



**Established** to promote excellence  
in university research and teaching

## **Review of External Examining Arrangements in the UK**

Response to the discussion paper on the Review of External Examining Arrangements in the UK.

**Submitted:** 1 October 2010

**Contact:** Dr Harriet Dunbar-Morris (Senior Policy Officer, 1994 Group),  
[harriet@1994group.co.uk](mailto:harriet@1994group.co.uk), 0207 872 5595

The following is the 1994 Group's response to the UniversitiesUK/GuildHE discussion paper. 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.

---

While the 1994 Group's answers to the individual questions of the consultation paper follow below, there are some issues we would like to raise for which we could find no obvious place elsewhere in the document.

We welcome both the sensitive approach taken and the proposals offered to secure greater public confidence and understanding of this vital aspect, External Examining, for securing comparable academic standards across the higher education (HE) sector. It is pleasing that the consultation paper considers the overall process to be robust while at the same time acknowledges that "*aspects of external examining may seem puzzling, even suspect*" to members of the public. Looking at the debate conducted in the national press and by government, we acknowledge that, as a sector, we ought to come together and communicate the purposes of External Examining in a more coherent and consistent manner. However, we recognise that the process of External Examining is difficult to communicate to the general public, and that it presents only one dimension of the academic standards framework that alone cannot guarantee academic standards. A more authoritative statement on expectations together with common processes might go some way towards addressing public confidence.

We are, however, hesitant to the benefits of a "one size must fit all" system of External Examining, as we feel that the standards of all degrees in the UK HE sector (regardless of the awarding institution) are probably not directly comparable. We recognise that this is a difficult area but would encourage the Review Group to find some way of explicitly

acknowledging this and to recognise that there will (and ought to be) some variation to the way in which External Examiners are utilised and dealt with across the sector.

A second general concern we have is that there is very little in the consultation document that recognises the additional issues surrounding international collaborative partnerships. Specifically, there is nothing that recognises the QAA view that validated international programmes should use External Examiners with experience of the UK HE sector standards who are competent to make judgements about the comparability to international standards.

Thirdly, the Group finds it unclear why the principles set out in the consultation paper have been limited to the External Examining of taught programmes. Although the Group recognises that there are important differences between the features of taught and research degree programmes, External Examining plays a similar and equally important role in assuring academic standards in both types of programmes. Many of the practical issues relating to External Examining are common to both types of provision, and the principles in the consultation document are therefore as relevant to research degrees as they are to taught programmes. It is important that the role of External Examiners for both research degrees and taught degrees is understood by stakeholders. Consequently, the failure to consider both types of provision as part of the current review risks a lost opportunity; we therefore urge the inclusion of explicit proposals that cover good practice in research degree External Examining.

Lastly, we wish to highlight that within the Group, member institutions solicit and make use of External Examiners' comments and advice on course design, standards issues, exam regulations and process issues. Many specific and several systemic changes to procedures and to regulatory framework are made as a result of comments from External Examiners.

**Question 1: Are these principles acceptable and are there other principles that should be considered?**

Broadly, the 1994 Group finds these principles acceptable. However, we wish to make a number of comments.

The Group welcomes and supports the emphasis within the proposed principles on the responsibility of institutions to set the standards for their own awards. This rightly recognises the status of institutions as autonomous degree awarding bodies. However, at the moment the principles do not explicitly acknowledge that External Examiners are appointed by, and are responsible to, individual institutions.

Thus, regarding Principle 1, the Group would strongly suggest that it should include more explicit reference to the fact that External Examiners do not act in isolation and that the system complements other aspects of the UK HE Academic Infrastructure, notably qualifications frameworks, subject benchmarks, programme specifications, QAA Codes of Practice and, in some cases, Professional, Statutory and Regulatory Body (PSRB) accreditation.

The Group is, furthermore, concerned that the reference in Principle 1 to institutions setting standards "*within the context of common guidelines*" does not fully reflect the emphasis in the recent UUK statement on academic standards on the concept of threshold standards that all higher education awards must meet. Consequently, the Group proposes that the statement in Principle 1 should be amended to refer to institutions being responsible for setting award standards that meet or exceed threshold standards defined in national qualification frameworks. This explicit reference to the national qualification frameworks

would also help to strengthen the point made in Principle 1 that External Examining is one of a number of mechanisms in place in HE to assure the academic standards of awards.

In addition, with regards to Principle 1, the Group believes more emphasis should be placed on the international perspective. We recommend explicitly recognising the strength of the UK system, whose External Examiner system in combination with the Academic Infrastructure makes the UK system significantly different from most other international QA arrangements, and which is internationally perceived as extremely strong and secure.

In regards to Principle 2, the Group recommends amending it to make it clear that External Examiners are appointed by, and responsible to, the institutions in which they are examining, with the operation of External Examining in each institution being subject to robust external review through Institutional Audit.

With regards to Principle 3, the Group would like to express concern that this principle should support high standards and fairness across institutions without introducing further bureaucracy and uniformity. Therefore the Group feels that it might be more appropriate to propose the development of “*minimum expectations*” of the External Examining system, rather than proposing the development of “*external examining expectations*”, thereby allowing for flexibility in the role of External Examiners and avoiding placing constraints or restrictions on institutional practice.

Equally, the Group feels that the reference in Principles 3 to “*nationally consistent*” External Examining arrangements could be misconstrued, particularly in respect of postgraduate study, as it will not be possible to have nationally consistent arrangements that suit all levels of study, as those for the examination of doctoral programmes are necessarily different from arrangements for undergraduate examinations.

**Question 2: Are these initial ideas and the distinction between judgement and advice a helpful starting point for developing minimum expectations? Where might these initial ideas be clarified or developed to ensure that it is relevant to all institutional practices?**

The Group finds the initial ideas generally helpful, and supports the importance of clarifying the role of the External Examiner and creating a set of minimum expectations based on the QAA Code of Practice. The Group considers the distinction between judgement and advice welcome and of potential value, but cautions that it might be found unclear at times. However, there are a number of areas where the initial ideas might be clarified and developed to ensure their relevance to all institutional practices.

The Group would like to point out that if a core role description is to be developed this must not lead to a situation where there are multiple reference points for External Examining. To reduce unnecessary bureaucracy and duplication, the current work of the UUK/GuildHE working group and the QAA’s revision of the Academic Infrastructure must result in a single published reference point for External Examining. The QAA Code of Practice concerned with External Examining arrangements provides a solid basis on which minimum expectations for External Examiners can be developed. The consultation paper’s statement that it is for institutions to set standards, and for External Examiners to contribute to the maintenance of these standards, is a helpful starting point for defining this core role description for External Examiners.

The guidance to External Examiners ought to be very clear about what is expected from them; this includes making clear the expectations of the role to External Examiners recruited from outside academia. It may be appropriate to distinguish between what External

Examiners do (sample scripts, review alignment of the programme to qualifications frameworks, etc.), and the powers of External Examiners (advise that the student cohort be re-marked, provide a comment on standards, etc.). It might also be helpful to include guidance as to what External Examiners should not be expected to do. Finally, it might be helpful to tap in to areas where External Examiners' expectations of their role do not currently align with universities' policies, and thereby determine where tension points are and where clarification or greater guidance would be beneficial.

The document as a whole needs to recognise in which different contexts the guidance for External Examiners is to be used. It ought to make it clear whether the guidelines should be applied on undergraduate as well as postgraduate programmes, and taught as well as research degrees. One example of where such a clarification would have been helpful is in paragraph 31, which states that *"the external examiner does not, on the whole, get involved in the examining and assessment of individual students"*. However, at MPhil/PhD level External Examiners are involved in the examination of individual students through both the reading of the individual thesis and attendance at the viva voce examination.

The framework that is developed needs to take into account that HEIs are diverse; the guidelines must accommodate this and provide for specific institutional practices, and/or differences between courses and subjects. This also means that comparisons between different institutions might be problematic. QAA Codes of Practice establish the principle that rules of assessment should be consistently applied across different disciplines and exam boards. Institutions themselves (but not External Examiners) can apply some statistical review of mark and degree class distributions across disciplines, and longitudinally across different years. However, different student cohorts' capabilities are not identical (especially for small numbers) and mark distributions for individual modules differ significantly. It is difficult to make statistically reliable comparisons between different institutions because of different subject mixes, and different programme structures and content. However, the QAA, via Institutional Audit, should be in a position to provide an effective system for ensuring a degree of parity across institutions both in a subject-based and institution-based manner.

The Group would also like to comment on two specific suggestions in the consultation document. Firstly, it is proposed that External Examiners should have the power to advise that a student cohort be re-marked. We would question the logistical implications of this statement as it stands - if what is being proposed is a power of advising scaling then this is manageable; however, if it literally means re-marking of all scripts then this could mean hundreds of papers, seriously delaying the release of marks to students and having a knock on effect for all subsequent procedures. Secondly, we would note that some HEIs' rules of assessment result in there being no discretion around borderlines – consideration of marks at the borderline of classification in individual modules might therefore be appropriate, but not appropriate at the overall module aggregation or award level.

**Question 3: In order to increase transparency and public confidence should there be clear expectations about the selection processes in institutions and the processes should be publicly accessible, do you agree?**

The opinion of the Group is that there should be clear expectations about the selection processes in institutions, and that the processes should be publicly accessible; this is felt to be the case already in many HEIs within the Group. However, the Group considers it unlikely that there would be major public interest in the selection processes, and suggests that there are more pressing issues to pursue concerning External Examiners, for example ensuring that HEIs have access to the fullest possible pool of potential External Examiners in their recruitment process.

The Group would also note that, for reasons of confidentiality, the selection process for each individual appointment should not be publicly accessible.

An alternative to making the selection processes publicly accessible could be to require of institutions to have a written policy, which could be audited as part of Institutional Audit and made available to others on request. Public confidence in the system could also be improved by greater transparency in regard to the fees associated with External Examining, possibly with common fees across the sector.

**Question 4: There should be a national set of generic criteria established for the appointment of external examiners, do you agree? What should be included in the criteria?**

The Group agree that there should be a national set of generic criteria for the appointment of External Examiners. However, it is important that these criteria are kept broad and general, and allow for variations specific to individual institutions, to individual subjects, and to cover requirements of both undergraduate and postgraduate programmes (including research degrees). Flexibility needs to be maintained in these criteria to allow for different models in operational areas, such as the number of External Examiners and whether these are module or programme-based. The establishment of national generic criteria should also be implemented in such a way as to ensure that it remains clear that the power of appointment lies with individual institutions. The criteria currently detailed in Section 4 of the QAA Code of Practice might be appropriate for establishing the national criteria.

We would highlight some dangers of a national set of generic criteria. It might be that national criteria become so rigid that there is no space for the application of academic judgement. Generic appointment criteria might create an additional and unnecessary layer of bureaucracy and add to the burden of identifying and recruiting appropriate External Examiners. If potential External Examiners are required to provide evidence to the recruiting institution of their suitability for the role, this might further dissuade well-qualified candidates from undertaking the role.

If national criteria were to be established, they should map closely to the description of an External Examiner's role and national minimum expectations for External Examiners. An External Examiner's experience and expertise must equip them to perform the role, but appointment criteria would need to be flexible enough to recognise that this experience and expertise might not fall exclusively within academia. We would expect appointment criteria to include the following:

- (i) competency and experience in assessment processes;
- (ii) knowledge of the expected standards of student attainment for the level of award being assessed, including knowledge and understanding of threshold standards and any subject benchmark statements;
- (iii) appropriate discipline/subject knowledge;
- (iv) cannot have, and have not had for some reasonable time, any association with the HEI appointing them, other than as External Examiners;
- (v) having the time available to carry out their duties to an HEI if and when appointed;
- (vi) no conflict(s) of interest likely to affect the performance of their duties;
- (vii) experience of teaching, at various levels, across a wide range of topics in the relevant subject area;

- (viii) working knowledge of the UK HE system (including the 'Academic Infrastructure');\*\*
- (ix) a sole appointee as external examiner should ordinarily be of senior lecturer level or above (or equivalent grade). However, a less senior appointee may be appointed normally only when there is already at least one experienced serving External Examiner;
- (x) sufficient breadth of experience to be able to monitor and make judgements on the comparability of academic standards with similar programmes at the same level in other institutions;
- (xi) a fixed period of appointment (e.g. up to four years).

There would also need to be reference to the requirements for External Examiners used on international programmes.

\*\*The criteria should also recognise that some programmes have a practical, creative or professional dimension or have a unique specialisation (e.g. languages) benefiting from external input from outside the UK, and as such External Examiners may sometimes be practitioners rather than university-based academics. Indeed, some PSRBs require the university to appoint chartered practitioners. In such cases, it would seem appropriate that at least one of the External Examiners should hold an academic appointment in the UK in order for a judgement to be made on comparability of standards with other HEIs.

**Question 5: Should all institutions provide induction for external examiners who are new to the institution, and training and development for first time external examiners? Should a common core programme and template for induction and training be developed?**

The Group thinks that all institutions should provide induction for External Examiners who are new to the institution, and training and development for first time External Examiners. However, the Group has a number of comments to make.

We would like to strongly emphasise that induction and training should not have to take the form of face-to-face meetings. The method of delivery of training and induction should not be prescriptive, and HEIs should be able to choose what would be most efficient, appropriate and cost effective for them. Online resources, distance learning models, podcasts, one-to-one support from the relevant department, documentation, meetings and briefing events are all valid options. Requirements to attend specific events take up valuable time that External Examiners have already given up from their schedules, and can be disproportionately expensive given the relative benefits, especially for small institutions.

Additionally, it might be a good idea to have in place mechanisms for mentoring less-experienced External Examiners, for example by pairing them with more experienced ones.

The development of a generic national role description and a common set of expectations would appear to go a long way to ensuring that new External Examiners understand their role. It would be helpful if key principles embodied in the QAA Code of Practice on External Examining, such as moderation of the overall cohort of students' work rather than re-marking individual students, could be enforced at a national level. The volume of new External Examiners nationally could justify fairly regular delivery of a QAA 'New to External Examining' course, which again would demonstrate public consistency of standards, and would parallel the training that is required of QAA auditors.

However, the Group is ambivalent about developing a common core programme and template for induction and training. Whilst we feel that a common core programme might not be the right solution, a common template might be beneficial.

A common core programme would not be helpful since there is a great deal of variation between HEIs, and significant variation in the examination requirements between undergraduate provision and research degree provision, which needs to be allowed for. A common programme would risk being too generic to be seen as being of use, and might have to be supplemented by a further induction into the individual institution and programme, and not therefore be an efficient use of resources.

A common template might be a better solution. However, any template should give individual institutions discretion to run additional or varied activities and to add induction material on the institutional structure, degree regulations and processes, as they think appropriate, as well as accommodating different delivery methods.

Furthermore, it would be important to differentiate training (of an institution's own staff) from induction (of External Examiners appointed by an institution), which will be less skill-based and more information-based. There is a concern that were induction to go beyond providing contextual information, sufficient to allow External Examiners to navigate their way around the regulations and course structures, there would be a risk of undermining their externality and thereby diminishing their value as critical friends.

Training for External Examiners who come from outside the UK university system would need to be addressed separately.

**Question 6: The importance of this role should be recognised by all Universities and institutions with degree awarding powers in promotion procedures, including clear and demonstrable recognition of the value to the institution, the subject and the sector, do you agree? How else should it be recognised?**

The Group generally agrees that the importance of the role of External Examiner should be recognised by HEIs in promotion procedures; and on the whole, the Group believes that many of its HEIs already do this. There are, however, a number of issues that the Group would like to raise.

While criteria for promotion should recognise work as an External Examiner, it is only one aspect of an academic portfolio that would be seen as having a value for many senior posts across teaching, research and administration. It should not be a compulsory criterion for promotion, as there may be very good reasons why individuals do not serve as External Examiners and these people should not be held back from promotion. The Group, furthermore, does not believe that the ability of institutions to set their own promotion procedures and criteria, in accordance with their strategic priorities, should be constrained by a nationally-imposed requirement that External Examining is recognised in promotion procedures and criteria. The Group also feel that it is questionable as to what effect a national statement on recognition would have on autonomous institutions and their own complex staffing needs.

The Group furthermore believes that the role should be recognised in terms of making time available for staff to undertake External Examining duties. External Examining should be considered as a standard part of an individual academic's professional development.

Other ways of recognising the importance of the role could be if External Examining was formally recognised, for example by providing staff with a prompt within appraisal and promotion documentation to mention or list their External Examining experience.

Another suggestion would be to have a debate about the remuneration for the duties, as many feel the fee is not proportionate to the workload involved. This discourages some capable staff from accepting appointments, and may impact the rigour with which the role is carried out both by Examiners, and by institutions, in terms of accepting pragmatic rather than comprehensive levels of attendance to oversee examining and assessment processes, which have diversified considerably in recent years. Recognition may also be enhanced if national guidelines are produced regarding remuneration for the role. However, given the current financial constraints on institutions, the Group recognises that it is difficult to see how the value of the role could be recognised in enhanced fees or how a national fee framework could be implemented.

The Group notes that the QAA Code of Practice places emphasis on the need for externality in a number of areas, but focuses our attention on the need for External Examiners to monitor and advise. This appears to miss the second component of this equation, which is that members of internal staff who act as External Examiners or external members of review panels elsewhere may also act as a conduit for shared practice and experience. It would appear desirable for the potential for institutions to learn from each other to be emphasised.

**Question 7: Should there be a national template for external examiners reports?**

The Group is divided on the necessity of a national template for External Examiner's reports.

On the one hand, it is felt that if there were to be national minimum expectations of External Examiners, then a national template for reporting would be appropriate. A national template should be related explicitly to the Academic Infrastructure and might contain a set of core questions based on the QAA's draft minimum expectations published in Section 2 of the Review paper. However, if there were to be a national template, the Group would like to stress the importance of this template containing an institution-specific section to allow HEIs to adequately reflect their institutional requirements and to ensure appropriate flexibility to cover the whole range of local practice.

On the other hand, the Group feels that if the QAA Code of Practice guidance on report content offers appropriate advice on reporting, which allows reports to be tailored to the arrangements and needs of the individual institution, whilst meeting minimum expectations, justifying the need for a national template would be difficult, especially if there is no expectation that it would be published nationally. Clear guidelines that require External Examiners to report on the core responsibilities that they need to fulfil might be more appropriate, with the emphasis being on specifying the issues that need to be covered by all reports. It is, furthermore, felt that current institutional templates generally meet institutional needs and have been reviewed and refined over time, thus there is an apprehension at the risk of losing these. Generic templates are also felt rarely to map on to or meet institutional or departmental needs. It is unlikely that a national template could be sensitive enough to individual institutional or departmental needs. A final issue that the Group would like to raise is the potential technological barriers that might exist across HEIs to a national template.

**Question 8: Should there be a specific section written for students and should this be made available to all students within the institution, and made available to any external party on request?**

It is the perspective of the Group that there should be no specific section written for students. Producing a separate section may risk the perception that full information is being with-held or that Examiners provide less full feedback. There are also concerns that this would create an unjustified additional administrative burden and would not be cost effective.

Many HEIs have practices where Examiners reports are received by student representatives, have arrangements where the full report is accessible, and in all cases Examiners reports are available through the Freedom of Information Act.

If there were a requirement for a specific section to be written for students, it is the view of the 1994 Group that this information should not be made available in the same way as Teaching Quality Information (TQI) has been.

**Question 9: Should all reports and all analysis of reports be shared with student representatives?**

The Group agrees that all reports and all analysis of reports should be shared with student representatives, and the Group feels that its member institutions already make the reports and analysis available to student representatives via their individual institutional processes.

**Question 10: Should all institutions publish names of all external examiners, their job titles and institutions? What would be the most effective way of ensuring that this information is easily accessible?**

The Group is against the idea that all institutions should publish names of all External Examiners, their job titles and institutions. The Group would like to express a number of concerns.

The most pressing concern is the fact that HEIs have a responsibility to protect the privacy of External Examiners, and to remain in line with the Data Protection Act. Related to this, the Group would like to caution against vexatious approaches towards External Examiners by students, if their names were to be made public. It would have to be made very clear that students should not contact External Examiners directly. Although the Group feels that such contact is almost inevitable notwithstanding any statements the sector might make.

Furthermore, the Group would like to question whether there really is a demand for this kind of information to be published. The information might be made accessible to students on programmes, but if it were to be made available to the general public, the Group would like to identify clear evidence of a public demand for this information, which demonstrated that access to this information would improve the overall perception of External Examiners.

The Group would also like to caution against the additional workload and cost that would be associated with publishing names.

The Group feels that the most cost-effective way of ensuring that this information is easily accessible might be to publish information extracted from existing databases on a central office website. However, a more user-friendly approach might be to link the names of External Examiners to internal and/or external course webpages, however this would require substantial resources. Other mechanisms for achieving similar results as publishing the names should potentially be explored. For example, it might be sufficient for Institutional Audit to confirm that appropriate arrangements are in place, or for an institution to publish a single statement setting out its arrangements.

**Question 11: Institutions should have in place transparent internal procedures for considering and dealing with robust discussion of issues and concerns which include the possibility of making a report direct to the head of the institution? Do you agree and what else might these procedures include?**

While the Group strongly agrees that these sorts of measures should be in place, we feel that HEIs in general already provide sufficiently in this area, we do not therefore see the need for any additional procedures for handling External Examiners' reports. HEIs in general employ routines where a report of External Examining is made directly to the head of the institution, or where any serious concerns are brought to the attention of senior management. The Group agrees that measures like these provide an important safeguard. It is vital to ensure that External Examiners can confidentially report to the head of the institution if they so wish, to ensure that there are clear and documented processes for the consideration of, and response to, issues of university policy that cannot be addressed at the level of the academic department/programme team; and to ensure that any results are communicated to the relevant External Examiner.

A special confidential section in the report would probably be of limited use, as there are not many issues that would need to go into such a section, and those that do could be raised verbally or by writing to the Pro-Vice Chancellor with responsibility for academic affairs.

There is usually some element of judgement as to which matters are of a sufficiently serious nature that they need to be seen by the head of the institution or other senior management. It would be more transparent to provide the External Examiners themselves with the opportunity to state whether they wish a particular concern to be treated as a matter of serious concern. This could be accomplished by:

- (i) a question in the annual report form asking specifically if there are matters of serious risk to academic standards that he/she wishes to be considered by the University;
- (ii) guidance provided that the External Examiner may write to the head of institution and the Registrar about any serious risks to academic standards and/or the security of the assessment process.

In addition the common reporting template might usefully include a question about whether concerns raised in previous reports have been adequately addressed. This would provide a more explicit and consistent audit trail across the sector.

**Question 12: Should there be a clear and independent mechanism for external examiners to use once they have exhausted internal procedures? Does the QAA Causes for Concern procedure represent an appropriate mechanism?**

The Group thinks that there should be a clear and independent mechanism for External Examiners. However, the Group would like to emphasise that it has to be made explicitly clear that such a mechanism should only be used once internal procedures have been exhausted.

The Group finds that the QAA Causes for Concern procedure represents an appropriate mechanism. However, the wording should be made stronger, to ensure that it is absolutely clear that this procedure would only be used as a last resort. There is also a distinction to be made between a complaint about process and a complaint about standards. The latter is a matter of academic judgement, and so it would be inappropriate for a QAA investigating officer to make a judgement on this. In addition, there should be guidance about the grounds for complaint which does not currently feature in the Causes for Concern procedure.

If the QAA Causes for Concern procedure were to be used, it should be publicised by institutions in the guidance they provide to their External Examiners (probably to include a web link to a dedicated QAA page). External Examiners would also have to be explicitly added to the list of those entitled to raise concerns under the Causes for Concern procedure. Consideration will need to be given to any implications for PSRBs and how a Cause for Concern process raised through the QAA links to PSRB processes, or vice versa.

If used correctly, the QAA Cause for Concern procedure appears to offer safeguards in terms of requiring the External Examiner to have first raised their concerns with the institution, and requiring substantiating evidence. We would be concerned if there were to be a scheme that did not require both these components. If the current QAA Cause for Concern procedure is deemed to be ineffective, we would urge consideration of the costs of any alternative body or scheme.