is obligatory and what is recommended is important, so that stakeholders understand what an institution must do in order for its awards to be valid and credible and what institutions should put in place in order to support students in achieving these objectives.

We are concerned that there is suggestion of an extension of the revised Code of Practice in the consultation document. It is asserted in the consultation document that the revised Code would be based on the existing reference points and would not mark a fundamental change to the status quo. However, there are suggestions that the Code might actually incorporate new and/or expanded coverage, for example the areas of learning and teaching issues relating to quality enhancement; student support, guidance and learning resources; student representation; and the incorporation of the QAA *Guidelines on the accreditation of prior learning*. Although we have previously seen an expansion of the remit of the Academic Infrastructure positively any development should not detract from the key issues relating to an institution's exercising of its responsibilities as an awarding body. The principle of institutional autonomy should be preserved and an expansion should not increase the burden on the resources of HEI's especially considering the current funding environment.

The focus on the student as a partner in their learning journey is appropriate and the emphasis within the document on student involvement in enhancing quality is well aligned with the current climate. However, there is a danger that the student might see him or herself as a customer shaping the service he is purchasing. It would be helpful if the Code could in some manner capture the fact that students have a responsibility to engage and develop as learners; including the academic environment in which students are studying in learning opportunities might foster this.

Consultation question 3

The two areas highlighted for future work are the status of credit frameworks and provision of information at programme level. Do you agree that these

should be priorities for future work ? Do you agree that in due course the Code of Practice should include a Part C on Information?

We have no objections to assigning these two areas as priorities for future work.

We welcome future work to bring clarity to the status of credit frameworks. In considering the credit framework it is important that the benefits of the full array of approaches taken by HEIs are retained. We especially stress the importance of retaining, within individual HEIs, the autonomy to make decisions on whether to permit credit transfer in specific instances. A further welcome development would be the inclusion of references to skills and possible co-curricular supplements. We would also urge QAA to clarify the status of credit transfers between UK HEIs subject to QAA review in respect of the Agency's definition. A clear explanation of how UK credit works in comparison with European frameworks would be helpful, to better facilitate graduates pursuing future study or work in Europe. We would hope that there would be full consideration of the Bologna context.

In relation to the provision of information at programme level, it is right to recognise the important role of programme specifications in quality management but these have, in this context, been of limited value in providing information to prospective students. We do not believe that students are the intended audience of this type of programme specification, and this should be acknowledged.

We would stress the importance of QAA not undertaking further developmental work on programme information until an initial evaluation of the proposed Key Information Set (KIS) has been carried out. The extent to which the KIS meets the needs of end users should be reviewed and analysed, including a cost benefit analysis, prior to any steps being taken to further increase the information reporting burdens on institutions. In a difficult financial time, it will be a significant stress on resources if institutions have to maintain, for each taught programme, a programme specification, a KIS, and a further set of information relating to 'teaching, learning and assessment methods'. Furthermore, HEIs already make available their own documentation and information to students and stakeholders. We caution against seeking to apply one template on all institutions.

If provision of information will be included in the Code, a Part C on Information would be welcome. It is important that there is a single clear reference point for published information against which HEIs are judged in this area. However, Part C should be a summary of those reference points that are already in place or are being agreed and should not be expanded beyond the requirements for published information currently being agreed by Universities UK's Higher Education Public Information Steering Group.

We would furthermore urge for clarification on the implications for predominantly postgraduate institutions of proposals for programme level information, considering that it is presently almost exclusively undergraduate driven.



Consultation question 4

Will the UK Code of Practice make clear how UK higher education providers set and maintain threshold academic standards and assure and enhance academic quality?

Is the name 'UK Code of Practice for standards, quality and enhancement in higher education' appropriate?

We believe the new Code will largely make clear how UK HE providers set and maintain threshold standards and academic quality although it is difficult to comment in full until the new Code had been seen in its entirety.

We welcome that the new Code will create a single point of reference for anyone seeking assurance or information on standards, quality and enhancement in higher education.

However, the usefulness of the Code to bring clarity will largely depend on to whom it is aimed at. As a reference document for the academic community it will hopefully provide a clear and coherent framework to work with, and the use of underpinning principles and overarching themes throughout the Code should help here. For communicating to the general public, university applicants and students how institutions assure standards and quality, we believe a 'road map' to be much more appropriate. We do not believe that the intended audience of the Code should be an external one. However, through a targeted document such as a 'road map' the public could understand the role and effectiveness of the revised and restructured Academic Infrastructure.

The name seems broadly appropriate, particularly if the audience of the Code is primarily at institutional level.

This is a response on behalf of:
1994 Group