



Consultation on changes to the Academic Infrastructure

December 2010

Supporting document

Introduction

The **Academic Infrastructure** is a set of UK-wide, nationally-agreed reference points that give all higher education providers a shared framework for setting, describing and assuring the quality of the learning experience and standards of higher education awards and programmes.

During 2009-10, QAA evaluated the Academic Infrastructure. Overall, the results of the evaluation showed that it has served the higher education sector well, with much evidence of the positive impact it has had on assuring the standards and quality of higher education provision in the UK. However, the evaluation also identified areas where further improvement would be welcome.

In response to the findings of the evaluation, QAA proposes to restructure the components of the Academic Infrastructure into a **UK Code of Practice for standards, quality and enhancement in higher education**. The Code of Practice will have two parts, one dealing with academic standards and one with academic quality and enhancement. Each part will contain several chapters, each of which will be available separately to download from QAA's website. This new Code of Practice will form the definitive reference point for all those involved in delivering higher education which leads to an award from or is validated by a UK higher education provider. It will cover all students, whatever their mode or location of study, and both undergraduate and postgraduate.

The detail of the proposed changes is set out in a consultation document which is available at www.qaa.ac.uk/news/consultation/AI/. Responses to the consultation should be with QAA by 1 March 2011. Responses may be submitted electronically through QAA's website or by email to academicinfrastructure@qaa.ac.uk. Details of four round table events being held to support the consultation are available from www.qaa.ac.uk/events.

This supporting document sets out the evidence on which the proposed changes to the Academic Infrastructure are based. It describes in detail how the findings of the evaluation have been addressed.

The evaluation of the Academic Infrastructure

The approach taken in the evaluation was primarily one of consolidating, collating and analysing existing information, derived from a range of activities undertaken by QAA and other bodies. Advised by a sounding board of representatives from higher education providers and higher education representative bodies, this information was used to inform

the writing of a discussion paper.¹ In spring 2010 the discussion paper was circulated to individuals, higher education providers, organisations and public bodies with an interest in higher education, and to students through their representative bodies. In response, 118 replies were received, from higher education institutions in all parts of the UK, further education colleges, professional, statutory and regulatory bodies, UK representative bodies and individuals.²

During the period in which the discussion paper was available for comment, four round table discussion events were held across the UK, at which over 200 delegates considered questions relating to the Academic Infrastructure. Feedback was collected from the round table discussion events and is available on the QAA website.³ QAA officers also held discussions with a number of groups and networks representing different interests within the higher education sector.

The evidence from all these sources informed the final report of the evaluation of the Academic Infrastructure, which can be found at www.qaa.ac.uk/academicinfrastructure/evaluation10findings. The final report made six proposals for how the Academic Infrastructure needed to change in order to remain fit for purpose as a framework for UK higher education providers in setting and maintaining academic standards and assuring and enhancing the quality of the learning opportunities they provide.

Developing the changes to the Academic Infrastructure

This supporting document considers in detail how the proposals made in the final report of the evaluation are being addressed by the changes to the Academic Infrastructure set out in the consultation document.⁴ It provides examples of the evidence which has informed how the proposed Code of Practice for standards, quality and enhancement in higher education has been developed.

Proposal 1: QAA should state clearly what it understands by 'academic threshold standards' and 'academic quality'.

This will be addressed by establishing definitions to be used to underpin the structure and content of the UK Code of Practice for standards, quality and enhancement in higher education. The definitions proposed for use for the purposes of the new Code of Practice are not allied to any particular external review method operated by QAA, but they do not contradict any definitions currently in use or those proposed for the new Institutional review method for England and Northern Ireland.⁵

The definitions that will be used are:

- **Threshold academic standards** are the level of achievement that a student has to reach to gain an academic award. For similar awards, the threshold level of achievement should be the same across the UK.
- **Academic quality** is a way of describing how well the learning opportunities available to students are managed to help them to achieve their award. It is about

¹ Academic Infrastructure discussion paper: www.qaa.ac.uk/academicinfrastructure/evaluation10.

² Analysis of written responses to the discussion paper: www.qaa.ac.uk/academicinfrastructure/evaluation10findings.

³ Round table materials: www.qaa.ac.uk/events/AssuringQandSinHE.

⁴ Academic Infrastructure consultation document: <http://www.qaa.ac.uk/news/consultation/AI/>.

⁵ For more information, see www.qaa.ac.uk/reviews and www.qaa.ac.uk/news/consultation/reviewconsultation.asp.

making sure that appropriate and effective teaching, support, assessment and learning opportunities are provided for them.

Background evidence

Why do we need definitions?

The terms 'standards' and 'quality' have been used in connection with higher education for some time. However, they are used to mean many different things within higher education, let alone the many ways in which the terms are used in general everyday language. The evaluation of the Academic Infrastructure and other reviews have found that there is not always a good understanding of the meaning of the terms as used by QAA or of the difference between them.⁶

The definitions of 'standards' and 'quality' used by QAA have their roots in the work of one of QAA's predecessor organisations, the Higher Education Quality Council (HEQC). HEQC was invited by the then Secretary of State for Education to work with the higher education sector to consider the 'broad comparability of standards' and threshold standards for first degrees. This work was carried out through the Graduate Standards Programme, which reported in 1997.⁷

At the same time, the National Committee of Inquiry into Higher Education, under the chairmanship of Sir Ron Dearing (and Sir Ron Garrick in Scotland) was carrying out its review of how UK higher education was meeting the challenges posed by its rapid expansion in the 1990s.⁸ The recommendations of the Dearing and Garrick reports relating to quality and standards formed the basis from which the Academic Infrastructure was developed, also drawing on the work of the Graduate Standards Programme.

The Academic Infrastructure is described as containing four components, 'three are mainly concerned with setting standards and one (the *Code of practice*) is concerned with the management of quality'.⁹ However, the development of definitions of the terms has been more closely linked to audit and review activities, where two of the main themes of investigation are an institution's management of academic standards and management of learning opportunities.¹⁰ The evaluation identified that the lack of a clear understanding of the terms 'standards' and 'quality' in relation to the Academic Infrastructure needed to be addressed.

⁶ *Evaluation of the Academic Infrastructure: final report* (August 2010), paragraph 3.4. See also *Thematic enquiries into concerns about academic quality and standards in higher education in England: Final report* (April 2009) (www.qaa.ac.uk/standardsandquality/thematicenquiries/FinalReportApril09.pdf) and *Report of the sub-committee for Teaching, Quality and the Student Experience* (October 2009) (www.hefce.ac.uk/pubs/hefce/2009/09_40/09_40.pdf).

⁷ www.qaa.ac.uk/search/publications/archive/DQE241_GraduateStandardsProgrammeFinalVol1.asp#sec4.

⁸ For further details, see *Evaluation of the Academic Infrastructure: a QAA discussion paper* (February 2010), paragraph 1.2.

⁹ www.qaa.ac.uk/aboutus/AI.asp.

¹⁰ As an example, the *Enhancement-led institutional review handbook* (second edition, 2008) states that 'the overarching theme of ELIR continues to be the strategic management of academic standards and the enhancement of the quality of the student learning experience' (paragraph 10). Details of the review and audit activities conducted by QAA, including explanations of the definitions of 'standards' and 'quality' used, are available from www.qaa.ac.uk/reviews.

Why do we talk about 'threshold' academic standards?

'Academic standards' in a general sense refers to the levels set for achievement or attainment of awards or qualifications in higher education, at different grades. Individual higher education providers are responsible for setting the grades, marks or classification which a student can be awarded in achieving an individual award. The threshold standard is the minimum level of achievement required nationally to be awarded a particular qualification, such as a bachelor's or master's degree. Threshold standards are distinct from the standards of performance that a student would need to achieve to gain a particular class or grade of award.

Threshold academic standards, as minimum levels of achievement for particular awards or qualifications, are set out in the Academic Infrastructure, in particular in the frameworks for higher education qualifications and subject benchmark statements.¹¹ It has been acknowledged that the degree classification system, which is used to 'grade' bachelor's degrees, may no longer be fit for purpose in a mass higher education system. It is intended that the development of the Higher Education Achievement Report (HEAR), by providing more detailed information about a student's programme of study, will ultimately remove the need for classifications.¹²

What is 'academic quality'?

In order to achieve a higher education award, students participate in the learning opportunities made available to them by their higher education provider. How the higher education provider manages those learning opportunities to ensure the student is able to participate and meet the learning outcomes is captured in the term 'academic quality'.

The explanation given in the operational description for a new institutional review method for England and Northern Ireland summarises what is meant by 'learning opportunities': 'Learning opportunities are what an institution provides in order to enable a student to achieve what is required to qualify for an award. Learning opportunities include the teaching students receive in their courses or programmes of study, and the contribution students make to their own learning, as well as the academic and personal support they receive which enable them to progress through their courses. Learning resources like IT or libraries, admissions policies, student support, and staff development for the teaching role all contribute to the quality of learning opportunities, just as much as the make-up of the actual course or programme. We use the term "learning opportunities" rather than "learning experience" because while we consider that an institution should be capable of guaranteeing the quality of the opportunities it provides, it cannot guarantee how any particular student will experience those opportunities'.¹³

In Enhancement-led institutional review (ELIR) in Scotland, the focus is on the enhancement of the quality of those aspects of the student learning experience for which the institution bears a direct responsibility. This is noted as having two dimensions: 'In relation to the curricula, enhancement refers to the processes used to sustain and develop the currency of the curricula and its outcomes in the light of developments in knowledge and understanding, professional practice, employer and other stakeholder expectations and other appropriate

¹¹ Most subject benchmark statements also describe 'typical' performance, the levels of achievement attained by most students.

¹² See *Beyond the honours degree classification: the Burgess Group final report* (2007).

(www.universitiesuk.ac.uk/Publications/Pages/Publication-272.aspx). Further information on the HEAR is available from www.heacademy.ac.uk and www.recordingachievement.org.

¹³ www.qaa.ac.uk/news/consultation/OD_Full2010.pdf.

reference points....In relation to promoting and supporting effective student engagement with their learning, enhancement embraces all the structures and processes used by an institution to support effective student learning in all the contexts in which learning takes place'.¹⁴

Proposal 2: QAA should clearly set out which components of the Academic Infrastructure are essential requirements for higher education providers when they are setting and maintaining the academic standards for which they are responsible.

This will be addressed through the development of the **UK Code of Practice for standards, quality and enhancement in higher education, Part A: Setting and maintaining threshold academic standards.**

Part A will make clear what the requirements for higher education providers are:

- for those with degree awarding powers, to be able to demonstrate how they have set and are maintaining academic standards at appropriate levels
- for those without degree awarding powers, to be able to demonstrate how they contribute to maintaining the academic standards of their awarding body
- and for all higher education providers to be able to describe the academic standards.¹⁵

It will suggest ways in which the setting and maintaining of academic standards can be assured.¹⁶

The structure of Part A of the Code of Practice will point to existing reference points such as the frameworks for higher education qualifications, and the integrated credit and qualifications frameworks for Wales and Scotland, the Credit and Qualifications Framework for Wales (CQFW) and the Scottish Credit and Qualifications Framework (SCQF).¹⁷ The qualifications frameworks will not be deconstructed to be included as part of the Code of Practice, but will continue to exist as separate entities. Both higher education qualification frameworks have been self-certified as compatible with the Framework for Higher Education Qualifications in the European Higher Education Area (FHEQ-EHEA) as part of the Bologna Process and it is thus important that they remain as self standing reference points.¹⁸

The new Code of Practice will also navigate the reader to other reference points beyond those specifically for higher education qualifications, such as the Qualifications and Credit Framework for the vocational education and training sector in England.¹⁹ It will clearly indicate the relationship between the different frameworks.

¹⁴ *Handbook for enhancement-led institutional review: Scotland* (second edition) (2008), paragraphs 33-34 (www.qaa.ac.uk/reviews/ELIR/handbook08final/ELIRHandbook2008.pdf).

¹⁵ For further explanation of degree awarding powers, see www.qaa.ac.uk/reviews/dap.

¹⁶ 'The legal power of a higher education institution in the UK to grant awards and qualifications carries with it a responsibility to ensure that the academic standards of all its awards and qualifications are consciously and carefully secured' (*Code of practice for the assurance of academic quality and standards in higher education, Section 2: Collaborative provision and flexible and distributed learning (including e-learning)*, Precept A1 explanation).

¹⁷ For further information see *Evaluation of the Academic Infrastructure: a QAA discussion paper* (February 2010), section 4.1.

¹⁸ The report verifying the compatibility of the FHEQ with the FHEQ-EHEA is available at www.qaa.ac.uk/academicinfrastructure/FHEQ/selfcertification09.

The report verifying the compatibility of the Scottish higher education qualifications framework is available at www.qaa.ac.uk/academicinfrastructure/FHEQ/SCQF/SelfCertification2007.asp.

¹⁹ www.qcda.gov.uk/qcf.

It will also consider some of the underlying principles for the setting and maintenance of academic standards, around the topics of assessment and externality.

Background evidence

Qualification descriptors

Qualification descriptors describe the typical higher education qualification at each level of the framework, as illustration; within each level, there could be a number of qualifications which involve different volumes of learning and hence a different range of outcomes, but the qualification descriptor remains the reference point for any award at that level. For example the qualification descriptors contained in the FHEQ 'exemplify the outcomes and attributes expected of learning that results in the award of higher education qualifications'; they are 'a statement of outcomes, achievement of which is assessed and which a student should be able to demonstrate for the award of the qualification'.²⁰

The following statement from the *Handbook for enhancement-led institutional review* explains how the qualifications frameworks are used by higher education providers and how that use is monitored through external review: '...institutions will maintain the academic standards of their awards through their processes for defining awards, validating and reviewing programmes, and assessing learning outcomes achieved. The ELIR process will engage with the effectiveness of these institutional processes for maintaining the academic standards of awards, taking account of appropriate reference points.'²¹

However, in response to the discussion papers published during the evaluation of the Academic Infrastructure, 'some respondents expressed concern about the number of different types of frameworks in currency in the higher education sector including the difficulties between alignment with the Qualifications and Credit Framework (QCF) for the vocational education and training sector and between regional qualification frameworks (FHEQ EWNI and SCQF). Clearer information about how the higher education frameworks for qualifications related to other qualifications frameworks was suggested with at least seven references to the possibility of a link from the FHEQ EWNI to the QCF.'²²

Responses to the discussion paper also included 'at least 30 responses [in which] some mention was made about integrating, merging or consolidating into one document the FHEQ EWNI with the higher education credit framework for England. One higher education provider in Wales reported that the revision of the FHEQ EWNI in 2008 to incorporate numbering of qualification levels worked well with the CQFW. They suggested, reflecting on their own experience, that higher education providers in England would find it useful to have a credit framework in the same document as the FHEQ EWNI. There appeared to be some level of support among other respondents for this approach, although a few respondents noted that it needed to remain clear that the adoption of credit by a higher education provider was not a requirement. Respondents indicated that there are some providers that either do not use credit or if they do, use a framework such as European Credit Transfer System (ECTS)'.²³ While a survey carried out in summer 2009 showed that the large majority of higher education institutions in England were using credit, the integration of credit and

²⁰ *Framework for higher education qualifications in England, Wales and Northern Ireland* (2008), paragraphs 3 and 28 (www.qaa.ac.uk/academicinfrastructure/FHEQ/EWNI08/default.asp).

²¹ www.qaa.ac.uk/reviews/ELIR/handbook08final/default.asp, paragraph 36.

²² *Evaluation of the Academic Infrastructure: analysis of the written responses to the discussion paper* (August 2010), paragraph 3.6 (hereafter *Analysis of the written responses*).

²³ *Analysis of the written responses*, paragraph 3.9.

qualifications frameworks is not a straightforward task.²⁴ It is proposed that this topic is explored further in a subsequent programme of work by QAA, and may be incorporated in the Code of Practice at a later date.

Benchmark statements

Subject benchmark statements 'represent general expectations about standards for the award of qualifications at a given level in terms of the attributes and capabilities that those possessing qualifications should have demonstrated... 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'.²⁵

Where a relevant subject benchmark statement is not available in relation to an award (with regard to either subject or level coverage), or more than one subject benchmark statement could apply, 'the generic outcomes contained in the qualification descriptors provide a particularly important point of reference'.²⁶ To date, QAA has produced one qualification benchmark statement for Foundation Degrees; 'it describes the qualification in terms of its particular purpose, general characteristics and generic outcomes, but it does not include subject-level detail'.²⁷

In response to the discussion paper, 'respondents reported that the commonest use of subject benchmark statements was in programme design and development (particularly in identifying appropriate intended learning outcomes); at programme approval (where they may be referenced in programme specifications); in annual monitoring and periodic review; and by external examiners. Used in this way, subject benchmark statements were seen to contribute to the institution's setting of academic standards (although it was noted by numerous respondents that any requirements set by professional bodies would take precedence over the benchmark statement)'.²⁸

Among the respondents to the discussion paper, 'the commonest suggestion for the future development of subject benchmark statements was their extension to other qualification levels (Foundation degree and master's) and to a wider coverage of subject areas. One suggestion was that for each subject area, a single statement could cover qualifications from Foundation degree to master's level, which would help to clarify progression opportunities.... An alternative might be to provide more generic guidance of attributes at different qualification levels, with respondents identifying the master's characteristics document as a useful example. This could sit alongside explanatory guidance about how the existing statements could be applied at (FHEQ EWNI) levels 5 and 7'.²⁹

Programme specifications

Higher education providers use programme specifications to 'define the specific outcomes of learning for a qualification in a particular subject area offered by that institution'.³⁰ In response to the discussion papers, 'over half of the respondents who answered the question about programme specifications directly considered that they had not met their

²⁴ For further details, see www.qaa.ac.uk/standardsandquality/credit/creditSurveyDec09.pdf and the consultation document at www.qaa.ac.uk/news/consultation/AI/.

²⁵ Preface to revised subject benchmark statements (2007-10) (see www.qaa.ac.uk/academicinfrastructure/benchmark/default.asp).

²⁶ FHEQ (2008), paragraph 53.

²⁷ Foundation Degree qualification benchmark (2010), paragraph 3 (www.qaa.ac.uk/reviews/foundationDegree/benchmark/FDQB.pdf).

²⁸ *Analysis of the written responses*, paragraph 4.5.

²⁹ *Analysis of the written responses*, paragraph 4.8.

³⁰ FHEQ (2008), paragraph 54.

original aims, expectations and anticipated benefits, although half of those respondents suggested that they had been useful in some other way, usually as a tool for internal quality assurance. Of the almost one-fifth of respondents who suggested that programme specifications had met their original aims, over two-thirds qualified this in some way, again noting that the remit of providing information for students has not been achieved. However, recognising the value of programme specifications as a quality assurance tool, two thirds of respondents stated that they were effective in setting and maintaining standards, although several respondents noted that this had not been their original intention'.³¹

Moreover, 'almost three-quarters of respondents suggested that the value of programme specifications was in their role as a quality assurance tool, rather than as means by which information could be provided to students. Around one-fifth of respondents answering the question suggested that they could fulfil this latter function to some extent, but very few respondents thought they could fulfil both purposes adequately. ...Many respondents noted that information for students, both current and prospective, was available, in a more accessible form, in other sources, including prospectuses, programme handbooks and departmental website, although in some cases it was acknowledged that the programme specification could be the source for such information'.³²

Assessment and externality

Higher education providers use suitable mechanisms of assessment to assure themselves that a student awarded a qualification has achieved the learning outcomes set for the award: 'as bodies responsible for the academic standards of awards made in their name, institutions have effective procedures for...implementing rigorous assessment policies and practices that ensure the standard for each award and award element is set and maintained at the appropriate level, and that student performance is properly judged against this'.³³

A key mechanism in the way in which this is maintained is external examining: 'external examining provides one of the principal means for maintaining nationally comparable standards within autonomous higher education institutions, the external examiner being one of a number of independent and impartial advisers used by them...External examining is therefore an integral and essential part of institutional quality assurance. It is the responsibility of each institution to establish criteria and guidance for external examining that enable its academic standards to be described and maintained'.³⁴

The importance of external involvement in the setting and maintenance of academic standards is highlighted in the *Handbook for Institutional audit*: 'There are two areas where audit teams will find it particularly difficult to express confidence if certain elements are found to be missing. The first of these is a strong and scrupulous use of independent external examiners in summative assessment procedures. The second is a similar use of independent external participants in internal quality management procedures...In both cases, the emphasis is on both independence and externality being satisfied'.³⁵

In terms of providing assurance to a wider public that the standards of higher education awards are maintained, the role of external examiners is key, as noted in the context of the sector-led review of external examining: 'it is plainly the responsibility of the sector itself to address these public concerns, by articulating and communicating the role of external examining and providing evidence about its operation in practice more effectively. Codifying

³¹ *Analysis of the written responses*, paragraph 5.2.

³² *Analysis of the written responses*, paragraph 5.5.

³³ *Code of practice, Section 6: Assessment of students*, precept 1.

³⁴ *Code of practice, Section 4: External examining*, paragraphs 12-13.

³⁵ *Handbook for institutional audit: England and Northern Ireland (2009)*, paragraph 19

(www.qaa.ac.uk/reviews/institutionalAudit/handbook2009/InstitutionalAuditHandbook2009.pdf).

these responsibilities more clearly in a set of national expectations, rather than guidelines, backed by common core templates and criteria would enable the sector to describe external examining more clearly and reassure other interested parties more effectively without constraining the flexibility needed to satisfy the needs of different subjects or compromising institutional autonomy'.³⁶ The new Code of Practice will provide opportunity to address this, depending on the findings of the review.

Proposal 3: QAA should clarify the essential requirements on higher education providers in managing the quality of learning opportunities made available to students.

This will be addressed through the development of the UK **Code of Practice for standards, quality and enhancement, Part B: Assuring and enhancing academic quality**. Part B of the Code of Practice will focus on the learning opportunities higher education providers make available to students, how they ensure they are of appropriate quality and how they can be managed and enhanced.

The format currently used in the *Code of practice* of principles, encapsulating key issues, supported with explanation about why they are considered important and examples of how they might be addressed will be retained. The existing *Code of practice* provides much of the content for the new document, although some areas will be reorganised and some chapters will address topics not presently covered.

Part B of the new Code of Practice will be made up of a series of chapters, each of which deals with a different stage of the 'student journey'. The use of the 'student journey' as an organising principle was derived from suggestions made by respondents to the evaluation discussion papers, and through discussions with the sector representative Academic Infrastructure Sounding Board. The consultation document sets out one possible structure, but there are others, such as linking assessment to teaching and learning and dealing with the quality assurance and quality enhancement dimensions of 'externality' separately. The consultation document invites respondents to suggest alternative structures if they would be more helpful.

In every chapter, certain overarching themes must be considered:

- how information about the topic is communicated to students and other relevant audiences
- how the topic relates to the needs of non-traditional learners (eg work-based learners, part time students)
- that equality and diversity issues have been embedded throughout.

Each chapter will also consider the role of enhancement in relation to its topic, pointing to useful sources of good practice, such as QAA's Enhancement themes and *Outcomes* publications and work by the Higher Education Academy.³⁷

³⁶ *Review of External Examining Arrangements in the UK: A discussion paper from Universities UK, Guild HE and the Quality Assurance Agency for Higher Education* (July 2010), paragraph 21 (www.universitiesuk.ac.uk/PolicyAndResearch/PolicyAreas/QualityAssurance/HowTheSystemWorks/Documents/ExternalExaminersDiscussionPaper.pdf).

³⁷ See www.qaa.ac.uk/outcomes and www.qaa.ac.uk/scotland/qualityframework/enhancementthemes.asp.

Background evidence

The existing '*Code of practice* is a statement of good practice that has been endorsed by the higher education community'.³⁸ In responding to the discussion papers, 'some respondents expressed the view that the *Code of practice* was one of the most successful components of the Academic Infrastructure and had been helpful in making a great impact on the development of quality assurance within higher education. There were over 20 responses about how the *Code of practice* encouraged higher education providers to reflect on their own practice and to benchmark themselves against recognised good practice, and that it encouraged consistency in practice in various areas. It was also noted that student representative bodies had made use of individual sections of the *Code of practice* as catalysts for enhancement in their own institutions'.³⁹

The new Code of Practice is intended to be the definitive reference point for higher education providers, as the status of the existing *Code of practice* was one of the most common points raised by respondents to the discussion paper: 'some respondents requested clearer endorsement of the position that all sections are intended to be advisory in nature. Other respondents sought clarity about what was perceived to be in reality a distinction between sections which were considered to require compliance and those which provided guidance. The uncertainty created by differing interpretations by QAA audit and review teams was not considered helpful. Two respondents explicitly suggested that the sections of the *Code of practice* should be reformatted so that precepts were organised into those which were "essential" and those which were "desirable", or as "must", "should" and "could".'⁴⁰

A number of respondents suggested alternative structures for a Code of Practice, including:

- that *Section 6: Assessment of students* could usefully be merged with *Section 4: External examining*.
- that teaching and learning methods or learning support resources could form additional sections or could be themes which were embedded across all sections.
- that the voices of some stakeholders were missing from the existing *Code of practice*. For example, there could be an additional section on the involvement of students in quality assurance.

Other related suggestions included a proposal for a section on the student experience, covering student support and entitlements. It was also noted that more could be done to ensure that the diversity of the student population was reflected in the *Code of practice*, particularly the perspective of postgraduate students (especially taught postgraduates) and that equalities issues should be embedded in all sections.⁴¹

Respondents to the discussion papers also 'suggested that a section of the *Code of practice* which focused on public information could be a useful addition, particularly in light of the current review of this area. It was also noted that enhancement is not currently explicitly focused on in the *Code of practice*. This was identified by one respondent as a major short-coming. While the enhancement agenda is more prominent in Scotland than the rest of the UK, the general principles that would be encapsulated in a section on enhancement would be beneficial to the sector as a whole'.⁴²

³⁸ Foreword to revised sections of the *Code of practice*, paragraph 7.

³⁹ *Analysis of the written responses*, paragraph 6.3.

⁴⁰ *Analysis of the written responses*, paragraph 6.12.

⁴¹ *Analysis of the written responses*, paragraphs 6.7-6.8.

⁴² *Analysis of the written responses*, paragraph 6.9.

The new Code of Practice Part B will consider both quality and enhancement, as the two are inextricably linked: 'a key element of an effective enhancement strategy involves knowing where one is starting from, ie how does the institution assure itself that standards and quality are being appropriately maintained? This can then be linked to the related element of the management of enhancement - improving the effectiveness of student learning, seeking to learn from current activities, reference points and good practice, and to make the most effective use of resources to support engagement and high quality learning. Assurance and enhancement are inextricably linked within the quality cultures of institutions'.⁴³

Proposal 4: QAA should set out how the components of a revised Academic Infrastructure relate to other relevant reference points used by higher education providers.

This will be addressed through the development of a road map, which sets out how the Code of Practice relates to other parts of the quality assurance system. The following are elements that may need to be included:

- the overarching quality frameworks for the different nations of the UK⁴⁴
- the audit and review processes conducted by QAA
- the internal monitoring and review carried out by higher education providers
- the role of professional, statutory and regulatory bodies
- the Standards and Guidelines for Quality Assurance in the European Higher Education Area.⁴⁵

Detailed cross-referencing to these and other reference points will be included throughout the Code of Practice.

Background evidence

In responding to the discussion paper, 'several respondents identified the need to take account of a wider context. This could include consideration of the outcomes of the National Student Survey and judgements made by the Office of the Independent Adjudicator (OIA) or the Scottish Public Services Ombudsman (SPSO). Some respondents also requested greater clarity about the relationship between the Academic Infrastructure and the European Standards and Guidelines. It was also suggested that the development of a 'roadmap' explaining how different quality assurance and enhancement activities fitted together'.⁴⁶

More specifically, 'the other main area which respondents noted as requiring attention was the relationship of subject benchmark statements to the requirements of professional and regulatory bodies. Several respondents noted that where alignment had already occurred (for example, in engineering), this had reduced the burden of bureaucracy for institutions. However, one respondent noted that it was important that the responsibility for subject benchmark statements... remain with the academic community, because not all students would necessarily wish to enter the associated profession. It was also suggested that there would be value in making greater links between the benchmark statements and relevant sector skills council frameworks and national occupational standards'.⁴⁷

⁴³ *Handbook for enhancement-led institutional review: Scotland* (second edition) (2008), paragraph 10.

⁴⁴ See www.hefce.ac.uk/pubs/hefce/2010/10_17/ (for England and Northern Ireland), www.hefcw.ac.uk/documents/publications/circulars/circulars_2008/W08%2031HE%20circ.pdf (for Wales) and www.qaa.ac.uk/scotland/aboutus/qualityframework.asp (for Scotland).

⁴⁵ [www.engq.eu/files/ESG_3edition%20\(2\).pdf](http://www.engq.eu/files/ESG_3edition%20(2).pdf).

⁴⁶ *Analysis of the written responses*, paragraph 2.17.

⁴⁷ *Analysis of the written responses*, paragraph 4.10.

Proposal 5: QAA should continue to ensure that the reference points for setting, maintaining, assuring and enhancing academic quality and academic standards remain robust, flexible and up to date.

This will be addressed by the development of published protocols for the development and revision of the Code of Practice. A draft protocol is included in the consultation document. Once the Code of Practice has been developed, a programme of review will be established. At regular intervals, the need for revision of existing chapters or the addition of new chapters will be considered. It will not be assumed that review necessarily leads to revision if the content of a chapter is considered to remain appropriate. Mechanisms will also be developed by which the need for revision of particular chapters can be brought to the attention of QAA outside the programme of review.

The consultation document also sets out several areas already identified for future work in relation to the Code of Practice:

- the status of credit frameworks and the place of level descriptors
- the development of Part C of the Code of Practice on information.

It is intended that the Code of Practice will be flexible to respond to developments in the higher education environment.

Proposal 6: QAA should undertake to create public awareness of the framework for academic standards and academic quality in UK higher education.

This will be addressed by the implementation of the proposed changes to the Academic Infrastructure, to create the UK Code of Practice for standards, quality and enhancement in higher education. The creation of a single definitive reference point is intended to make it easier to explain to a wider audience about the framework which underpins how higher education providers set and maintain academic standards and assure and enhance the quality of learning opportunities. In addition, the following set of principles, derived from the recurrent themes of the current Academic Infrastructure, can be used to summarise the purpose of the Code of Practice:

- students have the opportunity to contribute to the shaping of their learning experience
- all students are treated fairly, equitably and as individuals
- students are properly and actively informed at appropriate times of matters relevant to their programme of study
- all policies and processes relating to study and programmes are clear and transparent
- strategic oversight of academic standards and academic quality is at the highest level of governance of the provider
- all policies and processes are regularly and effectively monitored, reviewed and improved
- sufficient and appropriate external involvement exists for the maintenance of quality and standards
- staff are supported in enabling them to support students' learning experience

A communication strategy for promoting the new Code of Practice to a range of audiences will be developed. It is envisaged that this will include the development of a new website,

which provides links to all the areas covered in the Code of Practice and other related documents.

Summary

Details of the new UK Code of Practice for standards, quality and enhancement in higher education are set out in the consultation document available at www.qaa.ac.uk/news/consultation/AI/. Anyone with an interest in higher education is welcome to submit a response to this consultation, via QAA's website or by email to academicinfrastructure@qaa.ac.uk. Responses should be with QAA by 1 March 2011.