

Higher Education Funding Council for England (HEFCE)

Future arrangements for quality assurance in England and Northern Ireland

Response on behalf of the Society of Biology

Question 1: Strongly Agree

Comments: However this is for the general public, employers and funders to decide.

Question 2: Agree

Comments: There is a danger that it's too ambitious regarding the amount of information that is disseminated to the general public which would a) swamp students with information and b) over work the higher education institutions.

Point Dii) we have concerns about how QAA plans to ensure the engagement of students.

Point Eii) and Eiii) we strongly agree with both these objectives.

Point Fii) we strongly disagree with this objective. Students will not have sufficient experience to be involved at this level and therefore a professional inspectorate will be much more effective.

Point Fiii) we strongly disagree with this objective. In the past there has been plenty of scope for rigorous institutional self-evaluation, however it has either not happened or it has been so subjective as to be worthless.

Point Giv) We agree that the principle of collecting information once to use in many ways is vital to make the various audit demands placed on HEIs manageable. There is especially a need for a better system of tracking the destination of students post HE across the UK, therefore we would recommend an investment in a UK wide database that all HEIs can upload information to and search under a set criteria.

Question 3: Agree

Comments: Whilst we generally agree with all the statements there is a need for clear concise English to be used, as some statements are open to interpretation.

Point 38a) this statement will pose a challenge to HEIs who need to alter their themes in a flexible manner.

Point 38c) include the word 'objective' into this characteristic and ensure an evidence based process is in place.

Question 4: Strongly Agree.

Comments: We strongly agree with the two bullet points in paragraph 42.

Question 5: Disagree

Comments: Comparability across all institutions might be extremely difficult if not impossible to achieve, and we suggest that in order to offer true comparability to the end user the use of student transcripts should be encouraged in this process. This may mean some education of employers is needed, to show how transcripts provide a better solution to their needs than an artificial constraint which will still not differentiate between students in the job market. Comparability is difficult due to the diverse number of degree pathways offered and the modular choice within this, the use of transcripts would go some way to rectify this.

Point 45b) we would agree that within the standards there should be an inclusion of practical work and skills outcomes.

Question 6: Strongly agree

Comments: This is very important as some of the current terms are too open to erroneous negative interpretation. This process should be done with a strong focus on objectivity.

Question 7: Strongly disagree

Comments: Institutional audits should not under any circumstances make judgements on the reliance and accuracy of information supplied by a HEI, this system can only make a comment on the information provided and should depend on a system of checks and balances that does not allow HEIs to consistently lie or misrepresent information.

A judgement statement could be construed as centralisation of the HEI which currently works under an autonomous process; we strongly feel that in some cases this could lead to the inspectorate facing court cases and civil action suits.

Question 8: Agree

Comments: We agree that this is an excellent idea however we would urge QAA to ensure that any report provided was good quality. We would suggest that any summary produced was reviewed by the HEI in question to insure that issues of fact are correct.

Any summary produced should ensure that jargons and meaningless terms such as 'world class higher education' that do not offer further information should be removed.

Question 9: Agree

Comments: We agree that this could add considerable flexibility to the process however only if the procedure and rules remain constant from institution to institution.

Question 10:

Comments: Other than the points already raised in the previous questions the Society of Biology wishes to raise the following points:

- There is an issue with the quality of data and its description that affects comparability.

- The institutional review process has improved for HEIs over the last decade, however there is concern that the information being pulled out is not actually the information required to audit the system correctly.
- In 66.1 there is mention of the link to students in the QAA process, we would argue strongly against such a development and cannot see how they would add value to the process at this level. Most HEIs involve students in their internal assessments and we believe that this will add the most value.