

Reforming quality assurance in higher education Putting students at the centre

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The purpose of this article is to offer some insights on higher education regulation from the viewpoint of a senior university administrator. I will take as my main example the form of regulation known as Teaching Quality Assurance (TQA), because it is the one of which I have the greatest and most sustained experience. At the time of writing the architecture of the regulatory system in this area is once again under discussion, and my hope is that this short note might inform those discussions.

To set this in a personal context, TQA has until recently been an important, often the dominant focus of my professional life. At York University from the mid-1980s I was closely involved as the University responded to some of the early stages of the quality assurance movement. At Lancaster University from the mid-1990s I ran a unit which offered courses and consultancy on TQA, and especially on preparing for Quality Assurance Agency (QAA) Subject Review visits. And at the LSE since 2000 my work has included mediating between the School and the QAA and leading the School's efforts to gain degree-awarding powers independent of the University of London.

This article is written from an 'old' university perspective. I have had little direct experience of the work of the Council for National Academic Awards in the 'new' universities. But it is clear that that work was impressive, and critical to establishing the credibility of the ex-polytechnics when the binary line was abolished in 1992.

For the old universities, quality assurance as a distinct area of activity began between 1984 and 1989, when the then Committee of Vice-Chancellors and Principals (CVCP) issued a series of reports on 'Universities' methods and procedures for maintaining and monitoring academic standards in the content of their courses and in the quality of their teaching'. At the time, they were called the Reynolds Reports after their main author, Professor Philip Reynolds, Vice-Chancellor of Lancaster University.¹

It is interesting to look back at the areas Reynolds chose to address in his Reports. These were:

- the external examiner system;

¹ The various sections were issued in draft form for comment by universities between 1984 and 1986; the main report itself was published July 1986 and it was followed by three reports on universities' implementation of its proposals, in July 1987, 1988 and 1989.

- external involvement in the maintenance and monitoring of academic standards – this is mainly about accreditation by professional external bodies;
- postgraduate training and research – in spite of its title, this was about research degrees;
- appeals procedures at research degree level; and
- as a last catch-all, universities’ own internal procedures – this covered scrutiny of new courses or degree programmes, or revisions to them; monitoring existing courses and degree programmes; monitoring ‘the effectiveness of teaching by members of the academic staff’; and monitoring student progression.

Re-reading the Reports, what is most striking in retrospect is their clarity and brevity. Thus the topic of external examining is dealt with in 23 paragraphs on 3 sides of an A4 sheet. The catch-all collection, even though it covers at least four discrete areas, is only 26 paragraphs long. The whole document, including a seven-side foreword and a three-side introduction, runs to 36 sides in total. The prose is uncomplicated. As an example, the first paragraph of the Foreword reads, in its entirety:

Quality and standards are words in constant use. Few stop to think what precisely they mean, and many could give no precise definition if they did (CVCP 1986: 3)

In my view, clarity and brevity were lost in what followed, and one of the aims of any new architecture should be to retrieve them.

So what reception did the Reynolds Reports receive at the time? My recollection is that, once it was recognised that this was not an attempt to impose a CNAA-type² quality assurance infrastructure on the older universities, it was largely felt to be harmless. For most of the proposals outlined in the Reports, the universities could plausibly say ‘we do this or something like it already’. The only major point of controversy was the proposal that external examiners should make annual written reports to the Vice-Chancellor. Reynolds offered no rationale for this, only a characteristically crisp account of how it was to work:

External examiners should make written annual reports as well as a written report at the end of their period of office. They should be free to make any comments they wish, including observations on teaching and course structure and content. Such observations are of particular importance in the final written report. A copy of the report made by an external examiner at the conclusion of his (sic)³ term of office might be

² Council for National Academic Awards (1965–93).

³ It is striking that the 14 members of the Academic Standards Group which produced these reports are all male.

copied to the incoming external examiner after the examinations at the end of his first year (CVCP 1986: 15, para. 22).

In view of the universities, this was going to mean that people would be unwilling to act as external examiners because of the extra work these reports would entail. This in turn would damage the university examining system as a whole. In the event these fears were not borne out; external examiner reports, produced to the outline set out in Reynolds, are now a well-established and important part of the quality assurance apparatus in all universities.

But the recommendations in the Reynolds Reports were voluntary, and the universities took the view that they could choose which of the proposals to disregard. So, for example, the third follow-up report states that six universities were not following the recommendation on external examiners reports (CVCP 1989: 4, para. 4). In all the discussions today about the future shape of teaching quality assurance arrangements, it is important to remember that the voluntary code of good practice didn't take root.

The university sector did not give careful enough thought to the implications of not treating the Reynolds Reports with high seriousness. The consequences followed quickly in the emergence in the early 1990s of the institutional level Academic Audit. This was succeeded, very shortly by subject level Quality Assessment, later re-named Subject Review. It is though possible that the government might not have regarded the Reynolds Reports as strong enough for their intended purpose even if all universities had abided by them.

In my view, the one aspect of subject level quality assessment that made a real and direct difference to teaching quality in universities came in the first few rounds of subject reviews, when the auditors undertook teaching observations without announcing beforehand whose teaching they were going to observe. These were termed 'the observation of samples of all forms of teaching' (HEFCE 1993–95), though in practice they focused mainly on lectures. They were governed by a detailed protocol (HEFCE 1993–95: 35–6). The teaching observed was graded excellent, satisfactory or unsatisfactory. Because no one knew quite how these gradings would be put to use, this meant that everybody in a department had to get engaged: to think about how they did their teaching; to review and refresh their teaching materials.

This view, or something close to it, was also shared by Sir David Watson, a major participant in and commentator on quality assurance policy over the past 25 years. In a 2006 polemic *Who killed what in the quality wars?*, he enumerated the casualties from the disputes over the shape of the UK HE quality assurance model:

A fourth casualty is the interests of our students. At one level, and at least initially, in the early days TQA did, indeed, ensure minimum standards, by driving out unacceptable practice: essays were returned, reading lists

updated, tutorial absences monitored. If you want an example, look at the report of the very first TQA judgement of ‘unsatisfactory’ (on postgraduate English at Exeter): it describes a world which no longer exists (and a good thing too). . . . The [quality assurance] war itself distracted us from improving teaching as much as we could have done (Watson 2006: 6).

The decision to drop this from the later rounds was in my view the moment where the management of quality took over from the delivery of quality. In the later stages, when the visits were scored on a scale of 1 (bottom) to 4 (top) against six aspects of provision, three were cases where departments received scores of 4 for ‘quality assurance and enhancement’ having also obtained 2 or 3 under ‘curriculum design, content and organisation’, ‘teaching, learning and assessment’ and ‘student progression and achievement’. In other words, quality assurance could be good even if teaching quality wasn’t.

This rather cerebral and indirect approach took an even stronger grip with the various recommendations on quality in the Dearing Report (1997) and the development of the Quality Assurance Agency ‘Quality Infrastructure’. This contained several different components. In roughly descending order these were:

- the Framework for Higher Education Qualifications, a typology of qualification titles designed to ensure that qualifications that share a common title are of a common level and nature;
- Subject Benchmark Statements, designed to set agreed national standards in each subject;
- Programme specifications, a proforma template intended to produce standard information on all degree programmes with a special focus on intended learning outcomes; and
- Codes of Practice ‘to promulgate good practice in relation to support of student learning and maintenance of academic standards’ – in effect, a direct successor to the Reynolds Reports.

Watson (2006: 4) termed this ‘a mind-blowingly complex and inoperable descriptive mass’. The task of implementing it, within a relatively short period of three to five years, placed a sizeable management and administrative burden on universities. In my view the approach the QAA has taken both in this period and subsequently has been over elaborate and at least some of the effort has been unnecessary.

For example, it was never clear who or what the ‘Programme Specifications’ were for. There were, and still are, circumstances in which they might conceivably have a use. But the long-standing requirement that all institutions should produce them for all programmes was always very difficult to justify, especially to academic audiences, in terms of value for education or money. This is especially so given that

they have been largely superseded by other developments, such as the Key Information Sets which are now produced for prospective undergraduate applicants.

Similarly, in the early public presentations the QAA made about the Codes of Practice, it talked in terms of 16 sections which were going to be gathered together into an over-arching code to form the backbone of institutional audits. So the initial intention, though it was never fully realised, was to cover eight more topics than Reynolds had felt it necessary to cover. Also, the topics were covered in greater depth – in its latest iteration, the Code contains a chapter on external examining that runs to 35 pages with 18 indicators. Moreover, over the period since the sections of the Code were first issued, they have been refreshed through a cycle of near constant review and revision, supported by a cycle of frequent consultation and ‘roundtable’ meetings. Given that the sections are about broad principles – eternal verities rather than time-specific details – the reviews and revisions have been too frequent.

By 2015, and from my perspective as a senior manager, the high tide of the quality assurance movement has passed. The QAA is now less of a concern to institutions than it was. Universities are learning institutions, and we have learnt how to assimilate its requirements. This should have implications for revising the quality assurance architecture, in that institutional audits, which are now the main vehicle for interaction between the QAA and institutions, now lead to diminishing returns, on both sides. By contrast:

- Meeting Home Office regulatory requirements in relation to student visas are extremely serious. The risk of losing ‘highly trusted sponsor’ status is technically remote, but were it to happen, the impact in reputational and financial terms would be immense and immediate, even catastrophic.
- Even though the Office of the Independent Adjudicator (OIA) has been in existence for over ten years, the sector has not yet got its measure. The appropriate senior managers need to pay close attention to every public pronouncement and every individual case decision it makes. In its way, also, the OIA is contributing to quality enhancement as some of the recent decisions we at the LSE have had on complaints involving disabled students have shaped our thinking in this area far more than the corresponding material in the QAA Code.
- The Office for Fair Access has set up an intelligent engagement with institutions about the issues with which it is concerned. The Access Agreement is not just a paper exercise but the basis for a conversation (although its annual monitoring return is more problematic in terms of value to the institution or the issues).
- The Higher Education Statistics Agency (HESA) still makes large demands on institutions in terms of time and resource. The HESA student return becomes more technical and complicated year on year. Also, the scale of what institutions have to do is not widely known. Even the return for a relatively straightforward institution such as the LSE involves over a million items of data (Underwood 2012).

After about 30 years of exposure to varying models of TQA, institutions may finally be reaching a stage where they can make choices about managing teaching quality assurance – what to prioritise, where to put resource. For all the QAA’s rhetoric about institutional autonomy over the years, it has never been the case that institutions have felt that it is safe to **not** do what the QAA has wanted them to do.

In re-designing the quality assurance architecture one possibility might be to go back to Reynolds. Just as the European philosophical tradition is said to consist ‘of a series of footnotes to Plato’ (Whitehead 1978: 39), most of what has followed in the TQA movement is a series of footnotes and commentaries on Reynolds. So why not return to the well-spring? But Reynolds didn’t work, and the reasons why it didn’t work are well documented and still apply. That is not an acceptable risk for anybody. But it is important that all the parties involved – government, its agencies, the sector, the individual institutions – should review all that has accreted along the way. They should ask themselves what can be made optional for institutions, especially those that have been through significant numbers of institutional audits; what can be streamlined; and, above all, what can be removed. These are proper management questions for any systems review, and the subject matter of TQA doesn’t put it above them.

This leads on to an even more fundamental question: who are we trying to assure about what? My own hypothesis is that the major concerns of the public which still pays for most of what higher education does are to do with ‘mickey mouse degrees’, contact hours and grade inflation. For students the main concern is over the quality of feedback on formative and summative, which may be code for a cry for personal attention in ever expanding institutions. Students are not interested in the bureaucracy of risk and regulation. As an example of this, at the time I started preparing this paper, a group of students was in occupation of one of the LSE’s main committee rooms. In keeping with the traditions attaching to occupations they had presented the School with a list of demands. These included:

an end to the audit culture which makes academic output an object of assessment and measurement, which stifles free thinking and impoverishes innovation and student-staff relations (Occupy LSE: 2015).

The next Teaching Quality Assurance regime needs, in my view, to focus more intensely on practical matters around ‘the student delivery’, especially ‘front end’ teaching quality and institutional support for student learning – the areas of professional practice outlined in the earlier quotation from Sir David Watson. All of those involved in this area should do more to put students at the centre of teaching quality assurance.

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