

HEFCE 01/66
November
Consultation

Respond by 21 December 2001

Information on quality and standards of teaching and learning

Proposals for consultation

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To	Heads of HEFCE-funded higher education institutions in England Heads of HEFCE-funded further education colleges in England Recipients of HEFCE publication 01/45
Of interest to those responsible for	Quality assurance, Information management
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Executive summary

Purpose

1. This consultation document sets out proposals on what information on the quality and standards of learning and teaching should be available in each higher education institution (HEI), and which elements should be published.

Key points

2. The joint HEFCE/QAA/SCOP/UUK¹ consultation document 'Quality assurance in higher education' (HEFCE 01/45) set out proposals for a revised method for quality assurance in higher education in England. As part of the proposed approach, the document also announced the setting up of a Task Group to identify the categories of data, information and judgements that should be available, and which should be published. The Task Group is chaired by Professor Ron Cooke, Vice-Chancellor of the University of York.

3. The Task Group's proposals set out in this document cover:

- the characteristics of the data to be assembled and published by HEIs
- levels of disaggregation that should be used in relation to subject groupings
- main headings for collecting information about quality and standards
- the quantitative and qualitative information which should be published.

4. By way of a summary, Annex C lists all the information which the Group proposes should be available, and those elements which should be published.

5. This document is being sent to all HEFCE-funded HEIs and further education colleges, and a range of other interested parties. It is also being issued for information to all higher education institutions in Scotland, Wales and Northern Ireland, where separate discussions about quality assessment arrangements are under way.

Action requested

6. Comments should be sent to Emma Creasey at the HEFCE by **Friday 21 December 2001**.

7. The HEFCE will circulate all responses to the QAA, UUK and SCOP. The responses will be analysed and presented to the Task Group in January for further discussion before final decisions are taken.

¹ The Higher Education Funding Council for England, the Quality Assurance Agency for Higher Education, the Standing Conference of Principals and Universities UK.

Introduction

8. The HEFCE, Universities UK, SCOP and the QAA jointly issued in July 2001 a consultation document setting out proposals for a revised method for quality assurance in England, 'Quality assurance in higher education' (HEFCE 01/45). The main characteristics of the proposed method, as stated in paragraph 10 of that document, are that it would:

- a. Develop institution-level review, conducted on audit principles, as the basis of external review. Through that mechanism the HEI demonstrates the reliability and effectiveness both of its internal quality assurance arrangements and of the information which it generates.
- b. Carry out only on a highly selective basis detailed external reviews at the level of the subject area or theme, rather than continuing to review externally all subject areas on a comprehensive basis. This is a primary means for securing lightness of touch.
- c. Vary the intensity of external review on the principle of 'intervention in inverse proportion to success', selecting subject areas or themes for more detailed review on a purposive basis, focused on programmes and institutions where there may be grounds for concern about quality and standards.
- d. Review not only the institutional mechanisms and procedures for securing quality and standards, but also the outcomes delivered in practice – that is, the quality and standards actually experienced and achieved by students.
- e. Use the information collected to contribute, in partnership with others, to enhancing quality and standards across higher education.

9. Institutional review would include testing the availability within the HEI of information relating to quality and standards of teaching and learning.

10. A Task Group, under the chairmanship of Professor Ron Cooke, Vice-Chancellor of the University of York, was set up to prepare recommendations on the information relating to quality and standards which all HEIs should be expected, as a matter of standard good practice, to collect and have available within the institution. The Task Group's membership and terms of reference are at Annex A. The Group was also asked to recommend which elements of that information should be published by all HEIs, the definitions that should apply to secure consistency of data across the sector, and the format and frequency of publication.

11. As with HEFCE 01/45, this document applies only to England. Separate discussions are continuing in Scotland, Wales and Northern Ireland about the quality assurance arrangements which will apply in each case. But in order to promote common understanding and as much consistency as possible across the UK, the Task Group includes observers from all the UK HE funding bodies and all the UK HE representative bodies.

12. In order to guide the work of the Task Group, findings were analysed from previous studies about the information needs of students and other stakeholders relating to quality and standards. A summary of that evidence is at Annex B. A paper was also commissioned from Professor Lee Harvey of the University of Central England on student feedback questionnaires. Copies of that paper are available from Professor Harvey (e-mail Lee.Harvey@uce.ac.uk).

Initial analysis of responses to HEFCE 01/45

13. HEFCE 01/45 invited responses by 26 October 2001. An interim analysis based on a selection of 160 responses shows that there is broad support for:

- an external quality assurance method that recognises that HE institutions themselves have the primary responsibility for quality and standards

- a method that is no more burdensome than is strictly necessary to achieve its purposes
- the provision of useful public information to inform the choices of potential students and other stakeholders
- an end to universal, comprehensive subject review programmes
- a greater focus on enhancement, alongside accountability and information
- evolution towards an audit-based method that places greater reliance on institutions' own quality assurance processes to secure these purposes.

14. The QAA has also compiled all the consultation responses relating to information. Notwithstanding respondents' broad support for the proposed approach, HEIs identified issues relating both to the nature and purpose of subject-level processes in a system based on institution-level audit, and to the expectations about provision of public information. Once all responses to the consultation have been analysed, these aspects will be considered further jointly by the HEFCE, QAA, UUK and SCOP as part of the development and implementation of the new audit method. The intention is then to publish a further statement, alongside consultation proposals from the QAA on how the method would be put into operation. Meanwhile, the initial analysis of responses has been reflected in the proposals which follow.

Structure of the document

15. This document is divided into two parts. The first considers what information about quality and standards should be available within all HEIs for the institution's own internal purposes and as a basis for review and discussion in the institutional audit. For institutional audit purposes, the information needs to be sufficient to allow a judgement to be made about that institution's ability to discharge its functions in relation to standards and quality. The second part considers which elements of that wider set of information should be published by all HEIs, so that consistent and comparable information is available for students and other stakeholders who wish to use it. Annex C lists all the information that the Task Group recommends should be available internally, and the sub-set for publication.

16. Throughout the text, questions and recommendations on which the Group would particularly welcome comments are printed in bold. These are drawn together in paragraph 71.

17. The Task Group has considered the implications of the Freedom of Information Act, the Data Protection Act, the Race Relations Amendment Act, and the Disability Discrimination Act. The full consequences of the interaction between those various pieces of legislation – and particularly the implications of the Freedom of Information Act – are not yet clear. The Group has taken as its starting point the need to identify what it considers to be a sensible and balanced package of information about quality and standards. It has seen no evidence that the package set out here will conflict with legislative requirements, but that issue will need to be kept under review.

Purposes and principles

18. The main purposes of collecting and publishing information about quality and standards are:
- To secure the availability within each HEI of relevant information which the HEI uses actively and continuously to sustain and improve the quality and standards of learning and teaching on the programmes it offers.
 - To enable students, employers and other stakeholders to match their needs and objectives with the provision on offer, so that they can take decisions on the basis of informed judgements.

c. To secure accountability for the use of public funds by demonstrating where quality and standards are high, and by identifying cases where improvement is needed as a basis for rapid follow-up.

19. Throughout its discussions, the Group's guiding principle has been that the collection, analysis and publication of information should not become a significant new burden in its own right. HEIs already collect a wide array of information about quality and standards through their own internal processes, and much relevant information is already published. The recommendations seek to draw on these existing information sources wherever possible. In some cases there would need to be greater standardisation in the collection and analysis of information, extension of existing mechanisms for collecting information, or extrapolation of key elements of that information into a form suitable for publication. But the Group has sought so far as possible to avoid recommending the introduction of entirely new requirements to collect information.

20. The Group considers that data assembled by HEIs either for internal use or for publication will need to possess, as far as possible, certain characteristics. The data should be:

- consistent
- valid (in that they truly measure what they purport to measure)
- reliable (in that data are stable and replicable)
- useful both to HEIs and – for the published data – external stakeholders
- resistant to manipulation, so that the requirement to collect or publish information does not provide perverse incentives
- economic to collect and process
- intelligible (avoiding jargon)
- current (no more than a specified number of years old).

Question 1: Do you agree with the purposes and principles for collection and publication of information, set out in paragraphs 18 - 20? Are there others that should be added?

Disaggregation of information

21. A key issue for both internal collection and external publication of information is the best intermediate unit of disaggregation between the whole institution and the individual programme. This could relate to the structures in individual HEIs – that is the departments, schools or faculties. Or it could relate to subject areas defined on a nationally consistent basis.

22. The former would have the advantage that each HEI could use its existing school/faculty/department committees, boards and Groups to collect and analyse information, decide action and prepare summaries. But for the published information, the results would not then be comparable between HEIs, because different HEIs include different subject areas within their organisational groupings. If a standard classification by subject areas was adopted, it would ensure that published information was organised on a consistent assignment of programmes to subject areas. This approach would entail further work for at least some HEIs in separating out the programmes within a single faculty/department so that their results were attributed to the relevant subject areas. But that principle already applies for data returns to HESA. And the disadvantage is

reduced if the subject area classification uses fewer rather than more sub-divisions.

23. The Group concluded that a standard classification of subject areas would be preferable, to secure some measure of sector-wide consistency. The next question is which of the classifications currently in use should be adopted. Annex D lists the main classifications used for teaching and learning activities, namely:

- the 24 subject areas covered by the Learning and Teaching Support Network (LTSN) subject centres
- the 42 subject areas used by the QAA for subject-level review
- the 19 Groups of the Joint Academic Coding System (JACS). The JACS Groups are the result of a recent project between the Universities and Colleges Admissions Service (UCAS) and the Higher Education Statistics Agency (HESA) to develop a common coding system. This is being used for the first time for autumn 2001 applicants to higher education (2002 entrants). Combinations of two and three subjects can be recorded with an indication of balance between subjects in 19 JACS Groups. Information by subject on modules taken is also available. While there are institutions whose pattern of provision is not ideally reflected by the JACS system, it would provide the top level subject grouping from which information could be disaggregated as required to more detailed levels.

24. In the view of the Task Group, the use of the 19 JACS Groups represents the best intermediate classification for the collection, analysis and publication of information between whole-institution and individual programme level. Having fewer subject groupings should reduce the administrative burden on institutions, reflect changing patterns of provision over time, and allow integration of both qualitative and quantitative data.

Question 2: Do you agree that the classification system for the collection and publication of information at the intermediate level between the whole institution and the individual programme should be the 19 JACS subject areas?

Part A: Internal information which should be available within HEIs

25. The Task Group believes that it would be helpful to define a portfolio of categories of information that all HEIs should be expected to have available. The exact contents of each section of the portfolio would be for each HEI to decide according to its own internal needs, traditions and practices. When the institutional audit comes to look at each HEI's practice in relation to the collection of information, it would be looking for evidence that the categories were available and effectively used, without prescribing what each must contain.

Question 3: Do you agree with the portfolio concept – a set of defined categories of information within which each HEI collects information to suit its own needs and circumstances?

26. The Group considered that four main portfolio categories should be used as the basis for collecting information about quality and standards, reflecting groupings which are already widely used in institutions. These are:

- the institutional context relating to quality and standards
- student admission, progression and completion
- assurance of academic quality and standards
- quality and enhancement of learning opportunities.

27. The four categories mirror much of the content in the QAA's 'Code of Practice for the assurance of academic quality and standards in higher education'. The Code identifies a comprehensive series of system-wide expectations covering matters relating to the management of academic quality and standards in higher education. The Task Group believes that cross-referencing in this way between the portfolio categories for information and the QAA's Code of Practice will help institutions by providing a consistent approach, which can then form the basis for discussion within institutional audits. At several points later on in this document, reference is made to sections of the Code which are particularly relevant, although for the wider purpose of institutional audit all sections of the Code will need to be addressed. As emphasised in HEFCE 01/45, neither the code nor the portfolio categories are prescriptive. Their purpose is to provide a set of common reference points to facilitate structured discussion.

Question 4: Do you agree that there should be four main categories for collecting information about quality and standards, as set out in paragraph 26?

28. The following paragraphs consider each category in turn.

Institutional context of quality for teaching and learning

29. The internal information providing the institutional context would cover :

- a. The institutional mission statement.
- b. The sections of the HEI's corporate plan that are relevant to teaching and learning. All HEIs currently provide a corporate plan to the HEFCE on a three-year cycle.
- c. Quality assurance policies and processes, as set out in the HEI's own handbooks and guides for staff and students, including internal codes of practice.
- d. The HEI's learning and teaching strategy, as submitted to the HEFCE under the Teaching Quality Enhancement Fund (TQEF); and outcomes of periodic reviews of progress in implementing and updating the strategy.

Question 5: Are the documents listed in paragraph 29 the right ones to describe the institutional context for quality and standards?

Student admission, progression and completion

30. Admissions information would comprise the following data on the student profile:
- a. Students' qualifications on entry.
 - b. Range of entrants classified by age, gender, ethnicity, socio-economic background, disability and geographical origin, as returned to HESA.
31. Data collected by HESA on entrants to HE are comprehensive and of high quality. The Group considered whether information from UCAS about student applications to HE should also be included in the data set. It concluded against, because fewer than half of all entrants to HE submit their applications through the UCAS system, which is focused on applicants to full-time first degree programmes, rather than part-time or postgraduate students.
32. Student progression and completion information would comprise data on rates and trends in terms of:
- a. Progression and retention for each year of each course/programme, differentiating between failure and withdrawal.
 - b. Completion of the programme.
 - c. Qualifications awarded (certificate, diploma and degree results, including classifications where relevant).
 - d. Number and percentage of graduates' first destinations (employment and further study).
33. All the data in paragraphs 30 and 32 are already collected by HEIs for return to HESA, so their use for this purpose will not constitute a new burden.
34. The Group considered whether paragraph 32a above should include information about transfers into and out of programmes between HEIs. It concluded against, because the data on transfers of students between institutions are often not particularly well-structured, and are thought to be less reliable than other sections of the student record.
35. In relation to paragraph 32d, the Group noted that HESA is currently consulting on the outcomes of a review of the collection methodology for the First Destination Supplement to the student record (the FDS). Decisions on the information that will be requested on graduate destinations will be taken once the outcome of that consultation is known. One possibility is a follow-up survey of leavers after a further two years, to supplement the information collected by the current survey six months after graduation, although the expectation is that that would not lead to publication of data at institutional level.

Question 6: Are the data in paragraphs 30 and 32 the right data to have available internally, and discuss as part of institutional audit, in relation to student admission, progression, completion and employment?

Assurance of academic quality and standards

36. The Task Group noted that assurance of academic quality and standards was at the heart of what the QAA sought to review through institutional audit, and that the expectations and guidance relating to that assurance were already comprehensively discussed in the QAA's Code of Practice. The sections of the code relating to programme approval, monitoring and review, and to student assessment and external examining, are particularly relevant.

37. The Group felt that the following information should be available internally as a basis for institutional audit discussions:

Programme approval, monitoring and review

- a. Programme specifications, prepared in the light of the QAA guidance, setting out intended learning outcomes, learning and teaching methods to support achievement of outcomes, and assessment methods demonstrating student achievement.
- b. A statement of the respective roles, responsibilities and authority of different bodies within the HEI involved in programme approval and review.
- c. Key outcomes of programme approval, and annual monitoring processes.
- d. Periodic internal reports of major programme reviews (normally undertaken every five years or so).
- e. Reports of periodic internal reviews by departments or faculties.
- f. Accreditation and monitoring reports by professional or statutory bodies.

Assessment

- g. Assessment strategies, processes and procedures.
- h. The range and nature of student work.
- i. External examiners' reports, an analysis of the findings of those reports, and the actions taken in response.
- j. Reports of periodic reviews of the appropriateness of assessment methods used.

Student satisfaction, covering the views of students, on:

- k. Arrangements for academic and tutorial guidance, support and supervision.
- l. Library services and IT support.
- m. Suitability of accommodation, equipment and facilities for teaching and learning.
- n. Perceptions of the quality of teaching and range of teaching and learning methods.
- o. Assessment arrangements.
- p. Relevance of the course to further study and prospective employment.
- q. Quality of pastoral support.

Question 7: Are the headings in paragraph 37 the right ones to use for information on assurance of academic quality and standards?

Quality and enhancement of learning opportunities

38. Institutions already collect and analyse a wide range of information in order to satisfy themselves that the quality of their provision is as they would wish it to be. That too will be an important aspect of institutional audits in the future, for discussion between the QAA and the HEI in the light of the precepts and guidance in the QAA Code of Practice.

39. The Task Group would expect information about the following to be available to teams undertaking HEIs' own internal reviews of their quality and standards:

- a. The effectiveness of teaching and learning, in relation to programme aims and curriculum content as they evolve over time.
- b. The range of teaching methods used.
- c. The availability and use of specialist equipment and other resources and materials to support teaching and learning.
- d. Staff access to professional development to improve teaching performance, including peer observation and mentoring programmes.
- e. The use of external benchmarking and other comparators both at home and overseas.
- f. The involvement of external peers in the review method, their observations, and the action taken in response.

Question 8: Are the items listed in paragraph 39 the right ones for HEIs to consider in internal reviews of quality and enhancement of learning opportunities?

Other information

40. The Task Group noted that, in addition to the information recommended above generated by the HEI, there would be other information available to institutional audit teams drawn from a variety of sources, notably:

- the institution's self-evaluation documents
- reports from previous QAA activities, at both institutional level and subject level, all of which have been published
- accreditation reports by professional and statutory bodies, some of which are published
- information directly acquired during the institutional audit visit.

Part B: Sub-set of information for publication

41. Within the range of information described above, the sub-set which should be published has to be defined with a view to meeting public information needs. Stakeholders, particularly students and employers, want information that is up-to-date, consistent and reliable about the quality and standards of teaching and learning at different HEIs and in different subjects. The published information has to be synthesised and summarised, so that it does not overwhelm users with excess detail, but without reducing it so much that it becomes over-simplified to the point of being misleading.

42. Data on the student profile for inclusion in the HEI's internal information portfolio were identified in paragraphs 30 and 32. Quantitative data on student admissions, progression, completion and employment are already published, and so would not represent a further burden on HEIs. The Task Group concluded that the information most relevant to quality and standards of learning and teaching was:

- a. HESA data on student entry qualifications (including A-levels, access courses, vocational qualifications, and Scottish Highers).
- b. Performance indicators and benchmarks published by the HE funding bodies on progression and successful completion for full-time first degree students (separately for progression after the first year, and for all years of the programme).
- c. HESA data on class of first degree, by subject area.
- d. Performance indicators and benchmarks published by the HE funding bodies on first destinations/employment outcomes for full-time first degree students. As with progression and completion data, these are produced for the whole institution, and apply to full-time students only.

43. The Group recognised that there are concerns about the use of the items in paragraph 42a and 42c. Entry qualifications are widely used in newspaper league tables, and may be misunderstood as meaning that high entry qualifications are themselves an indicator of high quality of the HEI's programmes. The Group accepts that no such correlation can be assumed. In principle, measures of value-added might be preferable, focusing on the progress students make by the end of their programme, irrespective of their qualifications on entry. But such an approach raises difficulties of definition in practice; and in the absence of reliable, widely-accepted value-added indicators at present, the Group concluded that data on entry qualifications are legitimate contextual information for discussions about quality and standards. Similarly, the Group recognised the concern that, if too much weight is placed on degree classes, HEIs would have an incentive to increase the proportion of students awarded higher classes of degree. However, one purpose of the external examiner system is to safeguard against such grade inflation. And since such information is published in any case, it would be perverse to ignore it in discussions about quality and standards.

44. In addition to these data, there is a wide range of statistical information published in the Higher Education Management Statistics (HEMS) reports. This provides valuable contextual information relevant to quality and standards, such as staff:student ratios and expenditure on library and computing services.

Question 9: Are the data in paragraph 42 the appropriate quantitative indicators to include in the published data set?

45. The Task Group discussed in detail what qualitative information it would be appropriate to publish, recognising that this raises a range of sensitive issues. The following section sets out the options considered.

External examiners' reports

46. External examiners are a long-established and well-regarded part of HE quality assurance. They are appointed to all first and higher degree courses, and to individual modules within modular programmes. They already provide an annual report to the HEI on whether levels of student achievement on the programme/module are assessed in a manner consistent with sector-wide expectations of standards in that subject. In many cases, they also comment on strengths and weaknesses of programmes revealed through the assessment process. All HEIs have methods for considering, and responding to, external examiner reports. In many cases, the HEI's senior management team considers the reports and responses from programme teams or faculty boards. So there is in place a comprehensive method for reviewing outcome standards, and it should be possible to draw on this to provide published information for stakeholders.

47. The Task Group recognised that some in the HE sector feel that any publication of examiners' reports could damage the relationship between HEIs and their examiners, reducing the inclination to be frank and honest, and introducing a potentially adversarial element. Some HEIs are already reporting difficulties in finding enough examiners of the right calibre, and are concerned that that could be exacerbated if additional responsibilities are assigned to them. The Group concluded, however, that the gain in openness outweighed the potential cost, and that the system should be strong enough to cope.

48. Current practice in appointing external examiners, the training they are given, the content and nature of reports they are asked to provide, and the form of follow-up by the HEI, all vary between HE institutions. Given the central importance of the external system in safeguarding standards, and its proposed new role in providing public information, greater consistency is needed so that current best practice is generally applied. The section of the QAA Code of Practice which covers external examining provides a good basis for securing such consistency. That section of the Code will be used to inform discussion between the QAA and each HEI, as one part of institutional audit.

49. The options for publication of external examiners' reports are:

a. To publish all reports in full. That would maximise transparency, by giving students, employers and others a more or less detailed account of standards in each programme. But it would carry a serious risk of significantly reducing the frankness, and therefore the usefulness, of external examiner reports. The volume of information provided would be substantial – tens of thousands of reports every year. And much of that information would be of limited use to external audiences because it is necessarily detailed and technical.

b. To require external examiners to prepare a summary of their reports for publication, while keeping the full report confidential to the institution. This should ensure that external examiners would still be willing to prepare frank reports, but also that the summary would be a fair reflection of the full report, rather than the HEI's interpretation of it. This option would still affect the relationship between the HEI and external examiners, because the examiner's conclusions in the summary would carry a new significance for the institution's reputation. The core of the summary might be a statement confirming (or otherwise) that the standards of student achievement on each programme are appropriate for the qualification awarded by the HEI; that standards of student performance are comparable with similar programmes at

other institutions; and that processes for assessment are sound and have been conducted fairly. This judgement would be made in the light of the QAA's subject benchmarks, the national qualifications framework, institutional programme specifications, and other relevant information. The summary might in addition comment briefly on key strengths of the programme, as revealed through the assessment of students' work, and areas requiring improvement. For modular programmes, the summary statement might be compiled by the Chief External Examiner in the light of reports on individual modules.

c. To keep all external examiners' reports confidential, but require each course team to prepare a summary of the report for publication. This has the advantage of leaving the relationship between examiner and HEI unaffected. But the downside is that others would then be interpreting what examiners had said, with the inevitable temptation to gloss over criticisms, and a risk of dispute between course teams and examiners.

Question 10: Do you agree with the Task Group recommendation that option b in paragraph 49 should be adopted, namely that summaries of external examiners' reports should be published?

Actions in response to examiners' reports

50. It would be possible to publish summaries of external examiners' reports without any commentary by the HEI. That would minimise the burden for HEIs. At present, HEIs do not publish any such commentary, and preparing such a text for publication would be a significant new task. On the other hand, such a commentary could provide an opportunity for the HEI to set reports in context, and to show how the institution was addressing any major issues raised. All HEIs have internal mechanisms for considering external examiners' reports, and deciding action to be taken, so the raw material for preparing commentaries is already there. There may, moreover, be cases where the HEI disagrees with the examiner's summary, and wishes to provide its own explanation.

51. The options are:

a. To expect each HEI to prepare a response for publication at programme level, to match each external examiner's summary. This would provide greatest transparency. And in some respects it would minimise the additional burden, because it is already common practice for course teams to provide a response to examiners' reports (albeit not currently for publication). But the risk is that a welter of technical information would be provided (for example about marginal adjustments to assessment mechanisms or curriculum content), in which significant trends and developments would be obscured.

b. To expect each HEI to prepare a response for publication at subject area level, which would give an overview of themes from the aggregate of external examiners' reports in that subject area, and significant actions to be taken. This would produce a more manageable volume of published information, better focused on key themes of interest to students and others. But it would be a task which departments do not necessarily undertake now, and so would constitute a new burden.

c. To expect each HEI to prepare a response for publication at whole institution level, with a higher level overview of themes and responses. Both pros and cons are an

intensification of option b. The pros would be a single, manageable report for each institution offering a considered analysis which could pick up cross-institution themes and follow-up actions, as well as significant items at subject or programme level. But it would represent a significant new task, and there is a risk of the conclusions being generalised to such a high level that the information would be of limited use to external audiences.

d. To leave the publication of a commentary as a voluntary option for each HEI to pursue if it judges that desirable, and in whatever format it judges best. This would minimise the additional burden on HEIs, and ensure that commentaries were focused on those aspects which the HEI considered worth reporting on, rather than reports for the sake of it.

Question 11: Do you agree with the Task Group recommendation that option d in paragraph 51 is the best way forward – that it should be an option for HEIs to publish commentaries on external examiners' reports if they wish?

52. The Group recognises that a number of associated questions and implications arise from the recommendations on external examiners' reports, for example about examiners' workload and remuneration, the application to modular courses, and how any disputes between examiner and institution might be resolved. The section of the QAA's Code of Practice on external examining provides guidance on some of these issues, and is the mechanism through which the Group believes consistency in approach would best be pursued.

Student satisfaction surveys

53. Feedback from students is widely recognised as being a valuable measure of the quality of programmes, because it provides direct evidence of what the 'customers' think of the quality of the experience they are getting. It is by no means the only measure. Other mechanisms for obtaining student feedback include representation on committees or focus group discussions. But it is already common practice for HEIs to conduct student feedback surveys through questionnaires, normally at programme level, with the results being considered by programme teams. The results are generally not designed to be comparable even between departments within an HEI, let alone between HEIs, because their main purpose is improvement of individual programmes. Some institutions also use 'vertical' questionnaires to gauge student opinion of common services, such as library or IT facilities. The existing use of questionnaires in HEIs means that the collection of data would not in itself constitute a new burden. However, the preparation of results for publication would be a new task for most HEIs, and greater standardisation of approach would entail significant changes in practice.

54. The options are:

a. To leave each HEI to decide for itself in what form it administers questionnaires and publishes the results. This would minimise any additional burden on the HEI, since it could carry on using existing instruments and publishing whatever it currently feeds back to students within the institution by way of results. But there would be no comparability between HEIs in what was published.

b. To recommend a standard core of elements which all HEIs would be expected to adopt, while leaving discretion as to any supplementary information which HEIs may want to

collect for their own purposes. To help ensure consistency, the core might cover guidance on:

- i. Key questions to be asked about the quality of the student experience: for example, on quality of teaching, quality of tutorial support, usefulness and promptness of feedback on assessments, and availability of learning resources.
 - ii. The level of aggregation of results. One model is questionnaires administered consistently across the whole institution by a central unit, but with results disaggregated to programme level as a service to programme teams for them to consider the results.
 - iii. The balance of quantified data and free-form comment. The questionnaires would need to include multiple-choice questions to generate consistent, quantified data. But some of the most useful results for individual programme teams are gained from free-form comments in which students can describe the factors which they feel are most important, and why.
 - iv. The format in which results should be reported – for example, quantified results for each of the core questions at programme level.
 - v. The level of institutional commentary. The considerations here are similar to those for commentaries on external examiners' reports. If the questionnaire results are published, it might seem a wasted opportunity if the institution did not publish simultaneously a commentary giving context and follow-up actions. Indeed, students may not be willing to spend time completing questionnaires if the institution does not then report back the actions taken in response to address areas of concern. That might best be done at subject level, as giving the best balance between excessive detail if published at programme level and excessive generalisation if published at institution level.
- c. To administer a national student feedback questionnaire, on the model currently used in Australia, which is administered annually through HEIs to students who have just graduated, rather than to students currently on courses. This option would allow for a common core, with institutions supplementing if they wished. Both sector-wide trends and individual institutional results would be published. The advantage would be to maximise comparability and consistency of reporting. The downsides would be a greater intrusiveness than an institutionally administered system, and it would be harder to generate institutional commentaries to show what follow-up action each was taking.

55. The Task Group was aware that HESA issued in October a consultation paper presenting the outcomes from the fundamental review of the First Destination Supplement (FDS) to the student record, and inviting comments on proposals for reform of the survey. The proposals included changes to the coverage of the record and, more specifically, sought views on whether the survey should in future ask graduates about the skills gained from their programmes and satisfaction with their institution/course.

56. HESA invited responses by 16 November. A full analysis of results is not yet available. But the initial assessment identified widespread concerns that including satisfaction questions would make the survey a different type of instrument, and would significantly add to the workload of the careers guidance offices who normally administer it. Most responses are currently obtained by telephone interview rather than postal questionnaires, and the inclusion of subjective questions might make interviewing more difficult, particularly where (as happens in many cases now) the information is provided by someone other than the graduate - eg their parent or flatmate. In order to generate robust employment data, the collection methods for the survey have been greatly strengthened over the past two years, and there would be concern if expansion of the survey put at risk the current 80 per cent response rate. On the other hand, the FDS is a now a well-established and more robust survey instrument. Given the intention to extend it significantly in any case to capture more information about the nature of graduates' employment, it would seem preferable to build on the survey in order to obtain nationally consistent data on student satisfaction rather than introduce a wholly new survey alongside it.

57. In the light of these considerations, the Task Group concluded that the best approach would be a combination of:

- a. Extending the FDS to collect nationally consistent feedback data on the views of recent graduates about their programmes.
- b. Individual HEIs continuing to administer their own surveys to collect information for use at programme level. This is important in order to collect the views of students while still on courses.

58. If this approach is accepted, more work would be needed to identify what questions should be asked through the FDS, in order to ensure some degree of consistency and comparability, and how to derive more comparable information from HEIs' own surveys. On the latter question, the first step should be to commission a review of current practice and recommendations for the best way of proceeding.

Question 12: Do you agree with the Task Group recommendation that the combination of options in paragraph 57 is the best way forward – that is, to use the FDS to collect the views of recent graduates, with HEIs continuing to conduct their own surveys but on a more consistent basis?

Strategy for raising teaching quality

59. The Task Group considered that HEIs should publish some form of statement which provides an assurance that the HEI has a considered improvement strategy, which is kept under review and is delivering results, and which is focused on enhancing the quality of learning and teaching. These issues will be at the heart of the QAA's institution-wide audit reviews, which will entail the HEI producing a self-evaluation document as the first step in preparing for the audit visit.

60. The Group considered whether the self-evaluation document should itself be published, but concluded against. The grounds are similar to those above about the publication of external

examiners' reports, namely that it would risk compromising the institution's willingness to offer a frank 'warts and all' self-appraisal, which is fundamental to the effectiveness of the audit method.

61. The statement might cover:

- a. A summary of the institution's learning and teaching strategy, as presented to the HEFCE under the Teaching Quality Enhancement Fund programme. The original strategies covered a three-year period, and progress in implementing them has been reported annually through annual operating statements.
- b. The main targets, actions and milestones in that strategy.
- c. Progress in achieving the targets, drawing on the material already assembled by HEIs to prepare their annual operating statements.

62. Peer observation of teachers by their colleagues while they are teaching is a powerful mechanism for securing improvement in the quality of teaching. The Task Group has considered whether the results of peer observation schemes should be published, but concluded against. At its best, teaching observation by peers is a developmental activity, in which peers can openly discuss strengths, weaknesses and development priorities without feeling that they are being publicly judged in a way that will affect their reputations and careers. It would require a fundamental change to most current observation systems before they could generate publishable information, because the conclusions reached would have to be fully evidenced, with appeal mechanisms and so on. Some student feedback questionnaires already ask for students' views on quality of teaching, in a form that could be published generically and without identifying individuals.

63. The Task Group saw no case for expecting such a statement of learning and teaching strategy for each programme. That would produce more information than is useful for anyone. And there would be substantial overlap between the statements, because many enhancement activities operate across the department, faculty or whole institution.

64. On the basis of the above, the options are:

- a. A statement at whole institution level. This would minimise the additional burden for HEIs, because they already have a learning and teaching strategy for the whole institution (submitted in response to the HEFCE TQEF programme), which is reviewed annually. It would also link well with the preparation of self-evaluation documents, since it could be extracted from material already collected for self-evaluation. It would maximise the chances of considered, whole-institution analysis of strategies and their impact. On the other hand, the statement might be so high level as to be unhelpfully generic.
- b. A statement at subject area level. This would be less generic, and some audiences might well find a broad subject-based breakdown helpful. In particular, the LTSN subject centres could use the statements as a basis for more active dissemination and discussion of enhancement activities. Students and employers might also find subject-based statements more useful as a guide to the actions being taken that will directly affect the matters they are interested in. Over time that might be the right direction to move in. However, the downsides are that it would represent more of a burden; there could be significant overlap between the

statements from different subject areas; and cross-cutting institutional enhancement activities would be harder to report.

Question 13: Do you agree with the Task Group recommendation that option a in paragraph 64 – publication of learning and teaching strategy statements at the whole institution level – is the preferred approach?

65. The next question is whether it is appropriate to expect such a statement to be published annually, because enhancement strategies should look several years ahead and significant change is not necessarily to be expected every year. If statements were published on a three-year cycle, that could helpfully dovetail with the cycle of preparation for institution audit, if that is three years in the first instance and six years in steady state (the Group recognises that that is an issue still for decision in the light of responses to consultation paper 01/45, which proposed a steady state cycle of five years). It would also mesh with the cycle for preparing TQEF strategies, if the current three-year programme is repeated.

Question 14: Do you agree with the Task Group recommendation that statements of learning and teaching strategies should be published to dovetail with the cycle for institutional audit?

Annual programme monitoring and periodic major programme reviews

66. A wide array of information is already available within HEIs from their routine annual monitoring of programmes, and the more detailed reviews of programmes normally undertaken every five years or so. At present this is not made publicly available, but it could provide valuable information for external audiences about the HEI's own assessment of its programmes.

67. This issue needs to relate closely to the previous one, because institution-wide enhancement strategies should be informed by monitoring and review. Enhancement priorities should be set in the light of the HEI's examination of the effectiveness of its current programmes, and then subsequent programme monitoring and review should be a primary means of testing whether the enhancement activities are working. The Task Group would encourage the involvement of external peers, chosen by the HEI, as standard practice in periodic major programme review or faculty-wide reviews. But as with external examiners' reports, the Task Group would not recommend the publication of internal review reports, because that would reduce their frankness and therefore their usefulness to the HEI.

68. The options are:

a. To publish summary statements for each programme. Evidence shows that potential students are primarily looking for information at programme level, and this could be a means of providing a regularly updated summary of the HEI's own assessment of how well the programme is working, and how it will be developed. This might link to – or even become part of – the programme specification. The HEI will need to keep the specification under review in any case, since it is in effect the prospectus of what the student can expect if they enrol on that programme at that HEI. Through HEI web-sites, the inquirer could then see side by side the programme specification setting out objectives, methods and content, with a summary of the results of internal monitoring and review. The downside is that it could result

in more detail than anyone would want, and of a rather technical nature concerned with the micro-design of programmes.

b. To publish summary statements for each subject area. The advantages would lie in the volume of information being easier to handle; the increased likelihood of more significant, cross-cutting issues being identified; and some alignment with the periodic faculty reviews which some HEIs undertake. The disadvantage would be the creation of a significant new burden. Although many school/faculty boards would normally review the range of programme monitoring results, it may not be common practice to do so in a way that would lend itself to providing a summary for publication.

c. To publish summary statements at whole institution level. This does not look sensible, because the reports would lose all significant detail, given that the unit of review is the individual programme. The aggregation of results to whole institution level would be a major exercise, which is unlikely in itself to achieve substantive enhancement of quality.

Question 15: Do you agree with the Task Group recommendation that option a in paragraph 68 should be pursued, namely that the results of annual monitoring and periodic major programme reviews should be summarised at programme level in association with programme specifications?

Employers' views

69. The Task Group considered whether it would be useful to publish information about the results of, and actions taken in response to, employers' views on the recent graduates they have recruited. The practicality and value of this are debatable, because:

a. It would be time consuming and expensive to do on any consistent, valid and comprehensive basis. Some HEIs have extensive procedures for inviting, and then analysing, employers' views on their graduates, across the range of subject areas. But that may not be widespread practice at present so, unlike the previous items, there may be little existing information to build on. And the range of employment into which graduates go is so varied that constructing a valid employer sample would be difficult.

b. It would substantially overlap other information. The FDS already identifies graduates' success in finding employment, which is a primary measure of whether employers wish to recruit them. If, as recommended above, the FDS is extended to include the views of recent graduates on their HE experience, it could also include one or more questions on how well those graduates feel that they have been prepared for employment.

c. To be useful in promoting enhancement at individual programme level, the information would have to be detailed – identifying perceived strengths and weaknesses in each of a range of employment-related competences. What that signifies will vary greatly, with a focus on preparation for specific professional practice in some areas, and a much broader concern with generic skills in others.

d. Existing accreditation systems by professional and statutory bodies (PSBs) will continue as now. The success or otherwise of a programme in achieving accreditation is a

direct measure of whether or not it is judged suitable to prepare students for professional practice. If employers see problems with the quality or standards of vocational programmes in preparing students for professional practice, they should be taking that up with the PSB.

70. On the other hand, the effectiveness of programmes in preparing students for employment is an important indicator of quality and standards, so information about that aspect should be available, if feasible. Possible approaches are:

a. To treat this as one aspect of the HEI's enhancement strategy. The HEI could then include – within the enhancement statement discussed above – a summary of how it goes about engaging with employers, identifying their needs, and then reflecting those needs in the design and delivery of programmes.

b. To treat this as one aspect of programme specifications. The specifications should already state programme objectives and methods in relation to the acquisition of employment-related knowledge, skills and understanding; and, for relevant programmes, whether they are accredited by the relevant PSB. That section of the specification could readily include material on how the institution identifies employer needs and opinions so as to ensure that relevant programmes do effectively prepare students for employment.

c. To undertake periodic national surveys of employer opinion. This might be something that UUK and SCOP could best administer on behalf of the sector. A limited national sample would be used, which would not attempt disaggregation by HEI, let alone by individual programme. Its purpose would be to inform HEIs generally about employers' views. The risk is that the results would perpetuate the widely-recognised problems in this area: that different employers have different views, depending on the types of graduate they want, the skills and competences they are looking for, their own attractiveness to graduates, the economic sectors they are in, and the effectiveness of their own methods for recruiting and developing staff.

Question 16: Do you agree with the Task Group's recommendation that both options a and b in paragraph 70 should be pursued: that is, that summary material on employers' views should be included in HEI learning and teaching strategy statements and programme specifications; and that further consideration should be given to whether a useful national survey could be designed (option c) to supplement other forms of information?

Invitation to respond and next steps

71. The Task Group would welcome responses to this consultation paper. To assist the analysis of responses it would be helpful if they could be structured to address the questions listed in the text, which are repeated here.

Question 1: Do you agree with the purposes and principles of information collection and publication set out in paragraphs 18 - 20? Are there others that should be added?

Question 2: Do you agree that the classification system for the collection and publication of information at the intermediate level between the whole institution and the individual programme should be the 19 JACS subject areas?

Question 3: Do you agree with the portfolio concept – a set of defined categories of information within which each HEI collects information to suit its own needs and circumstances?

Question 4: Do you agree that there should be four main categories for collecting information about quality and standards, as set out in paragraph 26?

Question 5: Are the documents listed in paragraph 29 the right ones to describe the institutional context for quality and standards?

Question 6: Are the data in paragraphs 30 and 32 the right ones to have available internally, and discuss as part of institutional audit, in relation to student admission, progression, completion and employment?

Question 7: Are the headings in paragraph 37 the right ones to use for information on assurance of academic quality and standards?

Question 8: Are the items listed in paragraph 39 the right ones for HEIs to consider in internal reviews of quality and enhancement of learning opportunities?

Question 9: Are the data in paragraph 42 the appropriate quantitative indicators to include in the published data set?

Question 10: Do you agree with the Task Group recommendation that option b in paragraph 49 should be adopted – namely that summaries of external examiners' reports should be published?

Question 11: Do you agree with the Task Group recommendation that option d in paragraph 51 is the best way forward – that it should be an option for HEIs to publish commentaries on external examiners' reports if they wish?

Question 12: Do you agree with the Task Group recommendation that the combination of options in paragraph 57 is the best way forward – that is, to use the FDS to collect the views of recent graduates, with HEIs continuing to conduct their own surveys but on a more consistent basis?

Question 13: Do you agree with the Task Group recommendation that option a in paragraph 64 – publication of learning and teaching strategy statements at the whole institution level – is the preferred approach?

Question 14: Do you agree with the Task Group recommendation that statements of learning and teaching strategies should be published to dovetail with the cycle for institutional audit?

Question 15: Do you agree with the Task Group recommendation that option a in paragraph 68 should be pursued, namely that the results of annual monitoring and periodic major programme reviews should be summarised at programme level in association with programme specifications?

Question 16: Do you agree with the Task Group's recommendation that both options a and b in paragraph 70 should be pursued: that is, that material on employer views should be included in HEI learning and teaching strategy statements and programme

specifications; and that further consideration should be given to whether a useful national survey of employer views could be designed to supplement other forms of information (option c)?

72. Comments should be sent **by Friday 21 December 2001** to:

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73. In the light of responses to this consultation, the Task Group will prepare a final report to the HEFCE, QAA, UUK and SCOP, who will together consider its recommendations.