

3.2 Developments in Britain

Here we look at the 'academic infrastructure', its components and their evolution, and emerging developments following the May 2010 election of a coalition Conservative-Liberal-Democrat Government.

3.2.1 The 'Academic Infrastructure'

The UK's 'Academic Infrastructure' (refer to Box 2 in part 1) derives from the recommendations of the 1997 (Dearing) Report of the National Committee of Inquiry into UK Higher Education. It comprises a national qualifications framework, subject benchmark statements, program specifications, and a code of practice. Universities and other higher education institutions also make use of external examining arrangements relating to the Academic infrastructure and their own academic orientations.

The Code of practice for the assurance of academic quality and standards in higher education

The *Code of practice* sets out guidelines on good practice relating to the management of academic standards and quality. Each section of the *Code of practice* has precepts or principles that institutions should satisfy, with guidance on how they might meet these precepts. The *Code* has 10 sections:

- postgraduate research programmes;
- collaborative provision;
- students with disabilities;
- external examining;
- academic appeals and student complaints on academic matters;
- assessment of students;
- programme approval, monitoring and review;
- career education, information and guidance;
- placement learning;
- recruitment and admissions.

A serious challenge to the transparency and reliability of the operation of the Academic infrastructure was raised by the House of Commons Select Committee on Innovation, Universities, Science and Skills in 2009 (see Box 13). The select committee called for a more rigorous and nationally consistent approach to academic standards.

Box 13. Recommendations of the House of Commons IUSSC, 2009

"While we celebrate and encourage the diversity of the higher education sector in England, it is our view that there need to be some common reference points. We consider that standards have to be capable of comprehensive and consistent application across the sector.

The Quality Assurance Agency for Higher Education (QAA) should be responsible for maintaining consistent, national standards in higher education institutions in England and for monitoring and reporting on standards.

We conclude that the reformed QAA's new remit should include the review of, and reporting, on the quality of teaching in universities and, where shortcomings are identified, ensuring that they are reported publicly and addressed by the institution concerned.

We recommend that all higher education institutions in England have their accreditation to award degrees reviewed no less often than every 10 years by the reformed QAA. Where the Agency concludes that all or some of an institution's powers should be withdrawn, we recommend that the Government draw up and put in place arrangements which would allow accreditation to award degrees to be withdrawn or curtailed by the Agency.

We recommend that the reformed QAA have powers to carry out reviews of the quality of, and standards applied in, the assessment arrangements for an institution's courses, including, if necessary, its degree awarding powers, in response to external examiners' or public concerns about the standards in an institution or at the direction of the Secretary of State."

House of Commons Innovation, Universities, Science and Skills Committee (2009).

The Select Committee drew attention to the limited role of the Quality Assurance Agency for Higher Education (QAA), noting that the QAA's purpose, in its own words, is "to safeguard the public interest in sound standards of higher education qualifications and to inform and encourage continuous improvement in the management of the quality of higher education." The QAA pointed out in its written evidence to the Committee that:

"The primary responsibility for academic standards and quality rests with individual institutions. QAA reviews and reports on how well they meet those responsibilities, identifies good practice and makes recommendations for improvement. We visit institutions to conduct our audits, make judgements and publish reports, but we are not an inspectorate or a regulator and do not have statutory powers. We aim to ensure that institutions have effective processes in place to secure their academic standards, but we do not judge the standards themselves."

However, noting ambiguity about the variability of degree attainment and the interests of students in knowing the relative value of their qualifications in a more contested market, the select committee proposed that the QAA should be reformed and re-established as a Quality and Standards Agency with the responsibility for monitoring and reporting on standards, and "consistent" standards across all higher education institutions:

"We consider that so long as there is a classification system it is essential that it should categorise all degrees against a consistent set of standards across all higher education institutions in England. Such work will need to build upon work previously undertaken by the QAA and other bodies with responsibilities for accreditation of degrees such as those in engineering."

Additionally the select committee suggested that in its view "consistency" of standards ought to apply not only at the threshold level but for "the comparison of excellence":

"the argument was put forward that minimum standards, not comparability, was the issue. We fail to see why minimum standards should be a substitute for the comparison of excellence. Both are important... We have concluded that the QAA should be responsible for maintaining consistent national standards."

In this context, there is a noticeable shift in the policy position of the QAA, from its 2006 acceptance of differences in graduate attainment to its 2009 insistence of the need for "broad comparability":

"It cannot be assumed that students graduating with the same classified degree from different institutions having studied different subjects, will have achieved similar academic standards... that students graduating with the same classified degree from a particular institution having studied different subjects, will have achieved similar academic standards... or that] students graduating with the same classified degree from different institutions having studied the same subject, will have achieved similar academic standards."
(Quality Assurance Agency for Higher Education, 2006b)

"We fail to see why minimum standards should be a substitute for the comparison of excellence. Both are important... We have concluded that the QAA should be responsible for maintaining consistent national standards."

“While the freedom of institutions to design and run their own courses is important, it is equally important that degrees from different institutions across the UK are broadly comparable.” (Quality Assurance Agency for Higher Education, 2009)

Nevertheless, there remains some confusion in the policy approach and in the use of terminology, as discussed at 4.3.5 below. Now the QAA is asking the UK higher education sector to give its views on the Academic Infrastructure as part of a major evaluation it is launching in 2010. The purpose of the evaluation is to establish whether the Academic Infrastructure is meeting its aims, whether it remains ‘fit for purpose’ and whether it is flexible enough to accommodate future developments in higher education (QAA, 2010). The external examining arrangements are included in this evaluation.

3.2.2 Framework for higher education qualifications in England, Wales and Northern Ireland (FHEQ)

A national framework for higher education qualifications was proposed originally in the 1997 Dearing Report. The qualifications framework for England, Wales and Northern Ireland (FHEQ) was first published in 2001. It was developed and is maintained by the QAA. The main purposes of the FHEQ are outlined in Box 14.

Box 14. The purposes of the FHEQ

- Provide important points of reference for setting and assessing academic standards to higher education providers and their external examiners
- Assist in the identification of potential progression routes, particularly in the context of lifelong learning
- Promote a shared and common understanding of the expectations associated with typical qualifications by facilitating a consistent use of qualifications titles across the higher education sector.

QAA, (2008).

The FHEQ is not regarded as a regulatory tool but rather as a descriptive reference for higher education institutions, students and others:

“The FHEQ is an important reference point for providers of higher education. The FHEQ and associated guidance for implementation, has been written to assist higher education providers to maintain academic standards; to inform international comparability of academic standards, especially in the European context; to ensure international competitiveness; and to facilitate student and graduate mobility” (QAA, 2008).

The FHEQ is also used as a reference point in institutional audits and external reviews. QAA audit and review teams “examine the means which higher education providers use to ensure that their awards and qualifications are of an academic standard at least consistent with those referred to in the FHEQ” (QAA, 2008). However, the QAA makes it clear that in external audit and review of the ways by which higher education providers check the alignment between the academic standards of their awards and the FHEQ levels, “the FHEQ should be regarded as a framework, not as a straitjacket” (QAA, 2008).

...the FHEQ does not adopt a common competency-based and decontextualised view of learning but rather understands higher education qualifications to represent integrated higher order learning.

The qualification descriptors in the FHEQ set out the generic outcomes and attributes expected for the award of individual qualifications. Unlike national qualifications frameworks in Australia, Scotland and elsewhere,¹³ the FHEQ does not adopt a common competency-based and de-contextualised view of learning but rather understands higher education qualifications to represent integrated higher order learning:

“The qualification descriptors contained in the FHEQ exemplify the outcomes and attributes expected of learning that results in the award of higher education qualifications. These outcomes represent the integration of various learning experiences resulting from designated and coherent programmes of study. These qualifications, which develop graduates with high-level analytical skills and a broad range of competences, are therefore distinct from training or solely the acquisition of higher level skills” (QAA, 2008).

In the effort to achieve consistency in the use of qualifications titles, while recognising differences in learning volumes and intended outcomes, the FHEQ allows for some mix of levels for a given title. For example, a professional doctorate program, while classified to FHEQ Level 8, may involve up to one third of study at Level 7. Similarly, an Integrated Master’s degree typically involves 25% of study and Level 7 and 75% of study at Level 6. This approach is rather confused in two respects. First, the purpose of levels is to describe the learning outcomes expected of a graduate’s exit level of capability, not the mix of learning challenges along the way. Second, it becomes difficult to identify the equivalence of a qualification whose learning outcomes are expressed across more than one level. This matter is important in determining suitability for employment and further learning, and for recognition of prior learning and credit transfer. A sounder approach would be to allow for multiple qualification types and titles within a defined level of expected learning outcomes.

The English solution to the problem in this regard, though it is only a partial one, involves the use of complementary references to identify the learning outcomes expected for a particular qualification awarded by a particular university in a particular field of learning. Programme specifications and subject benchmark statements are the main complementary references:

“Programme specifications are one of a number of ways in which higher education providers are able to describe the intended learning outcomes. Subject benchmark statements represent general expectations about the standards of achievement and general attributes to be expected of a graduate in a given subject area. The qualifications frameworks provide information about the level and character of programmes leading to particular named awards. Programme specifications will reflect these general points of reference, but as they state the outcomes that should result from successful completion of an individual programme, they are a source of more specific information, particularly for prospective and current students” (QAA, 2006).

3.2.3 Programme Specifications

The 1997 Dearing Report stressed “the importance of clear and explicit information for students so that they can make informed choices about their studies and the levels they are aiming to achieve”. It recommended that “clear descriptions of programmes should be developed so that students are able to compare different offerings and make sensible choices about the programmes they wish to take” (Dearing, 1997). In 2000, the QAA issued its inaugural guidelines for programme specifications to be developed by each higher education provider for all of its award programs. The guidelines were revised in 2006 (see Box 15).

¹³ The New Zealand framework for describing levels of learning outcomes for Master and Doctorate degrees differs from the framework for describing vocational competencies.

Box 15. UK Programme Specifications

"Programme specifications are the sets of information that each institution provides about its programmes. Each specification clarifies what knowledge, understanding, skills and other attributes a student will have developed on successfully completing a specific programme. It also provides details of teaching and learning methods, assessment and subsequent career opportunities, and sets out how the programme relates to the qualifications framework. This information allows prospective students to make comparisons and informed choices about the programmes they wish to study and provides useful guidance for recruiters of graduates."

"In general, modules or other units of study have stated outcomes, often set out in handbooks provided by institutions to inform student choice. These intended learning outcomes relate directly to the curriculum, study and assessment methods and criteria used to assess performance. Programme specifications can show how modules can be combined into whole qualifications. However, a programme specification is not simply an aggregation of module outcomes; it relates to the learning and attributes developed by the programme as a whole and which, in general, are typically in higher education more than the sum of the parts."

QAA, 2006, and 2010.

Some programme specifications focus on the student audience and aim to help them to understand the teaching and learning methods that enable their intended learning outcomes to be achieved; the assessment methods that enable achievement to be demonstrated; and the relationship of the programme and its study elements to the qualifications framework and to any subsequent professional qualification or career path.

In other cases, programme specifications are used primarily as quality assurance documents, particularly in design, approval and review processes. For the purposes of audit and review, programme specifications are '...the definitive publicly available information on the aims, intended learning outcomes and expected learner achievements of programmes of study, and audit teams will wish to explore their usefulness to students and staff, and the accuracy of the information contained in them' (*Handbook for institutional audit: England and Northern Ireland, 2006*). Bearing in mind the part that programme specifications play in audit and review processes, the QAA advises that "it is important that they are fit for the purpose that they fulfil in each individual institution" (QAA, 2006).

The QAA does not prescribe any particular approach to or style of programme specification, but suggests that the following information will normally be included in a programme specification:

- awarding body/institution
- teaching institution (if different)
- details of accreditation by a professional/statutory body
- name of the final award
- programme title
- UCAS code
- criteria for admission to the programme

"Each specification clarifies what knowledge, understanding, skills and other attributes a student will have developed on successfully completing a specific programme. It also provides details of teaching and learning methods, assessment and subsequent career opportunities, and sets out how the programme relates to the qualifications framework."

- aims of the programme
- relevant subject benchmark statements and other external and internal reference points used to inform programme outcomes
- programme outcomes: knowledge and understanding; skills and other attributes
- teaching, learning and assessment strategies to enable outcomes to be achieved and demonstrated
- programme structures and requirements, levels, modules, credits and awards
- mode of study
- language of study
- date at which the programme specification was written or revised.

In addition, institutions may include information on:

- what makes the programme distinctive
- assessment regulations
- student support
- methods for evaluating and improving the quality and standards of learning, including consideration of stakeholder feedback from, for example, current students, graduates and employers.

Source: QAA (2006) *Guidelines for preparing programme specifications* (QAA 115 06/06).

3.2.4 Subject benchmark statements

Subject benchmark statements set out expectations about standards of degrees in a range of subject areas. They describe the conceptual framework that gives a discipline its coherence and identity, and define what can be expected of a graduate in terms of the techniques and skills needed to develop understanding in the subject. They also identify the level of intellectual demand and challenge represented by an honours degree in subject areas, and help higher education institutions when they design and approve programmes. Subject benchmark statements describe what can be expected of a graduate in terms of broad subject coverage and the techniques and skills gained at first degree (and sometimes Master's) level in a subject. They are developed by discipline communities and then reviewed by subject specialists and overseen by the QAA (QAA, 2004).

Subject benchmark statements set out expectations about standards of degrees in a range of subject areas.

QAA describes benchmark statements as follows:

"Subject benchmark statements provide a means for the academic community to describe the nature and characteristics of programmes in a specific subject. They also represent general expectations about the standards for the award of qualifications at a given level and articulate the attributes and capabilities that those possessing such qualifications should be able to demonstrate" (QAA, 2004).

The QAA represents subject benchmark statements not as prescriptive templates but as external references:

"Subject benchmarks statements are an important external source of reference for higher education institutions when new programmes are being designed and developed in a subject area. They are not

seen as prescriptive. They provide general guidance for articulating the learning outcomes associated with the programme but are not a specification of a detailed curriculum in the subject” (QAA, 2004).

The QAA also notes that Subject Benchmark Statements are but one of several references for the exercise of judgement in academic review:

“Subject benchmark statements are one of a number of external sources of information that are drawn upon for the purposes of academic review and for making judgements about threshold standards being met. Reviewers do not use subject benchmark statements as a crude checklist for these purposes however. Rather, they are used in conjunction with the relevant programme specifications, the institution’s own internal evaluation documentation, together with primary data in order to enable reviewers to come to a rounded judgement based on a broad range of evidence” (QAA, 2004).

Subject areas do not map neatly to institutional structures (e.g. departments or schools), nor to degree titles (Harris, 2009). While there are variations in the approaches of different subject groups, the broad framework for describing subject benchmarks is shown at Box 16.

Box 16. Subject Benchmark Statements	
Section	Description
Defining principles	The subject area is defined and any important dimensions such as routes into professional practice are described.
Nature and extent of the subject	This is an opportunity to describe the nature of the subject in more detail, including the boundaries of the discipline and its relationship with cognate areas.
Knowledge, understanding and skills	The core areas of knowledge expected to be covered in an honours degree in the subject are described alongside the skills that the degree should foster in its graduates (both subject-specific and generic).
Teaching, learning and assessment	A description of methods of teaching, learning and assessment that are considered to be particularly relevant to an undergraduate education in the subject area, for example the undertaking of work-based learning or practical delivery through fieldwork or laboratory sessions.
Benchmark standards	The threshold standard, which is the minimum performance expected of an honours degree graduate defined by what he or she is expected to be able to know, do or understand at the end of the programme of study—the statement may also articulate typical and excellent standards of attainment.
Bellingham, 2008.	

Subject Benchmark Statements vary in their level of detail, but share a common approach in providing descriptions of the learning outcomes expected for graduates in terms of both *coverage* and *level*. That is: the knowledge or skills to be acquired, or ‘attributes’ to be developed; and how well a graduate can be expected to demonstrate them. Coverage involves subject-specific knowledge and subject-specific skills, and generic or transferable skills. Subject Benchmark Statements depict the expected level of learning through descriptions of both *threshold standards* and *typical standards* (see Box 17).

Box 17. Subject Benchmark Statements: Standards for Biosciences: 'Generic' and 'Subject-specific', 'Threshold' and 'Typical'

Generic standard

Threshold standard

On graduating with an honours degree in biosciences, students should:

- be able to access bioscience information from a variety of sources and to communicate the principles in a manner appropriate to the programme of study

Typical standard

On graduating with an honours degree in biosciences, students should:

- be able to access and evaluate bioscience information from a variety of sources and to communicate the principles both orally and in writing (e.g. essays, laboratory reports) in a way that is well organised, topical and recognises the limits of current hypotheses

Subject-specific standard (subject area: Organisms)

Threshold standard

On graduating with an honours degree in biosciences in which the study of organisms forms a significant proportion, students should be able to:

- show knowledge of the basic genetic principles relating to, and evolution of, the organisms studied

Typical standard

On graduating with an honours degree in biosciences in which the study of organisms forms a significant proportion, students should be able to:

- describe and analyse patterns of inheritance and complex genetic interactions relating to the lives and evolution of the organisms studied

Harris, 2009.

Box 18 provides a comparison of the Subject Benchmark Statements and Tuning.

Box 18. Tuning & Subject Benchmarking compared

Tuning

Benchmarking

Definitions;

Definition;

“The Tuning Process—identifying *threshold-level learning outcomes* for a wide range of subject areas”.

“Tuning focuses not on educational systems, but on educational structures with emphasis on the subject area level, that is the content of studies. Whereas educational systems are primarily the responsibility of governments, educational structures and content are that of higher education institutions and their academic staff”.

“Tuning, in the context of quality in higher education, refers to the process in Europe of adjusting degree provision so that there are points of similarity across the European Higher Education Area.”

implementation of the Bologna Declaration process on a university level.

Subject Benchmark Statements “subject specific statements of learning outcomes form part of the national quality assurance framework.”

“Benchmark statement, in higher education, provides a reference point against which outcomes can be measured and refers to a particular specification of programme characteristics and indicative standards.”

“(Subject) benchmark statement: Represents general expectations about standards (levels of student attainment) at a given level in a particular subject area. They are reference points in a quality assurance framework rather than prescriptive statements about curricula.”

How it works;

How it works;

“Tuning has generated external reference points for Bachelor and Master programs which are described in terms of learning outcomes and competences.”

“a measurement of the effectiveness of the Tuning process is in the extent to which programs of study are described in terms of learning outcomes and competences.”

“Tuning: The term “tuning” emphasizes the notion that universities are not looking to unify or harmonize their degree programs into a prescribed set of European curricula, but rather are looking for points of convergence and common understanding based on diversity and autonomy.”

“Primary focus is at the level of Bachelor degree with honours, with some extension into Masters”.

“Subject benchmark statements provide a means for the academic community to describe the nature and characteristics of programmes in a specific subject. They also represent general expectations about the standards for the award of qualifications at a given level and articulate the attributes and capabilities that those possessing such qualifications should be able to demonstrate.”

Primarily, they are an important external source of reference for higher education institutions when new programmes are being designed and developed in a subject area. They provide general guidance for articulating the learning outcomes associated with the programme but are not a specification of a detailed curriculum in the subject. Benchmark statements provide for variety and flexibility in the design of programmes and encourage innovation within an agreed overall framework.

The statements are published by QAA, and form part of the quality assurance framework described by the Agency as the ‘academic infrastructure’ of the UK”.

<p>How it came about (Evolution of the process);</p> <p>“The original Tuning projects in Europe involved 27 countries and 9 subject areas”.</p> <p>Summer 2000 a group of universities developed a pilot project. The main aim and objective of the project is to contribute significantly to the elaboration of a framework of comparable and compatible qualifications in each of the (potential) signatory countries of the Bologna process, which should be described in terms of workload, level, learning outcomes, competences and profile.</p>	<p>How it came about (Evolution of the process);</p> <p>Benchmarking in UK began in the early to mid 1990’s.</p> <p>“In some subject areas, national statements of expected learning have been in place for a decade. Developed originally by disciplinary communities, these ‘subject benchmark statements’ are reviewed and updated in a process undertaken by “subject specialists drawn from and acting on behalf of the subject community” and overseen by QAA”.</p>
<p>Common elements;</p> <p>Basically both looking at what students need to learn.</p> <p>“The ‘Tuning’ initiative is sponsored by the European Commission. Like UK benchmarking, it seeks to identify generic and subject-specific competences for 1st cycle degrees. Phase 1 covered 9 discipline areas; Phase 2 a further 15. These reference points, which address workload as well as learning outcomes, are intended to provide support for one of the action lines of the Bologna Process.”</p> <p>Reference points are described in terms of learning outcomes and competencies and these “broadly equate to the threshold standards described under the Subject Benchmark Statements of the UK”.</p> <p>“Tuning describes thresholds of achievement for particular award level (approach is usually to focus on what distinguishes each level of award, over and above the lower award. i.e. what a Masters graduate is expected to achieve beyond the achievements of a Bachelor graduate).”</p>	<p>Common elements;</p> <p>“UK subject benchmark statements describe subject-specific knowledge and skills and generic skills at both ‘threshold’ and ‘typical’ levels of learning outcomes.</p>
<p>Differences;</p> <p>Discipline communities own the process.</p> <p>It is a “project by and for universities”.</p>	<p>Differences;</p> <p>Developed by discipline communities but then reviewed by subject specialists and overseen by QAA.</p>
<p>How has it been received by the sector?</p> <p>It is now in its 3rd phase which focuses on “implantation through the support of various international associations and networks”.</p>	<p>How has it been received by the sector?</p> <p>“Not the idea of the academic community...but engagement in development has led to a sense of ownership and ‘internalising’ of national statements within individual university contexts”.</p>

3.2.5 External examiners

Institutions' use of the academic infrastructure is evaluated through periodic institutional reviews covering all aspects of quality management. These reviews, conducted by academic peers, may lead to judgements of "confidence", "limited confidence" or "no confidence" in all or a part of an institution's provision. Another dimension of the external validation process is the use of external examiners. External examiners are used to assure academic standards across higher education awards (see Box 19).

Box 19. External Examiners in the UK

In the UK's system of higher education, institutions are responsible for the quality of the education they provide and the academic standards of the awards they offer. External examining is a long-standing system that is almost unique to UK Higher Education and is just one of the many ways in which institutions monitor whether the academic standards are appropriate. All UK universities make use of this network of independent and impartial academic advisers, drawn from other institutions or from areas of professional practice.

Examiners are typically asked to report on:

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

External examiners report to the Vice-Chancellor of the university, by referring both to their experience of standards in other universities, and to the Academic Infrastructure established by the Quality Assurance Agency for Higher Education (QAA). External examiner reports have significant status within the university. They are considered at, and used by, the department and university in internal quality assurance committees. External institutional review, conducted by the QAA, tests the effectiveness of the institution's processes for supporting and acting upon the recommendations of external examiners.

Universities UK, 2010.

The Quality Assurance Agency's Code of Practice sets out the arrangements and their relation to institutional audit and review. The QAA Code of Practice describes the role of external examiners in terms of reporting on both the expected and applied standards:

"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;

...reviews, conducted by academic peers, may lead to judgements of "confidence", "limited confidence" or "no confidence" in all or a part of an institution's provision.

- 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."

QAA (2004). *Code of Practice for the Assurance of Academic Quality and Standards in Higher Education*. Section 4: External examining.

Partly in response to the concerns raised by the House of Commons select committee, UniversitiesUK, GuildHE and the QAA, in July 2010, released a discussion paper, "Review of External Examining Arrangements in the UK" (UniversitiesUK, 2010). The discussion paper has proposed principles to inform the strengthening of external examining; a structure of minimum expectations of the role of external examiners; national criteria for appointment of external examiners and greater transparency of appointment processes; the provision of induction and training; a national template for examiner reporting; and processes for examiners to raise concerns they might have with institutional responses.

The discussion paper notes many positive aspects of the external examining arrangements:

- 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 (UniversitiesUK, 2010).

The discussion paper notes that, despite those strengths, "concerns have been raised about consistency, transparency and complexity" (UniversitiesUK, 2010). In particular, there is acknowledged variability in the roles and rigour of external examiners across fields of study and institutions, and appointment arrangements may be too cosy in some cases (UniversitiesUK, 2010). Additionally, there are new challenges associated with changes in the structure of study offerings and assessment frameworks. In particular, Bachelor degree programs in the UK have adopted a 'modular' structure, with varying choices by students over the composition and timing of electives, and a related decline in the use of 'capstone' assessment. It has been argued that the capacity for the external examination system to moderate assessment in an increasingly modularised system has been exceeded (Harris, 2009).

Various options discussed for the future of the external examination system, including:

- increasing the assessment expertise of examiners, possibly through a combination of increased support, recognition and reward;
- moving to a model where institutions explicitly partner with 'like' institutions and programs, accepting that the notion of standards is no longer 'national' in such a system;
- introduction of a "college of peers" approach, emphasising examiners' affiliations with subject areas rather than institutions; and
- shifting the focus of examiners to inputs, including the design of curricula and assessment, and the process of measuring attainment, and away from direct examination of student work (Harris, 2009).

3.2.6 Recent developments

The new Conservative-Liberal Democrats coalition government has moved early to require higher education institutions to publish ‘employability statements’—“a short summary of what universities and colleges offer to their students to support their employability and their transition into employment and beyond” (HEFCE, 2010). The statements are to cover four mandated areas: careers, work experience, curriculum support and accreditation. The new Government’s initiative is seen to be responding to employer and student concerns: “Graduate employability was highlighted as a key priority for business by the Confederation of British Industry, and for students by the National Student Forum which, in its recent report, emphasised the importance of opportunities for students to enhance their work-related skills” (HEFCE, 2010).

In November 2009, the previous Brown Labor Government established an Independent Review of Higher Education Funding and Student Finance, chaired by Lord Browne, tasked with making recommendations to Government on the future of fees policy and financial support for full and part-time undergraduate and postgraduate students. Referring to the Browne review in June 2010, the Minister of State for Universities and Science, David Willetts, asked why future students should be asked to pay more “when the current crop of students is telling us that they’re often not receiving enough direct academic feedback, and that they’re not receiving sufficient preparation to enter the job market?” (Willetts, 2010). He also noted the diversity of the contemporary British higher education student body, noting its implications for diversity of higher education provision:

“Widening participation, of course, goes hand in hand with diversity—not making every university conform to a standard model but allowing them to develop their own approaches to the various needs and ambitions of students” (Willetts, 2010).

Willetts referred to an exchange between the Vice-Chancellor of Oxford Brookes University during the hearings of the House of Commons Select Committee on Innovation, Universities, Science and Skills:

“This diversity also means that degrees do not fit into some standard model, as Janet Beer made clear in what was perhaps the most significant exchange during last year’s select committee hearings. It was a classic moment. Graham Stringer asked her: “Is a 2:1 from Oxford Brookes the equivalent of a 2:1 from Oxford University—say in the same subject, history—and how would you know?” Janet replied: “In the general run of things there is very little equivalence between Brookes and Oxford, there is not that much overlap”. And later, “It depends what you mean by equivalent. I am sorry to quibble around the word but ‘is it worth the same’ is a question that is weighted with too many social complexities. In terms of the way in which quality and standards are managed in the university I have every confidence that a 2:1 in history from Oxford Brookes is of a nationally recognised standard.” That answer is my text for today, for it gets to the heart of the dilemma: standardisation versus diversity” (Willetts, 2010).

“Widening participation, of course, goes hand in hand with diversity—not making every university conform to a standard model but allowing them to develop their own approaches to the various needs and ambitions of students.”

Willetts then went on to “float an idea that I think could transform the incentives to focus on high-quality teaching”, and suggested the separation of teaching and examining, “creating new institutions that can teach, but do so to an exam set externally”. He noted that all English and Welsh universities founded between 1849 and 1949 offered University of London external degrees, and that today the Open University provides similar ‘validation services’, and employers find them valuable:

"It has generally been assumed that any home-grown institution offering higher education must award its own degrees. But I am interested in looking at whether some institutions could benefit from linking themselves to an established exam brand with global recognition... I am keen to see new higher education institutions: the experience of other countries suggests that non-traditional higher education institutions can widen participation, reduce costs and raise standards. It could be easier to guarantee this if new HEIs also had access to the security, quality-assurance and reputation that comes with externally-examined degrees. And there could be a real competitive challenge to universities, forcing them to focus more on teaching... I also believe that this approach could improve social mobility. Success in prestigious, externally-set degrees would boost opportunities for students who cannot move away from home. Studying near one's home isn't always the best choice at the moment but if local providers opted for teaching existing highly-regarded degrees, it could improve students' employability" (Willetts, 2010).

On 12 October 2010 the Browne report was released, recommending, inter alia, wider pricing flexibility for higher education institutions, and a strengthened approach to accountability for quality. Of particular note is the recommendation to replace the Higher Education Funding Council for England (HEFCE), the Quality Assurance Agency (QAA), the Office for Fair Access (OFFA) and the Office of the Independent Adjudicator (OIA) with a new Higher Education Council. The HE Council is to have "five core responsibilities: investing in priority courses; setting and enforcing baseline quality levels; delivering improvements on the access and completion rates of students from disadvantaged backgrounds; ensuring that students get the benefits of more competition in the sector; and resolving disputes between students and institutions" (Browne, 2010).

With regard to baseline quality levels across the whole higher education sector, the Browne report argues that "the regulation of quality is central to the credibility of the higher education system":

"Students and the public will invest in higher education; they will have to be assured that investment is not being wasted on substandard provision. Maintaining minimum quality standards also protects institutions which invest in quality provision from unfair competition by providers who cut corners" (Browne, 2010).

The report also suggests a stronger approach to the setting and monitoring of minimum standards, along the lines of quality-specifications for the purchasing of courses:

"The system we propose envisages targeted investment in priority subjects. It is important that institutions do not take public money to offer these priority courses and then fail to equip students with the skills and knowledge that the investment was supposed to procure. The HE Council will therefore define minimum levels of quality for these programmes. This will mean setting basic programme content requirements e.g. minimum number of laboratory hours for applied science courses—which institutions need to meet in order for the programmes they provide to be eligible for direct public investment. Content requirements will be reviewed periodically, or in the case of student concerns over quality" (Browne, 2010).

Additionally, future funding will be conditional on higher education teaching staff being formally qualified:

"It will be a condition of receipt of income from the Student Finance Plan for the costs of learning that institutions require all new academics with teaching responsibilities to undertake a teacher training qualification accredited by the HE Academy, and that the option to gain such a qualification is made available to all staff—including researchers and postgraduate students—with teaching responsibilities" (Browne, 2010).