**Response to *Future Approaches to Quality Assessment in England, Wales and Northern Ireland* (HEFCE 2015/11)**

We are a group of educational experts and university teachers from across the arts, humanities, social sciences and sciences who take strong exception to HEFCE’s proposals for Quality Assessment (QA) in UK Higher Education (HE). In a nutshell, our view is that the proposals have little to do with ensuring quality. They are more concerned to reduce barriers to entry to the UK HE ‘market’ for private providers offering cut-price, low-quality education. Furthermore, the proposed use of metrics on student outcomes to measure educational quality: cannot actually measure the quality of teaching; removes all responsibility for outcomes from students themselves; is likely to fuel grade inflation and teaching to the test; and will intensify instrumental approaches to education while undermining the wider social good of university education.

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

The list of 12 principles is often contradictory and vague. In particular:

* There is a superficial emphasis on HEI ‘autonomy’ (a). In reality, the proposals diminish the autonomy of HEIs and academics in quality assurance by introducing an even greater and more complex regulatory burden. As paragraph 32 states, the proposals ‘should not be read as a reduction or dilution of scrutiny’ that would make ‘institutions free to operate’ as they determine – which is the definition of autonomy.
* The emphasis on risk-based regulation (h) also contradicts the notion of autonomy in practice, as well as escalating costs, rather than keeping them ‘proportionate’ (i). Assessing the level of risk necessarily requires constant – and therefore costly – expert scrutiny. This is discussed further below.
* The demand for transparency and ease of understanding (e) appears unobjectionable but in practice could lead to very crude and reductionist collective ratings. While the decision not to include ‘star ratings’ is welcome (para 110), there is reason for concern about what alternative would be used to make QA ratings ‘easy to understand’. Crude metrics are the norm when public goods are subjected to ‘measurement’, such as the ‘above average’ and ‘below average’ ratings assigned to National Health Service institutions, which take no account of the differences in populations of different health providers. Similarly, in the construction of ‘league tables’, there is typically no consideration of the substantive significance of what is being measured. For example, results in the National Student Survey (NSS) tend to cluster tightly within a tiny numerical range, such that vast rises or falls in an HEI’s league table position merely reflect statistical noise, rather than any real improvement or deterioration of the quality of education. Similarly, the substantive difference in REF 2014 rankings was often extremely minimal. Yet, when such measures exist in a heavily marketised environment, they are taken seriously by ‘consumers’ and have massive – and consequently unfair – impacts on HEIs. HEFCE has previously rightly argued that the NSS is unfit for ranking and comparative purposes. It must apply the same standard of judgement to any QA system.
* The desire to avoid preventing ‘experimentation and innovation’ (f) is welcome, but the reality of a metrics-based system is that it would stifle experimentation. The parallel here is the REF. By measuring specific outcomes, the REF shapes research and publication strategies in ways that are safe, predictable and conservative. Academics are strongly discouraged from undertaking high-risk research that might not produce ‘REFable’ publications. The publication of short articles is promoted over lengthier manuscripts, limiting the sort of research that can be undertaken. The rise of metrics like the National Student Survey is already distorting what is taught in universities, promoting an ‘intellectual race to the bottom as lecturers are put under pressure to cut reading lists and shorten assessments’.[[1]](#footnote-1) The proposed QA regime, and the mooted Teaching Excellence Framework, will only exacerbate this, discouraging any innovation and experimentation that could potentially disrupt outcomes. Risk-taking, an inherent part of all innovation and experimentation, will be ‘non-TEFable’.
* Keeping the regulatory cost and burden of QA ‘proportionate’ (i) again seems unobjectionable – but ‘proportionate’ to what? Given the assumed centrality of the ‘student academic experience’ and the wider societal importance of education, this standard could legitimise a very high level of cost – which would ultimately be borne by fee-paying students.

**Question 2:** Do you agree that our current proposals for the use of meaningful external scrutiny as set out in paragraphs 32-34 are sufficient? If you do not agree, please indicate what additional or different external scrutiny you propose and provide the reasons for this.

The proposals to create an external body of externally trained and accredited external examiners is unwelcome.

* First, it is not clear why this is even necessary. The proposals do *not* argue that current QA systems, which rely heavily on external examination, are failing (para 18).
* The proposals indicate a wish to ‘professionalise’ external examination. But external examiners are members of academic staff who are daily involved in the design and maintenance of high quality academic programmes. To suggest that they require external training to become ‘professionals’ at this task wrongly assumes they are not already professionals. If this was the case, the present QA system would indeed be failing, which the proposals deny.
* Further regulation of external examiners is another blow to the autonomy of HEIs, despite this supposedly being a foundational principle (see (1) above). In the long run, the ‘professionalisation’ of external examiners is highly likely to create a quasi-independent inspectorate, another corpus of ‘experts’ who become progressively disconnected from, and ignorant of, the activity that they are regulating. It may also create pressures towards the standardisation of curricula, contradicting the supposed defence of innovation and experimentation.

The heavy dependence placed on HEIs’ governing bodies is arguably unwise.

* As the proposals note, HEI governing bodies are dominated by external representatives. Today, this largely means individuals from the private sector who have no experience or understanding of university teaching. It is far from clear why students, academic staff or other stakeholders should have confidence in these individuals to assure the quality of that teaching.
* It is worth noting that, while HEFCE and the Westminster government are focused on QA and the Teaching Excellence Framework (TEF), the debate in Scotland is much more clearly – and appropriately – focused on HEI governance, following the Von Prondzynski Review (2012). This review recommended the democratisation of university governance with more voice and power for students and staff. HEFCE’s proposals do nothing to achieve these important ends but instead further empower unelected external representatives, lacking in educational expertise, over the key actors in university education.

Furthermore, while there is undoubtedly a need for intervention in cases where serious misconduct is apparent, this is also open to abuse.

* Evidence suggests that external inspection regimes can often be used in this way. In HE, the targeting of London Metropolitan University over its governance of student visas in 2012 was widely seen to single out an HEI already in some difficulty. In secondary education, OFSTED has also been politicised, as in the Birmingham ‘Trojan Horse’ scandal.[[2]](#footnote-2) Again, in a context that HEFCE itself admits is ‘marketised’ (para 13), the reputational damage caused by such interventions, even when they are ultimately wound back, can be incredibly destructive. In LMU’s case, it risked the survival of the HEI itself.
* Accordingly, there must be appropriate safeguards in place to ensure that external measures are deployed only when there is compelling evidence of wrongdoing.

**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?

No. The ‘core message’ here is flawed: it is not the case that ‘ensuring that students’ reasonable expectations are met is a core responsibility of providers’. The core responsibility of HEIs towards students is to provide excellent education. Although this may well be what students reasonably expect, it is clearly superfluous and opaque to describe this in terms of the expectations of consumer-students rather the historical duty and function of HEIs. Insofar as ‘students’ reasonable expectations’ involve anything beyond excellent education, who is to determine what is ‘reasonable’? A common demand from students today is for more contact hours. From the perspective of many academics, this is not reasonable, because the ethos of university education is guided independent study, not spoon feeding.

More seriously, the rejection of ‘one size fits all’ regulation, while seemingly sensible, actually raises very fundamental questions about the nature of university education.

* The rationale for abandoning ‘one size fits all’ is that there is growing ‘diversity of providers, provision, and students’. HEFCE therefore proposes that ‘there are “student experiences” – and therefore different conceptions of “quality” – that could and should be determined by the mission of the provider, the type of provision, and the needs of the student.’
* This essentially opens the door to a plurality of legitimate meanings of ‘quality’, despite HEFCE simultaneously seeking to promote ‘reasonable comparability’ of qualifications across HEIs (para 88). Beyond a generic (and therefore presumably vacuous) ‘baseline’, it would allow HEIs to propose their own definitions of ‘quality’, justified by reference to their particular ‘business’. This can only promote divergence from the currently shared notions of what constitutes a ‘quality’ university education. One example of this in practice was the announcement by Coventry University College Ltd (an offshoot of Coventry University) of professional degree programmes at cut-price rates, but with very restricted rights for students, including no ability to borrow books from the University library or participate in extra-mural activities. These restrictions are explicitly billed as offering a different ‘student experience’ – as if something as fundamental as the ability to borrow scholarly books could be regarded as peripheral to a university education.
* It is difficult to see what else is intended by a rejection of a ‘one size’ policy than the legitimisation of such ‘cut-price’, downgraded approaches to university education. The government has been disappointed by the failure of price competition to emerge in HE following rises in tuition fees, because virtually all HEIs have opted to charge close to or at the maximum £9,000 level in order to cover the costs of maintaining existing quality levels. HEFCE’s proposals to legitimise different definitions of ‘quality’ seem designed to change this and thereby foster price competition. This is based on the false assumption that price competition would be good for UK HE, when in fact it would be destructive and destabilising. HEFCE’s proposals also seem intended to smooth the way for private providers to enter the market – which again has not yet occurred *en masse* – by conniving at a lower minimum quality threshold. Again this ignores the many concerns articulated about such providers, borne out in many cases in the United States, and increasingly the UK[[3]](#footnote-3) It also ignores how private providers’ potential to ‘cherry-pick’ – providing only low-quality versions of cheap courses – could damage the financial sustainability of broad based, traditional universities and undermine universities’ function in providing broad-based and interdisciplinary education. Above all else it risks the entrenching – as critics have long warned – of a two- (or more) tier HE system, in which poorer students will be funnelled towards lower quality institutions while higher quality, traditional universities become the preserve of the wealthy.

**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?

In theory it may be possible to establish a baseline in the form of a checklist of basic requirements for robust QA procedures. Simply providing a ‘kite mark’ to those attaining this level would be preferable to creating a dubious ranking system in the mode of the NSS, as noted above. However, our concern is that the political intention of introducing a ‘baseline’ is to set the bar sufficiently low that poor-quality private providers can enter the ‘market’ and undercut established, high-quality providers, fuelling price competition and potentially a ‘race to the bottom’. If a baseline were to be used, therefore, it should reflect the high standard currently achieved by the majority of existing HEIs.

**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?

Again this proposal reinforces the suspicion that HEFCE’s proposals are primarily intended to smooth the way for private providers to enter the UK HE ‘market’, while doing little to genuinely ensure high quality provision. In past QA regimes, it has been openly recognised that private providers simply do not have the expertise required to ensure the quality of educational provision. This is why their degrees have generally been externally validated by traditional HEIs that *do* possess this expertise. HEFCE’s new proposals do nothing to ensure that these providers will actually acquire this expertise. At present, private providers tend to ‘buy in’ curriculum design and other services from those who *are* qualified, while it is non-qualified staff who actually deliver the education. HEFCE’s proposals would potentially allow private providers to commission temporary expert input to pass the baseline inspection, then continue without the necessary in-house expertise to maintain quality and standards.

Question 14 asks whether new providers should be subjected to more routine inspections during a ‘probationary period’ following accreditation. This would be more appropriate than allowing no scrutiny at all following the achievement of a quality baseline, not least because the immature internal governance arrangements at such institutions are unlikely to be reliable.

**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?

No response.

**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?

Broadly, the ‘meta-governance’ approach suggested here, where funding bodies merely review HEIs’ QA procedures, rather than reviewing standards themselves, is sensible. However, what this means concretely is more problematic.

There is a strong emphasis on HEIs using data on student outcomes to assess teaching quality (para 41(b)). This is highly problematic for two broad reasons.

* First, student attainment is *never* a direct or reliable measure of teaching quality because it is influenced by a host of factors unconnected to the quality of teaching. Decades of research has shown that the largest single determinant of educational outcomes is social class.[[4]](#footnote-4) Yet the OFSTED inspection regime and much political/ public discourse operates as if ‘good teaching’ is the only important driver, and by extension bad outcomes must be the result of ‘bad teaching’. This is simply inaccurate. Similarly, student attainment within single academic departments frequently fluctuates considerably year-on-year. This does not necessarily signify fluctuations in teaching quality, which broadly remains consistent, but rather cohort effects based on the characteristics of a given student body – not least the students’ own efforts. The same is true for many other metrics, such as student employment and salary data, which are heavily influenced by many non-teaching factors, notably interpersonal networks, which in turn often rest on social class.[[5]](#footnote-5) As noted above, similar concerns have been raised about the use of NSS data.[[6]](#footnote-6) Given the strong social determinants of student outcomes, any metrics system based on them may reflect pre-existing social hierarchies rather than providing any objective measure of ‘teaching quality’.
* Secondly, the clear risk in using ‘student outcomes’ as a measurement of teaching quality is that it removes all responsibility for outcomes from the students themselves. At root, education is not a ‘service’ that HEIs ‘deliver’. Education is a relationship between a teacher and a student, who both bring something crucial to the table: the teacher teaches, but it is the student who learns, or does not learn. It is of course recognised that some students struggle to learn as a result of inequalities in prior educational experiences, the failure to make reasonable adjustments to student needs, or poor teaching practice. These clearly need to be addressed by HEIs and there are various (broadly successful) systems in place for doing so. However, other reasons for failure are rightly understood to be the responsibility of students themselves. Learning is intrinsically difficult, and UK HE has rightly and historically insisted that university education is about students undertaking guided but independent study. However, students obviously vary in their motivation and capacity to struggle to acquire new skills and knowledge. If student outcomes are implicitly made the sole responsibility of teachers, the message sent to students is that they do not need to take ownership of their own learning experience and work hard to succeed: if they fail, it is the fault of the teacher. It would advance a lamentable tendency to treat students as consumers who are simply ‘consuming’ HE and can expect a particular outcome, rather than as independent learners who must strive to take advantage of all the educational opportunities open to them and be accountable for their own progress. We must not remove responsibility from young adults for learning for themselves, managing their own progress and meeting expectations.
* Thirdly and relatedly, when a focus on outcomes is coupled with a demand for ‘continuous improvement’ (para 41(e)), this is an obvious recipe for grade inflation, despite HEFCE’s stated wish to tackle this problem (para 79). As HEFCE acknowledges, 47% of HEIs have changed their degree classification algorithms to ‘ensure that their students were not disadvantaged compared to those in other institutions’ (para 101). That is, they have felt pressure to converge on the grade-inflating practices of other HEIs. However, these pressures are actually intensified by HEFCE’s proposals to intervene against an HEI when its outcomes data are ‘consistently below the performance of its peer group’ (para 51), and to create mechanisms that force external and internal examiners to ‘calibrate’ grades across the sector (para 90). This would add the fear of external intervention and peer pressure to existing (and escalating) ‘student expectations’ that their payment of fees should generate a particular qualification.[[7]](#footnote-7) These pressures would make it difficult or impossible for individual universities to hold out against grade inflation. It is also important to note that it is often so-called ‘elite’ universities – where QA would seem to be on firm ground – where grade inflation is most endemic.[[8]](#footnote-8) Finally, the problem of grade inflation obviously further invalidates the use of student attainment as a metric of good teaching, because the gap between a student’s qualifications at entry and exit is not a reliable indicator of the intellectual distance travelled. So-called ‘value added’ could only be measured (if at all) by holding purpose-made exams for students at entry and exit. Again this would undermine HEI autonomy, innovation and experimentation – and indeed educational quality – by encouraging teaching to the test, as is now endemic in UK secondary education.
* Fourthly, as is well understood in the literature on pedagogy and the traditions of UK HE, higher education is not simply about producing students with degrees but more fundamentally about promoting a range of lifelong skills and qualities within students, including independent critical thinking, self-organisation, community service, knowledge of national and international processes and developments and so on, which are difficult if not impossible to capture through the notion of ‘student outcomes’. By fixing assessments of teaching quality to measurable numerical outcomes, HEIs and teachers will be strongly incentivised to spend less time and effort on these wider social goods and skills for their students. This will lead to a narrowing of the pedagogic mission within public universities.
* Finally, there are particular dangers relating to what specific indicators are taken as ‘student outcomes’. Indicators such as graduate earnings have been suggested, but these are highly inappropriate as proxies for teaching quality in a public higher education system. Comparing the salaries of, say, primary school teachers and commercial lawyers says virtually nothing about the quality of the teaching which led to their employment, nor their respective contributions to society, and could potentially de-value subjects and disciplines where students are oriented towards less remunerative but socially important professions. We have already seen moves in this direction with the introduction of Key Information Sets, and the ‘Future Employment and Earnings Record’ mooted by the 2014 Lord Young Review of Enterprise in Education. In these metrics, the foregrounding of average earnings from different degrees are intended to steer students towards remuneration rather than societal contribution. Lamentably, this has been coupled with the active discouragement of students from undertaking Arts degrees by the Education Secretary, Nicky Morgan.

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

No, for the reasons given in the response to Q7.

**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?

No, for the reasons given in the response to Q7.

**Question 10:** In Northern Ireland, do you agree with the approach outlined to introduce more effective and consistent arrangements for collecting and analysing feedback from higher education learners?

No response.

**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.

As noted in the response to Q2, there are good reasons to doubt the credentials of many governing bodies, as currently constituted, to adjudicate the quality of university education. The procedures suggested in this section of the proposals (and elsewhere) also give good reason to doubt that the regime would actually be any less onerous or burdensome than the existing QA regime, despite suggestions to the contrary.

* At the heart of the proposals is a shift from the 6-year ‘external review’ of programmes led by the Quality Assurance Agency to a supposedly ‘light touch’ regime whereby, after HEIs have achieved a baseline standard in their QA processes, certified by the funding body, their governing bodies would merely need to declare annually that the procedures so certified were being carried out appropriately (para 58). This is billed as reducing the burden and cost to HEIs.
* In practice, this shift would increase the burden and cost.
  + The five-year review – which is indeed very burdensome for the departments being scrutinised – would be replaced by annual reviews. This will spawn a whole new layer of internal QA bureaucracy, with rolling meetings to gather and scrutinise (and doubtless massage) the relevant data, formulate action plans to achieve ‘continuous improvement’, reviews of progress against action plans, etc. HEFCE even suggests the use of consultants by governing bodies, which could spawn reviews of reviews of reviews (para 62). What would appear *externally* as a ‘lighter touch’ – because the funders would be less directly involved – would actually manifest itself *internally* to HEIs as a far ‘heavier touch’.
  + The obvious parallel here is to the RAE/REF, where the vast bulk of ‘regulation’ occurs not *between* the funding bodies and the HEIs, but rather *within the HEIs themselves* in response to the funders’ meta-governance regime. Thus, the 2014 REF is (conservatively) estimated to have cost HEFCE only £14m, but HEIs spent £230m on the constant meetings, dry runs, modelling, etc, designed to game the system.
  + There is no reason to expect this would not be duplicated in a metrics-driven QA regime. HEFCE notes that internal QA already involves ‘substantial cost’ to HEIs (estimated at £1.1bn annually, 8% of teaching budgets);[[9]](#footnote-9) but it blames ‘quality practitioners’ for ‘adopting a risk-averse approach’ and says it would encourage managers to prevent this. This is, at best, disingenuous: the regulated are being blamed for the burdens of externally imposed regulation. In reality, as HEFCE knows full well, in a ‘marketised’ HE system, the reputational consequences of any failure to comply with the UK’s extraordinarily bureaucratic and burdensome regulations are potentially disastrous; it is this that breeds risk aversion and over-compliance, not quality practitioners’ personal excessive zeal. Nothing in the present proposals would change the structural incentives for over-compliance.
  + HEFCE also notes, and proposes to avoid, the risk that a five-yearly HEFCE Assurance Review could ‘grow into the burden of a new Higher Education Review’ (para 64, shaded box). Again, the example of the REF shows that bureaucratic and regulatory escalation is the norm. The first RAE (in 1986) required departments to submit five pieces of research and four pages of general description; the 2014 REF required four pieces of research per academic, plus an environment statement, an impact statement, and impact case studies. Unsurprisingly, just between 2008 and 2014 the cost of the RAE/REF increased 372%.[[10]](#footnote-10) The present proposals offer no suggestions on how to prevent similar expansion in the QA regime.

**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?

See response to Q11.

**Question 13:** For Northern Ireland, do you agree that DEL should develop and use the existing accountability mechanisms in the ways described?

No response.

**Question 14:** Do you agree that there should be a ‘probationary period’ for new entrants to the publicly funded sector in England?

See response to Q5.

**Question 15:** Do you agree that international activities should be included in the remit of future quality assessment arrangements as described?

International activities should be subject to the same QA processes as domestic activities, to prevent UK-accredited HEIs offering low-quality programmes overseas.

**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?

As noted in the response to Q1, there is a deep and insoluble contradiction between the demand for ‘reasonable comparability’ and the abandonment of a ‘one size fits all’ approach to quality. One can either promote comparability, by cleaving to a very firm and traditional notion of what must be involved for a university education to be considered legitimate, and demand that all providers converge around it; or one can promote multiple tiers of ‘quality’, which makes comparability impossible.

Moreover, the notion that this circle can somehow be squared by a well designed QA system is fanciful. There are obvious reasons for the non-comparability of qualifications across existing HEIs, before new low-quality providers are ushered into the market. Key among these are differences in students’ abilities. Average UCAS entry tariffs vary widely, from 559 (nearly 5As at A level) at Cambridge to 187 at Bedfordshire (three Ds). Clearly, students with such A level profiles do not have the same academic potential at degree level. Yet the proportion of Firsts, Upper Seconds, etc, does not vary anything near as widely across HEIs. This is because examiners already grade relative to the university’s mission and student profile. Consequently it is well understood that a 2(i) from Cambridge is not the same as a 2(i) from Bedfordshire.[[11]](#footnote-11) The notion of ‘broad comparability’ is already a nonsense in the massified UK HE context; it can only become more so if the notion of ‘quality’ is relaxed (see response to Q3).

**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?

No. See response to Q2.

**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?

As stated in the response to Q2, there is no suggestion that the current system of external examining fails to provide necessary assurances.

**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?

No, for several reasons.

* First, the objective of comparability between degrees is problematic as described in the response to Q16.
* Secondly, the proposals again involve ever greater bureaucracy and compliance costs, despite promises of a ‘light touch’. It is suggested that professional standards bodies and subject associations essentially become disciplinary regulators . It is also suggested that internal and external examiners, in addition to their existing responsibilities, should work together to calibrate grades across disciplines by comparing students’ work. Again, this would significantly increase regulation rather than decreasing it; any impression of a ‘light touch’ is merely obtained through the displacement of regulatory activity away from the funding bodies.
* Thirdly, the proposals are deeply unrealistic. It is implied that academics can easily come to agreement on shared standards by comparing their students’ work and achievements (para 90). In reality this would be very difficult, if not impossible, particularly in Arts, Humanities and Social Science subjects where assessed work often relies heavily upon interpretation and syllabi, modes of assessment and intended learning outcomes vary widely from department to department. To take a simple example, a Politics department dominated by academics working in mainstream approaches is likely to have very different expectations of student work to one where staff work overwhelmingly using critical approaches. What ‘counts’ as high quality work will consequently differ substantially. Often, there can be serious disagreements over marks awarded to a single piece of work between two colleagues in the same department. What the simplistic notion of calibration overlooks is that the process of grading interpretive work is itself always interpretive. There may be ‘fuzzy’ shared notions of what constitutes ‘good’ work, but there is always bound to be substantial variation. Robust internal and external examining practices exist to ensure that these variations are resolved fairly and consistently. They do not seek the impossible task of eliminating them entirely. Even if this were possible, it would not be desirable, since it would reduce diversity and experimentation across HEIs by promoting conformity to disciplinary norms. This is at odds with the proposals’ stated aim not to suppress HEIs’ autonomy, innovation and experimentation. It is also at odds with basic principles of academic freedom.

**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?

As noted in the response to Q19, this would increase and displace rather than reducing the total regulatory burden. We might also question whether PSRBs would be willing to adopt such a role – and at what cost. Inevitably, fee-paying students would end up financing the increased regulation.

**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?

See responses to questions above.

**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?

In principle, harmonisation is not a bad idea, though it is unclear why the focus should be exclusively on the pass/fail and 2i/2ii borderlines, since other borderlines are also important. However, it is misguided to believe that this is a magic bullet for solving grade inflation, as implied here (para 100-101). If the algorithms for degree classification were altered to reduce departments’ capacity to upgrade borderline students from 2ii to 2i, the structural pressures towards grade inflation (discussed above and potentially exacerbated by HEFCE’s proposals) would simply compel alternative methods towards the same end, e.g. the avoidance of awarding borderline marks in the first instance. It is also the case that the use of algorithms to determine students’ classifications has vastly reduced the role for internal and external examiners in reviewing and upholding standards, since all classifications are determined prior to Examination Board meetings and there is no role for expert judgement or discretion.

**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?

See response to Q2. There must be safeguards put in place to protect HEIs from unnecessary/ politicised interventions. This would involve, among other things, precisely specifying vague terms like ‘an indication’, ‘serious’, ‘satisfactory’, ‘timely’, etc.

**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?

Only if the investigation shows that the concern is founded and serious enough to cast doubt on the maintenance of baseline quality standards.

**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?

Yes. In the case of private providers it would be important to ensure that the peer review process is led by the scholarly community and not some sort of independent, private inspectorate.

**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?

It is not immediately clear why HEFCE would move now towards a detailed design phase when the government’s proposed TEF remains so unclear. There is the clear risk that whatever HEFCE does now could soon be superseded.

**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?

N/A

**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?

N/A

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1. Joanna Williams, ‘The National Student Survey Should be Abolished Before it Does Any More Harm’, *The Guardian*, 13 August 2015, available at http://www.theguardian.com/higher-education-network/2015/aug/13/the-national-student-survey-should-be-abolished-before-it-does-any-more-harm. [↑](#footnote-ref-1)
2. See Jacqueline Baxter, ‘Policy Briefing: Trojan Horse, the Media and the OFSTED Inspectorate’, *Discover Society*, 1 July 2014, available at http://discoversociety.org/2014/07/01/policy-briefing-trojan-horse-the-media-and-the-ofsted-inspectorate-2/. [↑](#footnote-ref-2)
3. See United States Senate Health, Education, Labour and Pensions Committee, *For Profit Higher Education: The Failure to Safeguard the Federal Investment and Ensure Student Success*, 30 July 2012, available at <http://www.help.senate.gov/imo/media/for_profit_report/PartI-PartIII-SelectedAppendixes.pdf>; Andrew McGettigan, *The Great University Gamble: Money, Markets and the Future of Higher Education* (London: Pluto, 2013), ch. 7; Andrew McGettigan, ‘Private Providers: Market Creation Out of Control’, 18 November 2013, available at http://andrewmcgettigan.org/2013/11/18/private-providers-market-creation-out-of-control/. [↑](#footnote-ref-3)
4. The evidence base is enormous. Some of the most influential works include: J.A. Goldthorpe, ‘Class Analysis and the Reorientation of Class Theory: The Case of Persisting Differentials in Educational Attainment’, *British Journal of Sociology* 47, 3 (1996): 481-505; Annette Lareau, *Home Advantage: Social Class and Parental Intervention in Elementary Education* (Lanham: Rowman and Littlefield, 2000); Alice Sullivan, ‘Cultural Capital and Educational Attainment’, *Sociology* 35, 4 (2001): 893-912. [↑](#footnote-ref-4)
5. See the classic study, Mark Granovetter, *Getting a Job: A Study of Contacts and Careers* (Chicago: University of Chicago Press, 1974/1995) and, most recently, Social Mobility and Child Poverty Commission, *A Qualitative Evaluation of Non-Educational Barriers to the Elite Professions*, June 2015; available at https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/434791/A\_qualitative\_evaluation\_of\_non-educational\_barriers\_to\_the\_elite\_professions.pdf. For a general discussion of why graduate destinations cannot serve as a proxy measure for teaching quality, see https://academicirregularities.wordpress.com/2015/07/28/how-not-to-measure-teaching-quality-and-learning-gain/. [↑](#footnote-ref-5)
6. John Holmwood, ‘Code of Practice Needed to Prevent Degree-Course Mis-selling’, *Research Blogs*, 7 February 2011; available at http://exquisitelife.researchresearch.com/exquisite\_life/2011/02/code-of-practice-needed-to-halt-degree-course-mis-selling-.html. [↑](#footnote-ref-6)
7. Several students have sued their universities for ‘failing’ them in this regard. By 2011 there were six cases in Scotland alone. In one case, the University of Wolverhampton paid £30,000 to a student in an out-of-court settlement. ‘Students Sue Universities for Higher Grades’, *The Scotsman*, 26 March 2011. [↑](#footnote-ref-7)
8. In the US case, see Stuart Rojstaczer and Christopher Healy, ‘Where A is Ordinary: The Evolution of American College and University Grading, 1940-2009’, *Teachers College Record* 114, 7 (2012): 1-123. [↑](#footnote-ref-8)
9. ‘Quality Assurance Burden £1bn, Says Study’, *Times Higher Education*, 30 June 2015. [↑](#footnote-ref-9)
10. ‘REF 2014 Cost Almost £250 Million’, *Times Higher Education*, 13 July 2015. [↑](#footnote-ref-10)
11. That said, it should not be assumed that post-1992 HEIs with lower entry requirements necessarily offer poorer teaching. The evidence suggests that many provide better student engagement than many Russell Group institutions, but do more poorly in metrics like the NSS – another example of quantitative metrics merely replicating existing social hierarchies. See Monica McLean, Andrea Abbas and Paul Ashwin, ‘The Use and Value of Bernstein’s Work in Studying (In)equalities in Undergraduate Social Science Education’, *British Journal of Sociology of Education* 34, 2 (2013): 262-280. [↑](#footnote-ref-11)