**DEGREE CLASSIFICATION**

**TRANSPARENT, CONSISTENT AND FAIR ACADEMIC STANDARDS**

**QSN RESPONSE TO CONSULTATION DOCUMENTMENT (Draft)**

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

*IN PART*

**Please explain your response.**

*It is essential that there full confidence in the value of degrees across the sector and the public. There are challenges identified in the report to ensuring that ongoing and continued confidence and to this end we would support the development of a statement about classification, quality and standards. But we would like to see a bolder statement, owned by the sector, which affirms the value of higher education qualifications and sets out the basis for confidence in these awards now, but which indicates (as in the proposal) actions which will further strengthen the classification system.*

*We suggest that the statement be given an alternative title. ‘Statement of intent’ sounds tentative and provisional, and fails to foreground the positive value and high quality of degree qualifications as they now are.*

*It is not immediately clear who the stakeholders and audience for the statement are intended to be.*

*It is also unclear to what extent ‘established shared principles for algorithm practice’ would be expected to be adopted given the expressed intention to protect institutions’ individual learning criteria and outcomes.*

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

*A high level statement could set out the principles of degree classification and quality assurance—going beyond the Quality Code and making clear that principled innovation is to be encouraged. While we may use them in different combinations, the elements of degree classification (such as weighting of parts, overall average, exit velocity (performance at the end point), and preponderant performance (i.e. median or modal approaches) are fairly common across the sector, and the sector could provide a high level statement setting out why these criteria are used. Such a statement would acknowledge disciplinary differences in how classification is approached, for example for art, medicine, performing arts, and provide assurance that diversity is valid and healthy. A statement which provides a clear and accessible account of the rationale for the components of classification would provide a single point of reference to students, prospective students and members of the public who have an interest in the matter.*

***This would be more helpful than directing public attention to individual institutions’ statements which, in their volume and diversity, may be overwhelming, confusing, and impede rather than promote public understanding.*** *It would provide some reference points for understanding this material, which is often technical, complex and subtle.*

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

*It seems reasonable that a provider review their practices within one year of the point at which the expectations are clear.*

*But there needs to be cross-sector work, prior to review at each institution, to articulate shared assumptions and ensure a reasonable consistency of language. There is a concern that, without articulation of a broad consensus, the array of diverse institutional publications remains confusing and inaccessible.*

*If there are changes to be enacted these may take between one and three years (e.g. degree algorithm changes) depending on the type of change (and in context of consumer law).*

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

*The statement’s adoption in England would be covered by compliance with OfS Conditions of Registration B1, 3, 4 & 5 and the related Standards Expectations of the revised UK Quality Code.*

*The statement(s) could be a reference point (similar to benchmarks) that links to the Quality Code, for all four nations.*

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

*IN PART*

**Please explain your response**

*The statement provides a useful framework through which to describe and evaluate planned and deliberate actions taken at provider level to increase student attainment and to secure academic standards. These may extend beyond assessment practice to cover enhancements to curriculum design, learning and teaching, academic support, and related staff development.*

*We would suggest that ‘Classification Algorithm’ is not a particularly accessible term, and that it be amended to ‘classification method’.*

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

*NO*

**a. If yes, please explain your response**

**b. If no, please set out any other mechanisms for enhancing external assurance**

*The role of a Chief external advisor would require resourcing and support at institutional or national agency level to achieve their role. This would run counter to the current aim of reducing costs, burden and layers and relying on institutional processes and activities to secure standards.*

*The sector already uses external examiners and external advisors in well understood (within the sector) advisor positions.*

*This could and should be better communicated to increase/enable public confidence about the existing use of independent judgement.*

*In addition, the role of External Examiners could be strengthened and better communicated and there could be opportunities for establishing professional development and training for external advisors.*

**7. What are the:**

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

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

*While reasonable in themselves, these commitments mostly replicate what HEIs already do in discharging their responsibilities for academic governance. But essentially*

1. *the proposals are sound, including the AdvanceHE work on the development of external examining and calibration of standards.*
2. *Recruitment of External Examiners can be difficult and may be exacerbated by increasing the demands of the role.*

**8. What are the:**

**Opportunities associated with enhancing components of the UKPSF relating to external examiners**

**Challenges associated with enhancing components of the UKPSF relating to external examiners**

1. *The support being developed by Advance HE is welcomed as an important resource in establishing professional development and the opportunity to further enhance the Framework. This is an opportunity to reinforce the remit and expectations of external examiners and their capacity to challenge or escalate anomalous practices.*
2. *There is a potential separation of an ‘elite’ body of examiners, as opposed to the current rich and diverse body of examiners that is drawn from academics, employers and practitioners.*

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

*Algorithm practices represent an area of greater risk to the potential inflation of grades, particularly around the design and development of algorithms and the understanding of the impact this may have and should be articulated in such a way that this impact is comparable across this sector.*

*But we would suggest that there is wider sector consultation on rules. Some of the commentary on elements of degree algorithms seem questionable, and predicated on an unexamined assumption that the arithmetical mean is the key to valid classification. This leads to proposals that institutions be required to justify the use of other measures in classification, such as mode or median, as if they are somehow suspect. Similarly, there is the suggestion that a zone of consideration needs to be justified because it deviates from classification by the mean.*

*A barrier to implementing the proposals may therefore be that they are poorly justified and may not command the assent of the sector as a whole.*

**10. Should the statement of intent contain a providers' explanations of:**

1. **weightings of marks**

YES

1. **'zones of consideration'**

YES

1. **'discounting' low performing modules**

YES/NO

1. **PSRB influences on algorithm design**

YES/NO

a. Please explain your responses

*Providers should explain their degree classification and rather than identify specific elements which require justification (why these features and not others such as using a mean mark) institutions should be asked simply to explain the basis and rationale for their algorithm, and any interventions (informed by academic judgement) that might be applied to degree outcomes.*

*But multiple provider explanations would be overwhelming, and this comes back to the point about needing more work to achieve and secure shared understanding so that it can be communicated effectively, and in a comparable way.*

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

 *YES*

**a. Please explain your response**

*In principle, something of this sort seems reasonable, although there are already reference points such as FHEQ, subject benchmarks in use so it becomes another point to map and connect to, furthermore it may be difficult to find language which is meaningful and there are concerns about disciplinary differences.*

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

*We would query the adoption of separate generic descriptors for Professional competencies which may normally be reflected within subject-specific Practical skills.*

*The language used needs a comprehensive review. Terms such as ‘strong’ are susceptible to such a latitude of interpretation that they have little explanatory value. And point two of 2:2 and 3rd class degrees is unwieldy and does not adequately differentiate between the classifications.*

*Achievement at a particular level will be a combination of attributes and outcomes.*

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

YES/NO

*There is no need for this to be regulation. This could be a reference point within the UK Quality Code.*

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

 **institutional practice?**

*HE providers already utilise the FHEQ generic level descriptors, QAA subject benchmark statements and qualification characteristics statements within Institutional processes for programme development, approval and review and the proposed classification description could easily be added there.*

**other relevant documents or frameworks?**

*(a) It would provide the basis for University-level classification criteria and their local interpretation in Schools, and therefore feed into marking criteria. It should be particularly useful for institutions seeking degree-awarding powers.*

**15. What are the:**

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

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

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

*Whilst acknowledging that metrics can prompt reflection, we are cautious about the development of a shared sector metric for degree outcomes. Unlike other benchmarks (non continuation, NSS etc), a degree outcomes benchmark could become a misunderstood proxy for academic standards; where both an increase or decrease in degree outcomes could potentially undermine public perception of academic standards at an institutional and sector level.*

*We would strongly emphasise the risks in identifying grade inflation though a metric but which fails to recognise the possibility of added value and the power of education to transform lives, raise ambitions, and enable students with low prior attainment and social disadvantage to excel academically. These metrics can evidence successful widening participation measures (rather than grade inflation). It would be helpful to have a balancing narrative in the guidance around added value.*

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

*The metric would have to be meaningful to those outside of the sector to be of value.*

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

*Advance HE work on External Examiner development and calibration supports this ambition.*

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

*YES*

**a. Please explain your response**

*In principle, yes, since the inclusion of classification in league tables may incentivise grade inflation. In practice, it is difficult to see how this should be accomplished since the league table compilers are free agents. Students are legitimately interested in this metric, but it can’t be removed needs to be explained.*

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

*Any changes should take into account the public’s, employers, PSRBs, familiarity with, and respect for, the established degree classification system and seek to enhance its robustness rather than replacing it with any less familiar and easily understood system.*

**20. This part of the survey uses a table of questions, view as separate questions instead?**

**21. Which of the following options for reforming or enhancing the degree classification system should be considered in more detail?**

1. **Introduction of new upper award - for example a starred first**

*NO*

1. **Introduction of a 'cohort ranking' - for example. providing additional information on graduates' position in the grade distribution**

*NO*

1. **Resetting the classification boundaries e.g. moving up by ten marks so 80 = 1st and so on.**

*NO*

1. **More regular reviews of Subject Benchmark Statements to keep pace with improvements in teaching and learning**

*YES*

1. **Universal HEAR format**

*NO*

1. ***Other***

*YES*

1. **No reform required**

*NO*

**a. If other, please explain your response**

*We would support further developments in the identification and meaningful measurement of ‘Learning Gain’.*

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