

Degree Classification Consultation

GuildHE Response

Consultation questions

1. Does the adoption of a UK sector-wide statement of intent represent an effective approach to meeting the challenges outlined in the report?

- a. Yes
- b. No
- c. In part

Please explain your response.

The sector needs to be seen to maintaining academic standards and robustly challenging any practice that may be seen to undermine this. If the sector is not seen as a respected partner in co-regulating its own activity then it opens up the threat that the regulators (such as the OfS in England) will seek step in and get involved, particularly on the back of media and Ministerial interest and stoking public concern.

Therefore, a strong sector-wide statement articulating our commitment to continue to protect standards is a key additional tool to maintain wider confidence. This sector level statement should be accompanied by institutional statements so that Boards of Governors/Councils can be assured of their responsibility to maintain academic quality based on the principles of institutional autonomy.

GuildHE believes that education is about supporting people to achieve their potential through outstanding teaching and learning. The higher education sector has therefore developed a grading and classification system that is based on whether or not an individual achieves the criteria for course learning outcomes, which therefore means that the more people that meet these criteria the more people that will achieve a particular grade. This is an important principle of recognising the learning of the individual, rather than placing quotas on student success through creating hierarchies depending on where a student is compared to their fellow students (known as “norm-referencing”).

It will be important for institutions to provide a robust evidence base where student achievement has improved, and this should be scrutinised by board of governors/Council. Ultimately, however, there is a disconnect between the expectations of employers, who are seeking ways of differentiate between applicants, and those of higher education providers who are recognising the achievement of students. A strong statement defending the benefits of criterion-based classification would be welcome, and more work with employers to outline the purpose of classification system.

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

The UK Standing Committee for Quality Assessment, advised by the QAA, should oversee the response to the consultation process and the resulting sector-wide activity. It should regularly consider the impact of the reforms and whether more activity is needed to continue to maintain the confidence in academic standards. There should be a clear communication

plan to explain what the UK sector already does and what it commits to doing, now and in the future, that would support the development of the statement of intent.

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

The sector-wide statement should be produced in time for the start of the 2019/20 academic year at the latest. Institutional action should be considered in three phases, one would be a thorough evaluation of practice in line with whatever actions the statement commits the sector to. Following that evaluation there would then need to be a modelling and investigation phase and then an implementation phase. The quicker we, together as a sector, can complete phase one and identify areas of concern and then model appropriate responses, and then progress to implementation the better. It should be recognised that within smaller institutions the time needed to undertake a review could be longer with the potential need to allocate staff time/resources to source/analyse the necessary data before a review can begin.

It is therefore likely to take approximately a year to undertake this analysis effectively and develop the action plan, with then an expectation of the proposals to go through Board of Governors/Council. Some of the changes might take longer to implement, particularly where students would need to be notified in line with CMA guidance. However, there are specific proposals, such as transparency of the institutional degree algorithm(s) – where this does not already happen - that should be done much more quickly. It will be important to manage expectations of regulators and press, if new changes to regulations aren't introduced for new students for a couple of years, then it is likely to be at least five years before any real impact might be seen in student achievement outcomes, as it will take several years for the new students to complete their course.

4. How can the statement of intent be taken forward by the different national higher education systems of England, Wales, Scotland and Northern Ireland within their national quality and regulatory frameworks?

It is important that there is an overarching framework/set of principles that applies to the whole of the UK. But given the increasing divergence between the different parts of the UK it might be appropriate to consider a model similar to the Quality Code with Core Practices for all parts of the UK. There could then be specific requirements for demonstrating how an institution meets the principles within each of the four nations developed at the national level by the appropriate bodies. It is important that any regulatory burden should be kept to a minimum and should be based on the principle of collecting data once and using it for multiple purposes.

5. Are the evidence areas proposed at Table A for inclusion within a 'degree outcomes statement' appropriate for supporting an institution to identify potential 'grade inflation' risks and provide assurance to maintain public confidence?

- a. Yes
- b. No
- c. In part

Please explain your response.

It will be important to consider who the audience is for the degree outcomes statement. Whilst it will be important that the Board of Governors/Council to consider the statement it should also have a student and regulator perspective in mind as well. It will therefore be worth considering the type of evidence that governors would need to ensure that they are being robustly assured of the maintenance of academic standards, and also the information that students/regulators would need.

The evidence outlined in the table would provide useful information for governors in their assurance activities. However, for students perhaps a more simple summary of the data might be required, where an institution presents their data over a five-year period and the evidence to justify any fluctuations (eg a new teaching and learning strategy with a focus on staff mapped to the UKSPF). However, there is a real question about whether this information would really be of interest to students and therefore whether they are actually one of the audiences. It would be worth researching this in more detail to identify a need for a student facing statement.

We believe that much of these areas are already public and/or required, and as such there is a real chance of repetition and even confusion. Might an alternative approach be to expect each institution to have a gateway page to show where this information is available rather than creating a new document?

Other information that could usefully be included would be information about PSRB accreditation, outlining internal quality processes, consideration of how value-added is measured as well as information about good academic conduct and tackling essay mills etc.

Table A includes publication of equalities impact assessment. In small institutions with very small numbers of students with protected characteristics, it is unclear whether this would work in practice, particularly in terms of 'potential impacts'.

6. Do you consider there to be merit in gaining assurance from an 'external advisor on academic standards'?

a. Yes (please explain your response)

b. No (please set out any other mechanisms for enhancing external assurance)

It is important to reflect on the purpose of this proposal and whether this is the most effective way of achieving the goal or if there are other ways of doing so. The question is worded as if there is an assumption that the existing processes are not currently effective, but with limited evidence that this is actually the case. Many institutions already have robust external advice within their governance processes. There is also a question about the extent to which an additional role will actually impact on perceptions regarding grade inflation - how likely are those who are concerned about the effectiveness of existing mechanisms to be more convinced by input from such an external advisor role?

However, each institution should be encouraged to reflect on how effective their board of governors/Council are at discharging their enhanced responsibilities for academic governance and how they might strengthen this if necessary. This might be through additional academic appointees to governors/council, a chief external examiner role, in England this could include internal audits commissioned from QAA or others, or indeed other ways of providing assurance. But it should be up to each institution to consider how they

reassure themselves that they have robust processes in place to maintain academic standards.

7. What are the:

a. opportunities and/or

b. challenges

associated with including the commitments to strengthening the external examiner system in the statement of intent?

It is worth noting that whilst it is broadly welcome to formalise the external examiner process a bit more, we shouldn't unintentionally lose the valuable insights that can be given by these staff informally and we should also recognise the challenges that they may have on their time and the different expectations that different institutions have on external examiners. It should also be noted that whilst external examiners are able to comment about current standards it is perhaps harder for them to comment on how standards have changed over time.

While in principle strengthening the external examiner system is to be welcomed we are concerned about any approaches that might discourage academic staff and professional staff in other areas (working in the NHS or private practice, for example) from being prepared to take on these roles. (If training becomes too time consuming for example or the role becomes considerably larger).

8. What are the:

a. opportunities and/or

b. challenges

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

Whilst the AdvanceHE training packages could be helpful, particularly for those external examiners that would like to develop their skills and receive accreditation for this. However, each institution will want to consider whether they only recruit external examiners that have accreditation or rather whether this is "desired", but may not be applicable in all cases where the individual is able to demonstrate their expertise without necessarily having the accreditation. For example, some highly experienced individuals may not prioritise UKPSF accreditation for their external examining due to time pressures, however the recruiting institution will probably seek evidence for how they are keeping their skills and knowledge up-to-date if they aren't doing the training. Appointing external examiners in some disciplines, or for some institutions, can be a challenge and so we should be seeking to reduce barriers rather than create more.

For some small and specialist institutions we are concerned about any actions which may appear to make it more difficult for them to find and recruit appropriate external examiners. Given that some of those who act as externals do so 'voluntarily' (and particularly for those from outside HE with professional expertise who take on these roles,) any suggestion that accreditation would be a requirement or expectation could reduce what can already be a small 'pool'.

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

We do not see there are necessarily any specific barriers to implementation, not least given that many of the recommendations are already inherent in the guidance and expectations of the UK HE sector. However further changes and implementation may take time, given the likely need for any changes to algorithms to be implemented on a rolling basis.

There can often be complicated reasons – sometimes cultural as well as academic – for why an institution has developed the algorithm(s) that it may have and changing this can be difficult. For example, some subject disciplines will argue for the need for different algorithms to reflect their pedagogy. In larger institutions with many disciplines there are different routes of either one algorithm for all subjects or several different algorithms for different groups of subjects, but the practice of several different algorithms for the same student has now been almost entirely ended.

However, it should be noted that any changes to degree algorithms can take many years to implement, since in-year changes for current students can be challenging given CMA compliance.

It would be helpful to accompany individual institutional explanations of the algorithms with a sector wide narrative, explaining what degree algorithms are and that diversity is legitimate.

In light of the changes to the regulatory framework in England, with new providers able to apply for new degree awarding powers despite ever having been in a validation/accreditation agreement, it would be worth considering whether there should be a model set of rules for a degree algorithm which could be used for these new providers.

10. Should the statement of intent contain a provider's explanations of:

a. weighting of marks? **Yes/No**

b. 'zones of consideration'? **Yes/No**

Whilst there is a strong case to be made for no zones of consideration there are also questions about the robustness of marking and whether it is really possible to describe the difference between a 62 and a 63 – which over several modules could make a difference to the overall classification. But if there is to be a zone of consideration it needs to be transparent.

c. 'discounting' low performing modules? **Yes/No**

This can sometimes be a good thing in terms of encouraging risk taking and students taking different modules, rather than the ones that they know they will pass. It was also suggesting that this should only happen where the student has passed the course, and so met the learning outcomes but just dropping the lowest mark. It was suggested by some institutions that not weighting year 1 marks could be seen as a form of discounting.

d. PSRB influences on algorithm design? **Yes/No**

It should be transparent what the expectations of the professional body, and whether they stipulate that particular modules need to be passed and so on.

Please explain your responses.

Presumably it will be the institutional “degree outcomes statement” rather than the national “statement of intent” that considers each of these questions.

11. Does the proposed classification description in Annex A provide an appropriate reference point for degree classification practice?

a. Yes

b. No

Please explain your response

The top-line statements are a helpful reference point, (including in making clear that 3rd and 2:2 degrees also have considerable value and meet all required learning outcomes). However, the more detailed descriptions do not necessarily help provide clarity between the grades or capture the nuance of different subjects. Therefore, the more detailed descriptors should be seen as a tool to support institutions to develop their own descriptors, rather than a prescriptive document in its own right.

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

A statement may need to be added to the high level descriptors to explain that where a course involves an assessment or professional competencies, it is likely that no award will be made if the student does not meet those competencies.

We believe that work, in conjunction with the sector and relevant sector bodies (such as AdvanceHE) and PSRBs (where relevant), should be conducted to enable the development of a common taxonomy which delineates levels of achievement.

13. Do you agree that the proposed classification description should be incorporated into national quality assurance and regulatory frameworks, as is appropriate for different national contexts? In England, this would mean the use of the proposed classification description as 'sector-recognised standards' as defined in section 13(3) of HERA.

It might be helpful to incorporate the top-line statements as a document aligned to the FHEQ, with an expectation that institutions have their own grade descriptors. But for the more detailed statements it should be clear that it is a model document, similar to the Advice and Guidance sections of the Quality Code, that you would expect institutions to amend to their own context. In particular this would be a helpful statement for new providers.

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

a. institutional practice

b. other relevant documents or frameworks?

As above. The general top level descriptor of awards is very helpful and could be widely used as part of conversations about the value of degrees other than those commonly regarded as ‘good’. If it was a sector recognised expectation then we would have to be able

to demonstrate, if questioned, that we have embedded it in our courses and evaluate ourselves against it regularly. How an organisation does that should be left to them.

15. What are the:

a. benefits

b. challenges, and/or

c. national considerations

of using a shared sector metric to inform institutional self-assessment of degree classifications over time?

This would be a welcome development for institutions – and their governors/council members - to help sense-check where they are on the right scale, but for the first few years it should be very clearly labelled as “experimental data”. There are many factors that can result in improvement of grade profiles – beyond those highlighted in the consultation document - and it should be considered how these can be considered and incorporated into any benchmarking before institutions are held to account for this by regulators. It will therefore be important to have both data and a narrative to explain differences. There will of course be data challenges in smaller institutions or at the PGT level.

Even though the purpose is ostensibly for self-assessment, how might this then be used by regulators? There is a concern as to what action institutions might be expected to take in the light of benchmarking against such a metric, particularly in the absence of any contextualisation. Would an increase over time automatically be perceived negatively - would institutions be expected to work to reduce ‘good degrees’ on the basis of performance against this metric, irrespective of the other factors that can result in improved grade profiles?

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

We believe that, if such a metric is created, it should be defined with respect to subject mix, both nationally and within providers, whilst also being as clearly understood as possible. The key question when considering “over time” is how long we are referring to? Also, are we suggesting that institutions that have already been on an upward trajectory over recent years will be expected to reverse that trend and if yes how will that impact on previous years graduates who may be seen as having inflated marks. It is therefore difficult to look retrospectively now, but it is something that institutions will have to be mindful of going forward.

17. How can sector reference points be better used, with more consistency, by external examiners to support institutions to protect the value of qualifications over time?

This was a key element in QAA Reviews – and remain so outside England. For external examiners it should be something that is included as part of their training so that they know what they are and how it related to considering standards, but without significant expanding their roles it will be challenging to expect much more than that. The use of sector reference

points is perhaps more appropriately emphasised as part of course approval/review, although all external examiners should of course be aware of, and working with, them.

18. Should the sector explore the steps that could be taken to remove, or reduce the impact of, the inclusion of upper degrees (1st and 2.1 awards) in algorithms used to rank university performance?

a. Yes

b. No

Please explain your response.

Including this data in league tables can act as a driver for improving grade profiles and so it would be important to discuss with league table providers how they can present this information without it being included in the algorithm used to rank institutions. It should also be recognised that TEF is a way of ranking universities that now included this data.

The including of this data also continues the perception that only a 1st or 2:1 award is really of value which is something that we should challenge.

19. What should be the parameters and remit for a UK-wide task and finish group on the long-term sustainability of the UK's degree classification systems?

Work around the perceptions of classifications would be valuable – especially the perception of 2:2s and Thirds which are sometimes be seen as not very valuable by employers.

As highlighted in our response to Question 1 it would be useful to consider the fundamental purpose of classifications. We recommend that any suggestion to consider replacing classification with a system which is based on norm-referenced should be resisted.

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

Reform option	Yes/No
Introduction of new upper award - for example, a starred first	MAYBE – more consideration required
Introduction of a 'cohort ranking' - for example, providing additional information on graduates' position in the grade distribution	PROBABLY NOT– some further consideration might be helpful
Resetting the classification boundaries - for example, moving up by 10 marks so 80 = 1st and so on	NO – but it is interesting that 40% is allocated to the fail band, 30% allocated to the First band and then 3rds/2:2s/2:1s all squashed

	into the remaining 30% - it could be considered whether there are arguments for spreading it out a bit more.
More regular review of Subject Benchmark Statements to keep pace with improvements in teaching and learning	YES
Universal HEAR format	YES
Other (please explain)	NO
No reform required	NO

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