



22<sup>nd</sup> July 2010

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

### **A discussion paper from UniversitiesUK, GuildHE and the Quality Assurance Agency for Higher Education**

This discussion paper sets out some initial proposals for strengthening external examining arrangements across higher education provision in the UK. The proposals have been developed by a UniversitiesUK/GuildHE joint Review Group in collaboration with the Quality Assurance Agency for Higher Education. Responses to the discussion paper will feed into the development of final recommendations which the Review Group will make to the sector in December 2010.

We would welcome any and all responses to these initial proposals from Universities, Colleges of Higher Education, other institutions with degree awarding powers and more widely including students and further education colleges delivering higher education. We would especially welcome responses submitted by email with attachments or via the webpage.

Responses can be emailed to [Greg.Wade@UniversitiesUK.ac.uk](mailto:Greg.Wade@UniversitiesUK.ac.uk) or [Helen.Bowles@GuildHE.ac.uk](mailto:Helen.Bowles@GuildHE.ac.uk)

Online responses can be completed at <http://www.universitiesuk.ac.uk/ExternalExaminers>

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The deadline for responses is **Friday 1 October 2010**.

## **Foreword**

I am pleased to be able to commend this discussion document on external examining in the UK higher education system. I would like to encourage comments from a wide range of individuals and organisations who have an interest in the topic.

Many interested parties need to have confidence that a degree or diploma from a UK University or College meets the high standards traditionally associated with a UK award. Students, whether from the UK or from overseas, commit time and energy to achieving their qualification; they also pay towards it through fees or a graduate contribution. They, as well as their families, their present and future employers and the general public, all have a right to expect that the standard of their qualification is appropriate and secure.

External examining plays an important part in the security of standards across the UK system. As in many other countries, individual Universities, Colleges of Higher Education which have degree awarding powers and other institutions with degree awarding powers are fully responsible in law for setting the standards of their awards, and for assessing students to determine whether they have met those standards. There is no overarching standard-setting or examining agency for higher education qualifications. However the UK has a distinctive system of external examining which is an invaluable safeguard. This involves each institution appointing experienced people who participate in the assessment process, and whose key role is to be an independent check on the process of assessing students and to provide professional advice. They also comment on the appropriateness of the standards in the context of national qualification frameworks, standards within the subject across the UK and standards in other institutions of which they have experience. The advice that they give, and the opportunity external examining provides for sharing best practice between institutions, contributes to the improvement and development of assessment across the UK.

The external examining system is one of the means by which the UK higher education system, as a whole, takes collective responsibility for standards, and ensures that they are broadly comparable across the whole system, not equal or identical, but broadly comparable. With such a large and diverse Higher Education sector in the UK, different missions, priorities, subject focus and infrastructure enable the sector to meet the various needs of different types of students. This is a great strength of Higher Education in the UK and is combined with a flexible, comprehensive and rigorous approach to quality and standards.

Whilst this Review focuses specifically on external examining it is important to recognise the other processes that support quality and standards. Universities, and colleges, whether they have degree awarding powers or not, have additional ways in which they safeguard and review the setting and maintaining of standards such as internal procedures, implementation of the guidance outlined in the Academic Infrastructure (consisting of the Code of Practice, Subject Benchmark Statements, Programme Specifications and Frameworks for Higher Education Qualifications) maintained by the Quality Assurance Agency for Higher Education (QAA) independent, external audit/review by the QAA and the requirements of Professional, Statutory and Regulatory Bodies (PSRBs). External examining operates within this wider context and complements and supports these other processes.

Our Review was established because questions had been raised, in Parliament and elsewhere, about whether this system is working effectively and is consistent enough across Higher Education. It is also right that a process that is an important contributor to maintaining standards should be subject to periodic scrutiny. This Review is a demonstration of the importance that the sector attaches to the external examining system.

There are common themes running through this discussion paper. We believe that it is essential to recognise that the autonomy of individual Universities and other higher education institutions is one of the key strengths of the UK higher education system. It is equally important to recognise the value of having an effective, consistent and transparent external examining system which secures the appropriateness and comparability of standards within each institution across the whole sector. We believe that, whilst it works well in many ways, now is the appropriate time to strengthen the system by creating greater consistency in external examining processes across the UK and this paper includes proposals to achieve that. These initial proposals would have the effect of setting UK-wide processes and protocols for the operation of the system. We believe that this would have the effect of creating a more comprehensive and transparent system, as well as a more consistent one, which in turn would secure greater public confidence.

We have been very encouraged by the willingness of Universities, Colleges of Higher Education and other institutions who have degree awarding powers to consider and discuss in an open and positive way how external examining arrangements can be developed and improved. I am also personally grateful for the support and help given by colleagues in institutions, agencies and other organisations to this Review. This discussion paper is intended to allow wide comment on initial proposals at an early stage so that those with an interest in maintaining high academic standards in higher education in the UK can influence the final recommendations of the Review which will be published at the end of 2010. We look forward to receiving your responses.

Dame Janet Finch  
Chair of the External Examining Review Group

## **Executive Summary**

The Review of the external examining system being undertaken by UniversitiesUK and GuildHE with the support of the Quality Assurance Agency and others, aims to consider how the current robust arrangements for external examining can be maintained in the future, ensuring public confidence in the responsibility of the UK HE sector for academic standards.

The scope of the Review is wide so as to encompass the range of issues raised in various reports over the last two years. This discussion paper addresses: selection, role, induction, training, recognition, reporting, and the raising of concerns. The paper outlines a number of suggested key principles to inform the development of external examining arrangements and outlines a range of questions relating to proposals under each section.

The Review Group has considered the recent concerns raised and criticisms made of external examining as well as the detailed investigations conducted into these by HEFCE and QAA. Any concerns raised about such an important part of the UK arrangements for the assurance of academic standards need to be considered seriously and in the context of evidence. It is clear to the Review Group that there is considerable evidence of external examining being operated in a robust and effective way across the HE sector. Where the Review considers there to be scope for improvement is in the consistency of external examining processes across the UK so that students and other stakeholders can have clear and confident expectations of how the core external examining process will work in every institution and that institutions are able to demonstrate this in an effective and transparent way.

To achieve this the discussion paper proposes:

- Principles to inform the strengthening of external examining arrangements that recognise both the strengths of current arrangements and the importance of clear and consistent arrangements that are effectively communicated
- A structure for the minimum expectations for the role of external examiners that outlines the judgements all external examiners should make and the advice that they should provide
- Developing national criteria for the appointment of external examiners that build upon existing institutional practice to provide enhanced transparency and confidence

- Ensuring improved transparency about the appointment processes for external examiners
- All institutions providing induction and training, possibly drawing upon a common core programme
- All institutions demonstrating the importance of external examining in terms of recognition and support for their own staff who act as external examiners for other institutions
- A national template for reports so that students and wider stakeholders can be assured that all external examiners address certain key issues in every institution, including a section aimed specifically at students
- Clear processes for external examiners to raise concerns about assessment or the operation of external examining, including the adoption of the QAA Causes for Concern process when an external examiner is not satisfied with the response from the institution

## **Background and Introduction**

1. The Review of External Examining was established by UniversitiesUK and GuildHE in response to a specific recommendation in the Higher Education Funding Council for England (HEFCE) Teaching Quality and Student Experience (TQSE) sub-committee report on HEFCE's statutory responsibility for quality assurance (HEFCE 2009/40). Although the report expressed confidence in the external examining system it also called for a full review to ensure that it was able to meet future challenges. The full recommendations are outlined in Annex A. Whilst the HEFCE review related to HE in England, the external examining process is UK-wide and the issues that the report raised had implications across the UK. Consequently this Review is encompassing the whole of the UK and this is reflected in the membership of the Review Group, and the supporting Expert Group (see Annex B).
2. The HEFCE review was undertaken in response to issues raised by reports produced by the QAA and in response to wider concerns and issues raised publicly by Parliament (House of Commons Innovation, Universities, Science and Skill Select Committee Report, Annex C) and echoed by the NUS (NUS Quality Matters, Annex D). The Select Committee Report was critical of external examining arrangements. Like other bodies who have commented on the report since, including the previous government in its Framework Document, we do not recognise the report as an accurate description of current practice across the sector where there is clear evidence of well developed good practice. However although we disagree with the scale of the problems identified by the Report and the proposed solutions, the

principles of increased consistency and transparency are ones that the Review Group clearly supports and seeks to address in this discussion paper.

3. The Review has been established with the involvement of the QAA, the Higher Education Academy (HEA), the National Union of Students (NUS) and the Association of Colleges (AOC) and is supported by experts drawn from across the UK and across the wide diversity of Universities, Colleges of Higher Education and other institutions with degree awarding powers as well as further education. The key purpose of the review is to:

“Consider and recommend what improvements need to be made to ensure that external examiner arrangements effectively support the comparability of academic standards and are robust enough to meet future challenges.”

4. The scope of the Review is outlined in Annex E. The Review will make recommendations to UniversitiesUK, GuildHE and QAA in December 2010. The Review relates only to external examining arrangements for undergraduate and taught postgraduate degrees, not postgraduate research degrees.
5. The Review is also working in close collaboration with the QAA's own initiative to develop “minimum expectations” for the role of external examiners which was an outcome of the Thematic Enquiries Report (QAA April 2009). Given that many of the issues being addressed by the Review are closely linked to the role of the external examiner the QAA's initial thoughts on the development of minimum expectations for the role of external examiners are incorporated in this discussion paper.
6. The Review Group considered the scale of external examining in the UK. Although there is no comprehensive figure for the total number of external examiners in the UK, during the course of our work we gathered examples from members of our Expert Group which indicated that there can be over 100, and in one case over 200, external examiners for a medium sized institution. This leads to an estimate of several thousand external examiners serving in the UK system at any given point in time. These external examiners are drawn from a wide range of different institutions and some members of the Expert Group indicated that, within their own institutions, external examiners came from over 80 other institutions. This clearly indicates the considerable time and effort the sector commits to external examining. External examiners are also drawn from a wider pool than just academic staff and include appointments from business, industry and the professions for programmes with a strong vocational orientation.

7. External examiners are appointed for all higher education programmes wherever or however they are delivered. This includes programmes delivered in universities and colleges of higher education, higher education programmes delivered in further education colleges and programmes delivered through distance learning or through overseas franchise arrangements where they lead to the award of a recognised UK awarding body. There are also now a number of private providers of higher education that have been granted the powers to award their own degrees.
  
8. Where the institution delivering the programme is not the awarding institution, responsibility for the maintenance of standards - and thus responsibility for the appointment and functions of external examiners – continues to rest with the awarding institution. Depending on the terms of the partnership agreement, the awarding institution may choose to delegate arrangements for the recruitment, selection and appointment of external examiners to the institution delivering the programme – but only when they are fully satisfied that it is safe to do so. (See Code of Practice for the Assurance of Academic Quality and Standards, Section 4 referring to external examining and Section 2 referring to collaborative provision.) In this document reference is made throughout to ‘universities and other institutions with degree awarding powers’. This reference covers the universities and the publicly funded higher education institutions which have been granted the powers to award their own degrees but which do not hold university title. It also includes, where relevant, the private providers holding degree awarding powers which are required to subscribe to the QAA and work within that context. We have opted for this approach in recognition of the fact that responsibility for standards rests ultimately with the awarding institution. However, in doing so, we recognise the roles and responsibilities that pertain to those Colleges of Higher Education which do not hold degree awarding powers. As higher education institutions in their own right, they are expected to work within the context of the Academic Infrastructure and are subject to institutional audit by the QAA.
  
9. It is clear from the discussions that the Review Group has had, and the evidence that it has considered, that on the whole there are strong common procedures for external examining and considerable, well developed good practice. Some of the strengths of external examining arrangements include:
  - The professional dedication and expertise of external examiners as part of a peer review approach
  - The sharing of good practice and advice that is inherent in a peer review approach
  - The respect and seriousness with which institutions consider the comments of external examiners
  - The rigour with which institutions operate their external examining arrangements

- The embedding in institutional processes of key elements of the QAA Code of Practice for the assurance of academic quality and standards in higher education, specifically Section 4 on External Examining
10. According to recent evaluations of external examining, particularly by the QAA, UK universities and institutions with degree awarding powers have a track record of robust and effective procedures for appointing, supporting and responding to external examiners. The combination of institutional responsibility for academic standards underpinned by a national code of practice and tested through institutional review processes has worked well.
  11. Despite these strengths, concerns have been raised about external examining arrangements, especially in relation to consistency, transparency and complexity. One solution that has been proposed is to set up national structures for external examining involving an external examiners “register” combined with a national training programme and possibly national pay rates with an independent body making payments. We believe that these suggestions would involve considerable time and bureaucracy, cut across institutional autonomy and could undermine peer review. The small scale and isolated nature of the problems identified so far do not warrant such developments.
  12. However, confidence in the quality and standards of UK degrees is rightly a matter of public interest. It is important therefore to ensure that procedures such as external examining are as robust and consistent as possible across the whole system, and that the way in which they operate is transparent and well communicated. Students on any programme in any institution should have a clear understanding of the role of the external examiner and they should be able to have clear expectations as to the common processes and safeguards that institutions will operate in relation to external examining. This in turn should provide greater assurance that HE programmes meet the threshold standards contained in the qualifications frameworks and are broadly comparable. External examining arrangements are not nationally transparent, not well understood beyond the higher education sector and the common strengths of the system are not articulated effectively enough to ensure public confidence in the system. The recommendations in this discussion paper seek to address this.
  13. The responsibility that institutions have to ensure that there are rigorous academic standards in operation throughout the UK is one we know that institutions take very seriously indeed and our recommendations are intended to ensure that the contribution of external examiners to that responsibility is clear, transparent and consistent. Our proposals are intended to help the sector demonstrate the seriousness it attaches to academic standards and to establish a clear benchmark against which institutions can be judged. It has drawn upon: the responses to the consultation on the *Future arrangements for quality assurance in England and*

*Northern Ireland* (HEFCE 2009/47); the discussions held at the QAA round tables evaluating the academic infrastructure; discussion with a wide range of expert groups in the sector, including the learning and teaching committees for Scotland and Wales, and the wide experience and knowledge of the members of the Expert Group, to suggest improvements to external examining in the UK.

14. The Review Group is conscious that whilst it seeks to ensure greater consistency and transparency, any proposals will also need to recognise the diversity of higher education provision and the different backgrounds and roles of external examiners.

## **Section 1 – Principles to Inform the Development of External Examining Arrangements**

15. The consultation paper *Future arrangements for quality assurance in England and Northern Ireland* outlined a range of principles to inform the development of quality assurance in England and Northern Ireland. These principles were revised in the light of responses to the consultation and are summarised in Annex F (HEFCE 2010/17). The Review considers this to be a valuable statement of key principles that are equally applicable to this UK-wide Review. In addition to these principles we would add three specific principles to this Review which are outlined below.
16. In the UK, Universities and other institutions with degree awarding powers are legally autonomous bodies and have responsibility for ensuring provision is of high quality and that standards are maintained. This institutional responsibility means that there is no national curriculum for higher education. This has enabled a diverse range of programmes, responding to the needs of students, employers and society more widely, to be provided and is an essential part of a flexible, effective higher education system. However institutions do not act in isolation, they are held to account by the funding councils and the QAA for ensuring that there are rigorous mechanisms for the management of the security of the academic standards of awards and that they are using these mechanisms effectively and consistently. Institutions are held to account in the context of common guidelines that form part of the Academic Infrastructure, namely, qualifications frameworks, the Code of Practice, Subject Benchmarks and Programme Specifications.

17. Another important safeguard in the UK system is the role of Professional, Statutory and Regulatory Bodies (PSRBs). Individual courses that lead to a professional or vocational qualification, or exemption from a professional examination, are usually accredited by a professional, statutory or regulatory body (PSRB). Given examples from the members of the Expert Group, the number of courses delivered by institutions that have some PSRB input into quality and standards can reach as high as 70%. It is important for there to be recognition of the role PSRBs play in the UK system of quality assurance and that any development of external examining arrangements will need to be compatible with their requirements. However, we do not make any specific recommendations in relation to PSRBs. The role of PSRBs is discussed in more detail in Annex H.

**Principle 1: In the UK system each institution has responsibility for setting the standards of its awards within the context of common guidelines, and subject to audit/review by an independent agency. This should continue to be supported and strengthened. External examining is only one part, albeit a very important part, of this system.**

18. The QAA's Code of Practice, Section 4 on External Examining, has been adopted across the UK HE sector as the basis for securing effective external examining in practice. The QAA Institutional Audit/Review process targets the external examining system for particular scrutiny recognising the importance of the process as a key area for the effective operation of academic standards. The QAA instructs external reviewers that where they find institutions failing to ensure that there is strong and scrupulous use of independent external examiners in summative assessment procedures this should be one of the key triggers for a judgment of limited confidence in the institution.

**Principle 2: Institutional Audit/Review is an important mechanism for testing whether external examining is working in practice and external examining arrangements should remain one of the key areas for Institutional Audit/Review and a critical system in determining the outcome of Institutional Audit/Review.**

19. Given that external examiners are one of the safeguards for academic standards in the sector it is important that students and wider stakeholders can both understand and have confidence in the arrangements. Confidence in the arrangements will come from more consistency, which will itself aid explanation and communication about the role of external examiners. Because it is an unusual system, quite unlike the examination process at A level, for example, and because there is no readily

accessible explanation of it, it is not surprising that external examining often seems mystifying. As a result misunderstandings can arise where, for example, external examining may be expected to bear the full weight of securing academic standards without reference to the other key elements in the Academic Infrastructure and other rigorous internal processes. Without those also being effective, external examining on its own cannot guarantee standards.

20. Viewed from outside the sector, aspects of external examining may seem puzzling, even suspect. For example, variability and flexibility in the tasks undertaken by external examiners, whilst essential to support the needs of different subjects, can make it more difficult to explain to external audiences the core elements of the process and provide reassurance on the comprehensiveness and effectiveness of external examining. Similarly the preponderance of external examiners drawn from within the HE sector, necessary because subject expertise is essential to the task and an integral part of peer review, can sometimes appear to be “too cosy”. This has led to concerns being raised about the independence of external examiners and whether external examiners are sufficiently challenging. If it is unclear who the external examiners are and how they were appointed this can exacerbate these concerns.
21. It is plainly the responsibility of the sector itself to address these public concerns, by articulating and communicating the role of external examining and providing evidence about its operation in practice more effectively. Codifying these responsibilities more clearly in a set of national expectations, rather than guidelines, backed by common core templates and criteria would enable the sector to describe external examining more clearly and reassure other interested parties more effectively without constraining the flexibility needed to satisfy the needs of different subjects or compromising institutional autonomy.

**Principle 3: More should be done to articulate, explain and promote the role of the external examiner. More nationally consistent, developed and supported external examining expectations would improve the effectiveness, transparency and credibility of the system, especially with external audiences.**

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

## **Section 2 - Role**

22. Clear identification and understanding of the role of the external examiner will be a key element of any attempt to develop more consistent, UK-wide external examining arrangements. The role also underpins recruitment, selection, training, induction and reporting.

23. The QAA is currently developing a set of “minimum expectations” for the role of the external examiner building upon the current Code of Practice to support greater consistency and transparency. The QAA is also currently undertaking a wider review of the Academic Infrastructure and has engaged with the sector on both the possibility of minimum expectations for external examiners and the Academic Infrastructure. The Review Group and QAA have worked in close collaboration, jointly supporting consultation conferences and sharing feedback from the sector. The Review Group considers the work of the QAA on the role of external examiners as complementary to its desire for more consistency and transparency in wider external examining arrangements.
24. The QAA will be taking forward the detailed development of the minimum expectations as part of the development of the Academic Infrastructure but, given the importance of this development to the work of the Review and the fact that this discussion paper is an opportunity to test initial thoughts and proposals with the sector, current QAA thinking is included in this section.
25. The current section 4 of the QAA Code of Practice outlines the main purposes of external examining and details in the first precept what universities and other institutions with degree awarding powers should ask external examiners to report on (see Annex I). Reviewing the evidence of institutional practice and audit/review reports the QAA has found that almost all institutions have defined the roles of their external examiners drawing upon the relevant section of the Code of Practice and taking into account the needs of the institution and subject. Institutions clearly outline the role of the external examiner in their selection criteria and the role is incorporated into internal regulations and procedures.
26. The Review Group, through the experience of the Expert Group and in discussion with professional networks in HE, confirm this widespread good practice. This evidence gives the Review Group confidence that there is a firm foundation of good practice in institutions that can be used to develop more consistent practice across the sector and clearer expectations for students and stakeholders.
27. Given the wide range of programmes, subjects and assessment methods it is both appropriate and necessary for there to be some flexibility in the role of external examiners. Neither the Code of Practice nor the development of minimum expectations are intended to constrain or restrict institutional practice where that is necessary for the particular features of a programme or for the needs of a particular subject.

28. Any introduction of minimum expectations will also need to take into account the impact of modularisation which has necessitated changes in the roles of external examiners with many institutions now operating a “two-tier” system comprising of both a specific module external examiner and a programme external examiner, who focuses on the integrity of the programme as a whole.
29. External examiners also often work as part of a team to ensure adequate subject coverage for a large programme or group of programmes.
30. The minimum expectations of the external examiner will need to be clear enough to be meaningful to the sector and stakeholders, broad enough to encompass the different roles external examiners fulfil and flexible enough to allow for appropriate variety to meet the needs of different subjects, including the use of teams of external examiners. This section provides an initial view, drawing upon the comments and feedback the QAA has received from the sector so far, on what shape the minimum expectations might take.

#### Developing the Role of External Examiners

31. The QAA's consultations to date have reinforced the view that the principal role of the external examiner relates to contributing to the *maintenance* of academic standards, providing independent subject-based expertise and making informed judgements. The *setting* of standards is a matter for the awarding institution, making appropriate use of the Academic Infrastructure including the framework for higher education qualifications in England, Wales and Northern Ireland or the framework for qualifications of higher education institutions in Scotland, and other forms of externality, such as PSRBs. This distinction between the setting and maintenance of standards has implications for the role and limitations of the powers of external examiners. Feedback also confirms the importance of making clear that the external examiner does not, on the whole, get involved in the examining and assessment of individual students, they are a check and also an adviser on how the institution has conducted assessments.
32. External examiners are also increasingly playing a more advisory role in relation to departmental processes and procedures. It might be argued that different terminology is appropriate according to which aspect of the role is being fulfilled. Comment on the appropriateness of academic standards might be properly categorised as a judgement, especially in the rare cases where the external has concerns about those standards. Contributing to the development of the provision – the ‘critical friend’ type role – a key part of a peer review approach, might be more appropriately characterised as ‘advice’. The initial ideas for the minimum expectations make some attempt to adopt this terminology, although of course external examiners can clarify and support a judgement with advice.

## Initial Ideas for Minimum Expectations for the Role of the External Examiner

### Academic Standards - Achievement of standards

- Through sampling student output from summative assessment tasks external examiners judge whether standards achieved are appropriate
- The external examiner may advise that the student cohort be re-marked

### Academic Standards - Fairness and rigour

The external examiner can offer an independent judgement of whether the assessment process (broadly defined) has been conducted fairly and rigorously, potentially embracing such issues as:

- Whether the grading criteria (or equivalent) have been properly applied
- Whether the institution's relevant policies, for example, on providing feedback to students, have been properly applied
- Whether the institution's regulations governing the weighting of assessment tasks and modules within the programme have been applied properly
- Whether due and similar treatment has been given to individual cases, especially those on a borderline
- Whether the institution's regulations governing mitigating circumstances and plagiarism have been applied appropriately and fairly
- Offering advice where any problems are identified

### Academic Standards - Comparability of Standards

Making a judgement on the extent to which the standards achieved by students are comparable:

- Across the modules within a specific programme
- Across programmes within the same subject in the institution in question, for which they are external examiners
- Across programmes within the same subject in other institutions of which the external examiner has experience
- All of these over time

### Academic Standards - Alignment of outcomes

- At programme level: making a judgement on the continued alignment of the programme to the threshold standards indicated by qualifications frameworks

- At module level: making a judgement on the continued alignment of modules to the programme
- Providing advice where there are concerns about alignment

### Reporting to Students

The report to students which is suggested in section 6 could include:

- A brief summary of comments in the rest of the report that might be of particular interest to students
- Strengths/weaknesses of the programme/course
- Methods of teaching (judging by standards achieved by students)
- Methods of assessment
- Standard of the student performance

### Comparability of Standards

33. It is the mechanisms and processes that support the comparability of academic standards which makes it possible to refer to “a UK degree” and is one of the features which makes UK higher education attractive internationally. We recognise that there has been considerable public interest in the role of external examining in ensuring comparability of academic standards. The issue of comparability of standards can be considered in many ways, for example, whether minimum threshold standards for a degree are comparable or whether specific grades are comparable. UniversitiesUK has recently produced a policy statement on standards which emphasises the importance of ensuring both “broad comparability” and the flexibility of UK higher education to meet student needs (Annex J). The Review Group considers this to be a helpful statement on comparability of standards that outlines the contribution external examining makes.
34. The external examining system does indeed play a key role in ensuring comparability of academic standards. Currently institutions ask external examiners to comment on the appropriateness of academic standards in relation to their experience of other institutions and in relation to the threshold standards outlined in qualifications frameworks. However external examining does not bear the full weight of this within the UK system and needs to be considered in the wider context of internal institutional procedures (including initial programme validation, regular programme review and the examination process including Assessment and Examination Boards) and national guidance.

35. The forms of comparability identified in the minimum expectations leave some matters outside the remit of the external examiner. A subject-based examiner is unlikely to be able to take a view on the comparability of standards achieved across programmes beyond that subject. Therefore institutions themselves have the responsibility for comparing standards across the entirety of their provision – e.g. through an institutional level committee such as the Senate or other senior committee – both within one year and over time. Ideally, the outcomes from this process would be fed back to external examiners. Similarly it may be desirable for institutions to consider how they might compare the outcomes on their programmes with a wider range of programmes from other institutions such as through gathering published data.

**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?**

### **Section 3 - Selection of External Examiners**

36. One criticism of the operation of external examining in practice is that appointments to the role are made from amongst a common academic constituency where familiarity breeds cosiness. Thus, it has been argued, the system provides insufficient independence and challenge. The lack of transparency in the process has led some to argue for major changes in the appointments process, in particular the introduction of a national register of external examiners.
37. In practice institutions have clear criteria for the appointment of external examiners which are intended to provide safeguards against this. They include clear rules to ensure that the external examiner can provide a rigorous and independent check on how the institution is exercising its responsibility for academic standards. Such rules require time limits on how long someone can be an external examiner for a given programme, so that they do not become over-familiar with the institution, and also restrictions on departments “swapping” external examiners through reciprocal arrangements. Other rules can include limits on the number of external examiner appointments one individual can hold and consideration of the subject expertise that they bring to a team.
38. Normally external examiners work as part of a team of external examiners for a programme or group of programmes. This is a further source of professional support for external examiners and can reinforce their independence. Institutions will seek to ensure that as well as each external examiner fulfilling the core role the team of

external examiners brings together enough expertise to cover the range of subject areas within the programme.

39. Institutions have been found by the QAA to have adopted the guidance in the Code of Practice and have nomination and appointment processes that are explicit, ensuring that external examiners are competent and that conflicts of interest can be identified and resolved. There is widespread evidence of good practice in the sector that gives the Review confidence that it can make recommendations about these processes being made more transparent and that a UK-wide set of criteria can be developed.
40. In respect of the option of a national register, the Review Group believes that this would be needed if there was clear evidence of widespread failure or serious system-wide shortcomings. It has found no substantial evidence of such failings, for example, in the evidence collected in detail by the QAA. In the absence of evidence of major failings, it would be difficult to justify the cost and bureaucracy inherent in such a system.
41. The HEFCE TQSE Sub-Committee Report also took this view. It came to the conclusion that current arrangements are robust. The Report outlined concerns that a national register could undermine institutional autonomy, drive diversity out of the system, involve considerable cost and undermine participation by professional academic staff in the external examining process.
42. Notwithstanding our rejection of the idea of a national register, we do regard it as important that there should be some measures to strengthen the appointments process to provide additional reassurance to students and other stakeholders. It is important to the credibility of the external examining system for the sector to be able to demonstrate robust and transparent appointments processes so as to counter any accusations of nepotism or concerns about the ability of external examiners to provide an external check and where necessary, challenge an institution. It is essential that institutional processes produce external examiners demonstrably independent from the programme and from the institution, who are able to challenge and comment on the broad comparability of degree standards.
43. Being clear about how external examiners are appointed and building upon the common elements of existing institutional criteria to develop national criteria would be two ways to ensure more transparent and consistent processes. If the selection criteria are agreed and adopted by the sector, integrated into internal procedures and checked through external quality audit/review, then we believe that this would address the concerns driving calls for arguments in favour of a national register. If this process proves inadequate in ensuring a demonstrably robust external examining system then the need for a register should be considered further.

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

**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?**

#### **Section 4 - Induction and Training**

44. Variability of induction and training of external examiners has been raised with us as an issue during our discussions with the sector and by members of the Review Group. The QAA has found that overall, audit/review reports showed that institutions were providing satisfactory and timely briefing information for their external examiners and examples of good practice were identified where training programmes were provided for new external examiners to the institution. However, for external examining arrangements to function effectively, all institutions should ensure that the external examiners they appoint receive effective and relevant induction and training.
45. All institutions will need to provide an induction for external examiners who have been newly appointed to their institution so that they can familiarise themselves with the programme, department and institutional procedures, even experienced external examiners will need this induction. Once external examiners have been through their induction they will need to be kept up to date on any particular changes especially to regulations and procedures. For academic staff who are entirely new to external examining some initial training or development will be needed for them to understand and fulfil the role. Training can be conducted in a variety of ways other than just meeting or conferences, for example, institutions will often ensure that a new external examiner works alongside an experienced external examiner at the start of their role. Where there is a team of external examiners this can provide an opportunity for the most experienced external examiners to support the least experienced external examiners. Induction and training are highlighted in the section of the QAA Code of Practice. Institutions could consider making such training available to their own staff who want to become external examiners for other institutions.
46. It is clear that induction and training should be delivered in a variety of ways both to suit the needs of different subjects but also to take into account the limited time external examiners have to engage in training. However there is a clear responsibility on institutions to ensure that external examiners are suitable for their role and are aware of the needs and procedures of the institution which has appointed them. There is also a need for the sector to ensure that new external examiners are supported and developed.

47. If a more consistent approach to external examining is to be developed with certain core expectations and processes then induction and training need to both reflect and disseminate this development. Different ways of delivering training and induction should be considered to ensure the widest possible participation. Consideration might also be given to having a core programme and template for the induction and training of external examiners to ensure that any recommendations arising from the Review are fully integrated into institutional procedures. The Higher Education Academy and many of its subject centres are already supporting external examiners within subjects and this could be one source of support for induction and training. More coherent and comprehensive induction and training could raise the esteem of the role

**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?**

## **Section 5 - Recognition**

48. Anecdotal evidence was provided to the Review Group of some difficulties in finding appropriate external examiners for some programmes, given that external examining is time consuming and there are many pressures on the time of academic staff. Thus the recognition – or lack of it – which external examining attracts has been the subject of comment. There is some evidence that institutions have integrated recognition of service as an external examiner into the promotion procedures for their own staff. For a UK-wide system of peer review to work effectively it needs to be valued by all institutions, and staff must be encouraged to devote time to acting as external examiners for other institutions. It must be considered an important part of being an academic in a UK higher education institution and an expected contribution to the academic “health” of the subject, as well as a valuable learning and development opportunity for the external examiner.
49. The sector has rightly highlighted the value and importance of external examining to the maintenance of academic standards in UK higher education. It demonstrates the ability of autonomous institutions to effectively meet their responsibilities for ensuring and maintaining the academic standards of the awards that they make. We are of the view that more attention needs to be devoted by institutions to ensure that they are doing all that they can to support academic staff undertaking external examining.

50. The external examining role is undertaken on a cost-sharing basis. What this means is that institutions consider the time staff devote to being external examiners as a contribution to the maintenance of academic standards and the reputation of higher education across the UK as well as a valuable opportunity for professional development and networking for the individual external examiner. The role and the system is well established and many staff recognise it as an important part of their professional development and contribution to the profession. Institutions should ensure that they support and reinforce this integral part of the academic role.

**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?**

## **Section 6 – Reporting**

51. QAA has found that in most cases the contents of external examiners reports were consistent with the QAA code, providing comment on the assessment process and the standards of student achievement. Institutions have generally given the reports full and serious consideration and they featured prominently in institutions internal annual monitoring reports with almost all institutions using summaries or overviews of external examiners reports. Concerns in some cases were noted in terms of how, and how quickly institutions followed up on reports.
52. Both the Select Committee and the NUS have recommended that external examiners reports are published in their entirety. Several years ago, the English HE sector went through a period of making nationally available a summary statement from each individual external examiners report through the Teaching Quality Information initiative (TQI). Research carried out on behalf of the Quality Assurance Framework Review Group showed that in practice the reports, which were published on the then TQI website, were little used and of little interest to a wider public audience. It was agreed that the practice of publishing the summaries be discontinued on the grounds that the level of interest did not justify the time and cost involved.

53. We are not recommending the publishing of external examiners reports in full as this could involve considerable time and cost to the sector, at a time of severe financial constraints and there are greater priorities in terms of supporting and developing the external examiner system. We also do not believe that the external examiners reports are primarily written for students or external audiences, they are primarily a tool to help the institution safeguard academic standards and support the effectiveness of the assessment process.
54. However, given the widespread lack of understanding of the role of external examiners amongst students it is in the interest of institutions to be transparent about how external examiners reports are followed up within the institution and to share, as a matter of routine, any analysis and follow up actions with student representatives. In recommending that the public reporting of summaries should end, the Quality Assurance Framework Review Group recommended that institutions in England and Northern Ireland should share the full reports with student representatives (HEFCE 2006/45 Review of the Quality Assurance Framework – Phase Two Outcomes). We warmly endorse this.
55. In terms of the availability of information, rather than publish whole reports or make these routinely available to all students, we believe that a more effective approach would be to develop a national reporting template which would also include a specific section written by the external examiner for students, developed in collaboration with the NUS.
56. Almost all institutions ask a common set of key questions to external examiners and the Review Group believes that these should be translated into a common template for external examiners reports to demonstrate consistency of practice and help clarify the expectations of external examiners across the UK. To ensure this template meets the needs of different institutions and subjects, institutions would be able to add questions to the template.
57. As a further development of the transparency of external examining arrangements, institutions should publish information about who their external examiners are, demonstrating the number and range of external examiners that support the institutional management of academic standards. We recognise that there could be concerns that this might encourage students to contact them directly. It should be made clear that students on a programme should not get in direct contact with an external examiner.

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

**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?**

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

**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?**

## **Section 7 – Raising Concerns**

58. External examiners make judgements and offer advice to institutions in the context of the institutional responsibility for academic standards. It is important for the credibility of external examining arrangements for there to be a clear, open and robust dialogue between departments, institutions and external examiners. Institutions should demonstrate to external examiners, student representatives, PSRBs and external auditors/reviewers that they have fully considered the judgement and advice of the external examiner, even where they may not accept them.
59. There will be occasions where an external examiner may have concerns, either about the process of examining or the academic standards achieved in the programme and will need to raise these concerns with the relevant department, the institution and possibly outside the institution. It is crucial to the credibility of external examining arrangements for there to be clear and trusted routes for external examiners to raise these concerns, including routes for when they are concerned that either the department or the institution is not addressing them effectively.
60. Within an institution there should be procedures for external examiners to raise concerns and these will include dialogue with the department, participation at examination boards and making comments in their reports. If the external examiner still has concerns then they need additional internal routes to raise these to enable the institution to respond, this could be another committee or a named senior member of staff, in the last resort external examiners should have the opportunity to take matters up with the Vice-Chancellor.

61. If an external examiner still has concerns then they need an independent, rigorous process outside of the institution which can consider and address the concerns. Currently external examiners do have the opportunity to raise concerns through the QAA Causes for Concern procedure, outlined in Annex K. It is not clear how well this is known amongst external examiners or institutions, it is also not clear to what extent this process is integrated into institutions own procedures for external examining .We believe that the Causes for Concern procedure, operated by the QAA could serve the purpose of considering external examiners concerns where they do not feel that they have been adequately addressed by the institution. This procedure needs to be well publicised.

**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?**  
**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?**

**HEFCE - Report of the sub-committee for Teaching, Quality, and the Student Experience: HEFCE's statutory responsibility for quality assurance – October 2009 - Conclusion and Recommendations**

Sub-committee's judgement on the external examiner system

*Is there substance to the allegations?* The system is under strain, and some substantive areas would benefit from support and improvement.

*Public confidence:* Negative public perception is a serious concern. There is a need to educate the wider public about the role of the external examiner system and what it can and cannot do.

*HEFCE's statutory duty:* The sub-committee considers that there is sufficient evidence to be confident that the external examiner system is robust enough to enable HEFCE to fulfil its statutory duty at present. It is not certain, however, that this will continue unless changes are made to the system.

Recommendation:

R5. The sub-committee considers that a full review of the external examiner system is needed, and that it is particularly important to consider the following:

- a. Provision of sufficient confidence to all relevant stakeholders, including HEFCE, that standards of awards are at an appropriate level and comparable across the sector. External examiners' role in this regard should be clarified and communicated to a wider audience
- b. Provision of an independent recourse by which external examiners feel able to raise issues or concerns when routes within institutions' own processes are exhausted (this is of critical importance to public confidence)
- c. Whether the system is sufficiently well supported by institutions to function effectively
- d. Whether the system is appropriate to changing practice
- e. Whether external examining is sufficiently well recognised in promotion procedures
- f. General terms of reference for the external examiner role, including a job description, should be agreed across the sector. This will help to ensure consistency

and comparability, and make it easier to explain to the public at large exactly what role external examiners play in assuring standards. It may be most appropriate for QAA to include this in the relevant section of its 'Code of Practice'

g. The sub-committee specifically recommends that at audit a representative sample of external examiners is interviewed by the panel

The sub-committee acknowledges that addressing these issues will require a considerable amount of work over an extended period. This will require engagement from a wide range of sector organisations and institutions themselves. Given that the system is UK-wide, UUK and GuildHE may wish to consider taking forward some aspects of this recommendation, especially point b. Further discussion would be needed as to the organisations, parameters and timescales involved.

(Available at:

[http://www.hefce.ac.uk/pubs/hefce/2009/09\\_40/](http://www.hefce.ac.uk/pubs/hefce/2009/09_40/) )

**Membership of Review Group and Expert Group**Review Group

Ms Helen Bowles, Policy Adviser and Deputy CEO, GuildHE  
 Professor Dame Janet Finch CBE (Chair), Vice-Chancellor, Keele University  
 Professor John Last, Principal, Norwich University College of the Arts  
 Professor Noel Lloyd CBE, Vice-Chancellor, Aberystwyth University  
 Mr Sean Mackney, Head of Learning and Teaching, Higher Education Academy  
 Ms Joy Mercer, Quality Manager, Association of Colleges  
 Dr Jayne Mitchell, Director: Development and Enhancement Group, Quality Assurance Agency  
 Mr Aaron Porter, President, National Union of Students  
 Professor Sue Scott, Pro-Vice-Chancellor, Learning Innovation, Glasgow Caledonian University  
 Mr Simeon Underwood, Academic Registrar, The London School of Economics and Political Science  
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 Professor Geoffrey Channon, PVC (Teaching & Learning), University of the West of England, Bristol  
 Mr Paul Cottrell, National head of cross-sectoral professional policy, University and College Union (UCU)  
 Professor Lesley Dobree, Deputy Vice-Chancellor (Academic), Anglia Ruskin University  
 Professor Dame Janet Finch CBE (Chair), Vice-Chancellor, Keele University  
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 Ms Caroline Johnson, Academic Registrar, University of Surrey  
 Mr Mark Leach, Research and Policy Officer (HE), National Union of Students  
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Dr Claire Taylor, Head of Learning & Teaching, Bishop Grosseteste University College  
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Ms Eleanor Taylor, Associate Director of HE Curriculum and Quality, West Nottinghamshire  
College  
Mr Greg Wade, Policy Adviser, Universities UK  
Professor Thomas Ward, Pro Vice-Chancellor, University of East Anglia

**House of Commons Innovation, Universities, Science and Skills Committee – Report on Students and Universities – July 2009 – Recommendations in Relation to External Examining**

The starting point for the repair of the external examiner system is the recommendation made by the Dearing Report to the Quality Assurance Agency “to work with universities and other degree awarding institutions to create, within three years, a UK-wide pool of academic staff recognised by the Quality Assurance Agency, from which institutions must select external examiners”. We conclude that the sector should now implement this recommendation. Drawing on the evidence we received we would add that the reformed QAA should be given the responsibility of ensuring that the system of external examiners works and that, to enable comparability, the QAA should ensure that standards are applied consistently across institutions. We strongly support the development of a national “remit” for external examiners, clarifying, for example, what documents external examiners should be able to access, the extent to which they can amend marks—in our view, they should have wide discretion—and the matters on which they can comment. This should be underpinned with an enhanced system of training, which would allow examiners to develop the generic skills necessary for multi-disciplinary courses. We conclude that higher education institutions should only employ external examiners from the national pool. The system should also be transparent and we conclude that, to assist current and prospective students, external examiners’ reports should be published without redaction, other than to remove material which could be used to identify an individual’s mark or performance.

Paragraph 273, pages 121-122

(Available at:

<http://www.publications.parliament.uk/pa/cm/cmdius.htm> )

## **Recommendations from NUS “Quality Matters” 2009**

### **Recommendation 1: A National Convention & Network**

External Examiners are tasked with ensuring comparability of standards across UK higher education, however there is no system to ensure that all examiners interpret standards in the same way. NUS believes that there should be an annual national convention on standards for external examiners to share good practice and ensure parity moving forward. A virtual network should also be created to allow discussion amongst External Examiners in the absence of large-scale physical meetings. This should be linked to the HEA subject centres.

Raising the profile of the external examining system will ensure greater prestige for being an external examiner which should encourage more involvement in the process.

### **Recommendation 2: Professionalising the System**

Lord Dearing’s report suggested that the QAA be charged with assuring the professional development of external examiners, but there is little evidence to suggest that this has been fully realised. Far greater resources need to be put in place to allow QAA and the Higher Education Academy to create a holistic programme of development and training for external examiners that should be **mandatory** upon taking up the responsibility.

Being an external examiner should be recognised within the career path of senior academics to ensure that it is seen as a valuable experience rather than a time-consuming add-on.

### **Recommendation 3: Improving Public Information**

External Examiners have a tremendous responsibility and the outcomes of their work should be published openly. Whilst this happened under the TQI website it was dropped in the move to Unistats in 2006. Students have a right to understand how and why decisions on standards across the sector are made and information about who they are and what they do should be more widely available – although we would recognise that this information should be made available in an accessible way and should be primarily targeted at informed students such as course and faculty reps as well as students’ union officers, although some students may also be interested in these summaries. There should be a requirement for institutions to publish their reports (taking account of issues around confidentiality) and HEA/QAA should publish more detailed national outcomes documents.

Additionally, institutions should feed back to the external examiner how they have acted on

the report and if external examiners that feel their reports are not being considered seriously by the institutions should be able to take it through the QAA's Causes for Concern process. Institutions should provide an advertised space online for students to discuss in an open forum the national outcomes, as well as the internal reviews; this would go a long way to ensuring transparency of internal quality assurance and enhancement.

#### **Recommendation 4: Ensuring Transparency & Impartiality**

External Examiners are currently paid a nominal stipend by institutions. NUS believes that they should be paid in a similar way to the QAA's auditors; i.e. that payment should come from outside of the HEI to ensure examiners are impartial and seen to have sufficiently removed interests from the institution and also the increased payment would make it more attractive. This should help increase public confidence in the system; and consequently in the standards of UK higher education.

(Available at:

<http://www.nus.org.uk>

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## **Scope of the Review**

### **Purpose**

For Universities UK and GuildHE to review external examining arrangements in the UK in order to:

Consider and recommend what improvements need to be made to ensure that external examiner arrangements effectively support the comparability of academic standards and are robust enough to meet future challenges.

In doing so, the Review will:

- Ensure that issues arising from the QAA thematic review, the IUSS Select Committee Report, the HEFCE TQSE sub-committee and the BIS Higher Education Framework are considered and addressed
- Work in partnership with interested bodies and agencies across the UK including the QAA, HEA, NUS and AoC
- Keep in touch with the views and concerns of Funding Councils and Government
- Look to co-ordinate and support the work of other bodies in this area, most notably QAA and HEA, to avoid duplication, maximise coherence and facilitate clear and simple public messages about the development of external examiner arrangements
- Maintain effective links with the development of the Quality Assurance Scheme.
- Contribute to the development of an effective Universities UK and GuildHE public position on quality and standards

### **Issues**

The issues that the Review (or organisations that the review will work with) will consider, include:

- The core and changing role of external examiners and the way in which this is communicated to a wider audience
- Development of Terms of Reference for the role, to ensure consistency and comparability
- The specific role of external examiners in ensuring appropriate and comparable standards
- Following up recommendations of external examiners
- Involvement of external examiners during the lifespan of a course
- The level of support given by institutions to external examining, both financial and professional
- The appointment, training, induction and duration of office of external examiners

- Current and future challenges and changing practice (such as modularisation) and their implications for external examining
- Recognition of the external examiner role in promotion procedures
- Comparable international practice
- External examiners and FECs - their sourcing, payment and partnership arrangements
- How best practice can be shared and adopted, including the value of a “college of peers” model
- The availability of an independent recourse for external examiners for raising concerns when routes within institutions’ own processes are exhausted
- The section of the QAA Code of Practice on external examining

**Revised Principles and Objectives for Quality Assurance in England and Northern Ireland**

- a. Provide authoritative, publicly accessible information on academic quality and standards in higher education.
- b. Command public, employer and other stakeholder confidence.
- c. Meet the needs of the funding bodies and of institutions.
- d. Meet the relevant needs of all students.
- e. Rely on robust evidence-based independent judgement.
- f. Support a culture of quality enhancement within institutions.
- g. Work effectively and efficiently.

(Extract from *Future Arrangements for Quality Assurance in England and Northern Ireland – Outcomes of Consultation*, available at:

[http://www.hefce.ac.uk/pubs/hefce/2010/10\\_17/](http://www.hefce.ac.uk/pubs/hefce/2010/10_17/))

## Other Arrangements for Supporting Academic Standards

Other internal mechanisms include:

- **Making sure new courses meet the appropriate standards, and will be supported by high quality teaching:** Programme Approval Panels or their equivalent, usually involving external experts, will consider whether proposed new courses are in line with the *Frameworks for higher education qualifications* and Subject Benchmark Statements.
- **Regular monitoring and review:** Higher education institutions continuously monitor courses to make sure they are fit for purpose. Many do this on an annual basis, for example, by considering reports by external experts and evaluating student performance and feedback; and through Periodic Reviews every five or six years involving internal and external peers, students and recent graduates of the course. As well as regular scrutiny at the level of individual courses, some universities and colleges conduct their own, wider, subject-level reviews.
- **Assessment:** All higher education institutions have regulations about how student work is assessed to ensure that standards are maintained at the appropriate level, and that student work is properly judged against this. These regulations are informed by the *Code of Practice*.
- **Providing public information:** Higher education institutions publish information about individual courses (eg. Programme Specifications). Students' views from the National Student Survey results are published on the *Unistats* website alongside other information about progression and completion rates, and post-graduation employment.

*[Note: A consultation is to be issued jointly by HEFCE, UniversitiesUK and GuildHE in Autumn 2010 on public information needs about higher education in England and Northern Ireland]*

The Academic Infrastructure, includes:

- ***Code of Practice for the Assurance of Academic Quality and Standards in Higher Education***, which sets out precepts and guidance for universities about the management of academic quality and standards, covering a wide range of processes and procedures from external examining to careers education;

- **Frameworks for higher education qualifications**, describing the standards represented by each qualification. There is one for Scotland, and another for England, Wales and Northern Ireland;
- **Subject Benchmark Statements**, setting out how standards apply in particular subject areas; and
- **Programme Specifications** providing detailed information about individual courses, describing what students should learn, and how these outcomes will be achieved and demonstrated.

*[Note: A separate consultation is to be issued by the QAA to invite views on possible changes to the Academic Infrastructure following the evaluation and discussion paper issued in February 2010]*

(Extract from *Quality and Standards in UK Universities: A guide to how the system works*, available at:

<http://www.universitiesuk.ac.uk/Publications/Pages/Quality-and-standards-in-UK-universities-A-guide-to-how-the-system-works.aspx> )

### **Subject Variation and the role of PSRBs**

As well as the Academic Infrastructure, Professional, Statutory and Regulatory Bodies play a significant and valuable role in relation to academic standards and quality assurance in UK higher education. For professions which are regulated by law because they grant a licence to practice, such as medicine, the relevant PSRB will be closely involved in the design, approval, monitoring and review of courses. Many PSRBs accredit courses, approving their delivery and operation against specific criteria. The impact of PSRBs on individual institutions varies according to how many professional and vocational programmes they deliver, the examples from HE institutions on the Expert Group indicated that in some institutions it can be lower than 10% of programmes covered by such bodies, on many others it can be over 50% and some over 70%.

To our knowledge only a small number of PSRBs get involved in the external examining process but as PSRBs can have a significant impact on academic standards and assessment within a subject they will impact on the role of the external examiner within those subjects. If the sector is to seek to provide more consistent external examining arrangements it will need to ensure that it is flexible enough to take account of the needs of different PSRBs in the sector.

### **The Purpose of External Examining, Extracts from the QAA Code of Practice for the Assurance of Academic Quality and Standards in Higher Education: Section 4 External Examining**

The current QAA Code of Practice identifies three main purposes of external examining:

- to verify that academic standards are appropriate for the award or part thereof which the external examiner has been appointed to examine;
- to help institutions to assure and maintain academic standards across higher education awards;
- to help institutions to ensure that their assessment processes are sound, fairly operated and in line with the institution's policies and regulations.

The Code or Practice outlines these purposes in more detail in the first precept of the Code specifying that an institution should ask its external examiners, in their expert judgement, to report on:

- i. whether the academic standards set for its awards, or part thereof, are appropriate;
- ii. the extent to which its assessment processes are rigorous, ensure equity of treatment for students and have been fairly conducted within institutional regulations and guidance;
- iii. the standards of student performance in the programmes or parts of programmes which they have been appointed to examine;
- iv. where appropriate, the comparability of the standards and student achievements with those in some other higher education institutions;
- v. good practice they have identified.

It also recommends that institutions will expect external examiners to endorse the outcomes of the assessment(s) they have been appointed to scrutinise.

(Extract from the QAA Code of Practice Section 4 available at:

<http://www.qaa.ac.uk>

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*[Note: Although Section 4 of the Code of Practice focuses on external examining, references to external examining are also made in other sections of the Code of Practice]*

**Extracts From UUK Policy statement on standards, June 2010**

1. The Higher Education sector in the UK is large and diverse. There are more than 130 bodies with the power to award degrees, and more than 10,000 different courses. A key strength of the sector is the heterogeneity of its constituent institutions. Each has different missions, priorities, subject focus, research interests and infrastructure. This enables the sector as a whole to meet the various needs of different types of student, and to offer the range of disciplines required. Students undertake higher education for different purposes and will go to different types of institutions to achieve their purposes.

2. We have a national system which assures the quality and standards of our awards. This ensures that the standard of degrees is broadly comparable across the system; not equal or identical but broadly comparable. We have no national curriculum in higher education, nor do we have a national council of academic awards. We do not think that either of these would provide a good deal for students and employers. They would stifle innovation and diversity, and damage the enhancement of quality. They are also not necessary, given that there are already a number of important safeguards in place to protect the value of a UK degree, from whichever higher education institution it is obtained. This statement describes these safeguards.

8. All institutions are expected to work within with this broad framework, and there are two mechanisms to ensure that they do this. The first is *external examining arrangements*. These independent and impartial academic advisers are drawn from other universities or from professional practice. They report on whether the academic standards set for the award are appropriate; the extent to which its assessment practices are rigorous; and the comparability of the standards and student achievements with those in other institutions.

**Comparability of standards**

15. Some people ask about a 2:1 at one institution compared to a 2:1 at another but in the same subject. Are they identical? We think that the only way to make them identical would be if there were a national curriculum and a national examination system. No-one is seriously arguing for that. So no, they are different, because there will be different curricula, in order to provide choice for students, as well as to capitalise on the specialisms of the staff who teach them and the needs of different employers. And there will be different assessment methods. But they are all designed and assessed against threshold standards published by the QAA and agreed by all universities. The Higher Education Achievement Report, which is currently being piloted in a small number of HEIs, will be useful in terms of providing the detail which explains what lies behind a particular degree classification for a particular student.

16. The question then comes up, which 2:1 is “worth more?” We think that this is the wrong question to ask, because it involves comparing apples and pears. What is right for one student and one employer won't be right for another.

(the full statement is available at:

[www.universitiesuk.ac.uk/PolicyAndResearch/PolicyAreas/QualityAssurance/Documents/UK%20Policy%20statement%20on%20standards.pdf](http://www.universitiesuk.ac.uk/PolicyAndResearch/PolicyAreas/QualityAssurance/Documents/UK%20Policy%20statement%20on%20standards.pdf).)

### QAA Causes for Concern Procedure

QAA has developed procedures for handling Causes for Concern in institutions that provide higher education in England and Wales. There is also a similar procedure for managing potential risks in Scotland.

A Cause for Concern is strictly defined for this purpose as 'any policy, procedure or action implemented or omitted by an institution that appears likely to jeopardise the academic standards and quality of its higher education programmes and/or awards'.

It is important that Causes for Concern are not confused with individual disputes between institutions and students, or with staff employment disputes with institutions. QAA has no remit or power to become involved in individual disputes involving students or members of staff and higher education institutions, either as an arbitrator or on their behalf.

QAA can, however, investigate concerns that relate to an institution's policies or procedures (or lack of these) that are having a serious adverse effect on its academic standards and the quality of its higher education awards.

If you are engaged in a personal dispute that you believe has developed as a result of a more general problem that has come to light at an institution, we may be able to consider that element of your complaint under our Causes for Concern scheme, but please note that **we will not be able to remedy your personal situation or offer you redress.**

**Please also note that we do not have the power or the remit to request that your institution, or an external examiner, remarks or regrades your work; and we cannot remark or regrade your work ourselves.**

QAA will not normally consider a matter of concern if you have not first tried to resolve it using the institution's own internal procedure. Please also note that, unless there are exceptional circumstances, QAA will not investigate complaints while other investigatory processes, for example an institution's own internal complaints procedure, an investigation by the Office of the Independent Adjudicator, or an Employment Tribunal, are taking place.

(extract from QAA Website, more details available at:

<http://www.qaa.ac.uk>

A visual guide to the process is available at:

<http://www.qaa.ac.uk>

