Quality Assurance and Accountability – Why can't they just leave us alone?

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Check against delivery

"Why can't you just leave us alone?" Canada is the 38th country I have visited in the last ten years or so, to lead accreditation reviews, to train reviewers, or to talk about accreditation and quality assurance. And it is no surprise to hear again that familiar refrain! Too often, quality assurance is seen as something that is "done to" people, rather than something that is an integral part of the way in which teachers do their job.

I want to look at international trends in the quality assurance and accreditation of higher education, to reflect on some current issues, and to look at challenges that lie ahead.

The contexts within which quality assurance operates

So, why can't you just be left alone? The short answer is because you are too important. The move from university systems catering for a small elite, to an era of mass participation in higher education has altered dramatically the social position and economic importance of higher education.

Most countries now have some form of external evaluation that enables it to be demonstrated that higher education institutions are functioning effectively in enabling their students to achieve appropriate standards of attainment and ability. The reasons why such evaluation systems have developed are similar throughout the world.

At the **global** level, countries need to demonstrate that their education systems match world class standards. Jobs can be moved readily from one country to another, and multi-national employers do not hesitate to relocate jobs to their maximum advantage. The movement of manufacturing jobs, mostly to countries with lower labour costs, has been taking place for many years. Electronic technology now means that service jobs can also be moved, with the relocation of software development, call centres and back office functions being particularly noticeable. There will be many factors influencing relocation, including cost, access to markets, and the regulatory environment. However, one factor is undoubtedly the availability of a workforce with appropriate skills. Increasingly, the skills that are sought are those provided by higher education.

One measure of the international standing of national higher education systems and of individual universities and colleges is the ability of their students to secure employment, or to progress to postgraduate study in other countries. Increasingly,

another measure of international standing is the willingness of multinational employers to take advantage of the skills of a workforce as a whole, by locating their operations in the country concerned. Meeting international standards is no longer an option or an aspiration, it has become a necessity. The achievement of the few is no longer a sufficient indicator of international standing, it is the achievement of the many that matters as well. It is no coincidence that one multinational employer described countries without well-developed higher education systems as being in danger of becoming "globally irrelevant". Significantly, this was not a warning to developing countries that they needed to catch up, it was a warning to a developed country about the dangers of complacency. Rupert Murdoch, speaking in Melbourne about the international market for human capital, said that this would result in *"a brain drain from countries that don't have top-notch institutions of higher education".*[1]

Governments are concerned with attracting employment to their countries, thus governments need to be able to demonstrate that they can offer a workforce with appropriate skills. Evaluation processes need to be able to demonstrate that higher education institutions are producing students with relevant competences. Benchmarking learning outcomes against world standards becomes vital.

At the **regional** level similar challenges arise. In most parts of the world countries are moving towards the establishment of regional single markets. Such markets exist, or are being developed, in Europe (the European Union), South America (MERCOSUR), North America (NAFTA), the Caribbean (CSME) and South East Asia. Within such free trade areas, there is often actual or planned provision for the free movement of goods, services, capital and labour. The free movement of labour, and the right to establish in another country using the home professional title, depend upon mutual recognition of qualifications. In turn, such mutual recognition depends upon member state governments being able to show that the standards of their qualifications are comparable to those of their partners.

In this context also, evaluation processes must demonstrate the nature and level of the learning outcomes of higher education programmes, in this case in terms of the competence to work effectively in specified occupations.

At the **national** level, countries have high expectations of their higher education institutions. Universities and colleges have a vital role to play in meeting the developmental needs of the country, and the challenge of global competition. At the same time, policies of equity and social inclusion demand a widening of participation in the opportunities offered by higher education. Growing awareness of the importance of higher education means that its achievements are no longer taken for granted and left unquestioned. As countries educate a greater proportion of their citizens to a higher level, it can be expected that the skills of questioning and of constructive criticism that come from that education, and the expectations of accountability that are a characteristic of a democratic society, will be applied as much to universities as to any other institutions of society.

All of these contexts show why governments find it necessary to have some form of independent assurance about the standards achieved by students in higher

[1] Keith Murdoch Memorial Oration – Rupert Murdoch, quoted in THES, 26.12.2001

education institutions. It is necessary to demonstrate that achievement matches the world class standards expected by inward investors. It is necessary to demonstrate that standards are comparable with those of partner countries in a regional free trade area. It is necessary to demonstrate that higher education is performing effectively in meeting national economic and social needs. There is a need also to ensure that all interested members of society – students and their families, employers and professional bodies, the cultural and scientific communities – have access to independent and impartial information about the performance of their higher education institutions. It is the processes of external evaluation that will allow universities and colleges to answer the questions and challenges that are posed to them, and to hold themselves accountable.

Characteristics of quality assurance

WHY DO WE DO IT

The purposes of external monitoring and evaluation of higher education can be summarised as:

- **Accountability** – to those who pay for higher education. This includes the state, individuals and their families and employers.
- **Information -** for those who need to know about the standards that are achieved by students. This includes employers, governments and potential students themselves.
- **Enhancement –** of the quality of educational provision, through learning from identified strengths and weaknesses, and the sharing and dissemination of good practice, both within and between institutions.

WHAT DO WE LOOK AT: INPUTS, PROCESSES AND OUTCOMES

Most quality assurance and evaluation systems go through a process of evolution. When first established, systems tend to be concerned with measurement of **inputs**, particularly the physical and staff resources of institutions. There is an assumption that, if adequate resources are present, quality will be guaranteed. This, of course, is not true, as much will depend on the effectiveness with which resources are deployed. Accordingly, the next stage of development of evaluation systems is to consider **processes** (particularly the processes of teaching and learning), often through a system in which judgements are made by peer review. The drawback to this approach is that it is producer oriented, with providers of educational programmes being assessed by peers who are themselves providers.

Mature evaluation systems are based upon **outcomes**, and in particular the learning outcomes that it is intended that students should achieve. Inputs and processes are of vital importance, as they shape the learning experience that is made available to students. Peer judgements of processes remain valid. However, for those outside higher education institutions, and in particular employers, it is the abilities of students that matter. They are concerned with what students are able to do in their first employment. That is why many national benchmarks for higher education

qualifications address skills that are transferable from academic study to the work environment and to the community more generally.

Outcomes are set, for individual programmes, by reference to such national benchmarks, to professional body requirements (including international professional standards, such as the Washington accord on engineering qualifications), to the standards set by the university or college, for the award of its own degrees, and to the expectations of employers. The adequacy and effectiveness of both inputs and processes can then be judged against the outcomes it is intended that the learner should achieve. In this way an holistic judgement can be made that has regard to the effectiveness of processes and of the utilisation of resources, in relation to intended outcomes; as well as to the appropriateness of the outcomes themselves.

A move to outcomes based evaluation from an evaluation system based more on inputs represents a shift from the quantitative to the qualitative. The consequences of this shift can be deceptive for both institutions and evaluators, if proper thought is not given to what is involved. Some may regard the process as easier, because it requires a narrative account rather than the presentation of numerical data. That would be a superficial and wrong view. The process is more searching, because the account must be reflective, and provide a justification of why things are done, and why they are done in the way that has been chosen. Effectiveness of process has to be demonstrated, in relation to intended outcomes. Factual data is still required, but to support a case that a department is performing effectively, rather than as an end in itself. The approach is less prescriptive, for example a department must decide whether a particular set of data is relevant to a demonstration of effectiveness, rather than providing it simply because it has been required.

HOW DO WE GO ABOUT IT

The “rules of engagement” for external evaluation should be clear. Inevitably, some will perceive evaluation as having regulatory overtones. Good evaluation systems are not regulatory in the sense of demanding compliance with a norm. They are about providing assurance that appropriate objectives are being set and achieved. Higher education draws much of its strength from diversity and plurality, and evaluation criteria should recognise that. Nevertheless, to the extent that such systems may be perceived, rightly or wrongly, as being regulatory, it is sensible to follow the precepts of good regulation.[2]

Briefly, these require evaluation systems to be:

- **Transparent** – with judgements being made against clear and understood criteria.
- **Appropriate** – with scrutiny considering only those things that are relevant to the judgement to be made.
- **Proportionate** – with the burden of the scrutiny exercise being kept to the minimum necessary to make reliable judgements.

[2] Adapted from the Principles of Better Regulation, published by the UK government Better Regulation Task Force

- **Accountable** – with evaluators operating within a framework within which there is accountability for their work.
- **Consistent** – between institutions and over time.

Institutional audit and Programme review

There are two main approaches to evaluation of higher education. The first approach is that of a direct assessment of educational outcomes, with evaluation being of the individual programmes that lead to those outcomes. This can provide a basis for the accreditation of those programmes. The second approach is that of an audit of the quality systems of an institution, to determine whether these are sufficiently robust and effective to ensure that all programmes are well designed and deliver appropriate outcomes. Such an audit will not normally make direct judgements on individual academic programmes, but it will consider programme-level evidence to the extent necessary to establish that institutional systems are functioning properly. This type of review provides a basis for institutional accreditation.

There is much debate, throughout the world, on the appropriate balance between programme and institutional based approaches. I am told that the debate is current in Ontario, and I will try and offer some thoughts on it.

Sometimes the debate is framed in terms of the question with which I started – why can't they leave us alone – and is about relative levels of perceived burden of external intervention. In the UK there was a shift to a system of institutional audit which was justified, in part, by a desire to reduce the burden on institutions. This resulted in scrutiny of programmes only as a "drilling down" to demonstrate that institutional systems were working, and not for the primary purpose of scrutinising the programmes themselves. There is some risk that arguments about the burden of external scrutiny may appear self-serving, and may even be seen as what a 1973 report of the Securities Subcommittee of the United States Senate described as:

"The natural lack of enthusiasm for regulation on the part of the group to be regulated, the temptation to use a façade of industry regulation as a shield to ward off more meaningful regulation...".[3]

The potential burden of over-regulation is a real issue. However, it is not the best starting point for a debate about the most appropriate form of external scrutiny of higher education. It is better to start from a consideration of what each of these approaches can deliver by way of the three outputs from external evaluation: accountability, information and enhancement; and to look at these from the perspectives of society as a whole, the institution itself, and individual customers.

ACCOUNTABILITY

There are two major accountability issues that are addressed most effectively at the institutional level. The first of these concerns the role of the institution, in relation to the totality of higher education provision in a country.

[3] Securities Subcommittee of the US Senate, *Report,* 1973

Expansion of higher education often involves the upgrading of some colleges to full university status. This has been a route used over many years to develop universities. Around the world, many august institutions have their origins in more humble predecessors. In my own country, the University of Manchester traces its roots to the Mechanics Institute, and similar acorns have given rise to many magnificent academic oaks. More recently, there has been a tendency, on the part of governments, to upgrade whole categories of institution. A number of countries have learned lessons from the experience of the United Kingdom in upgrading the largely vocational polytechnics to universities, some fifteen years ago.

Seduced by their new titles and enhanced status, a number of the polytechnics sought to adopt a research-led approach to their teaching, accompanied often by a reduction in the availability of vocational courses, and a significant shift away from one and two year courses, in favour of full degree programmes. This “mission drift” was perceived widely to be undesirable, and a number of countries, going through similar processes of change, have sought to guard against it. It occurred in the United Kingdom, at least in part, because the legislation that governs state funding of higher education prohibits the government, or its funding council, from giving directions to universities or colleges about the mix of programmes they should provide. That was intended as a protection of academic freedom. It may be an appropriate safeguard for research and research-led teaching but, arguably, it is inappropriate in relation to the employment-led programmes that need to be a part of a higher education system based on mass participation – a theme I shall return to later.

The United Kingdom is now seeking to correct this “mission drift” by active encouragement of the development of two year, employment related foundation degrees, and by a greater focus of research spending on centres of excellence.

A few years ago, in South Africa, I met the then education minister Kader Asmal, who expressed to me his determination that the transformation of higher education that followed the apartheid era should not suffer from the same mission drift. He said to me “We will not make the mistakes you did”.

Whilst many countries have been anxious to maintain a plurality of provision as higher education expands, few have addressed this directly, on a system wide basis, through external review and funding mechanisms. One that has is Hong Kong. Diversity of mission is maintained by each higher education institution having a role statement that is agreed between it and the University Grants Committee. The external review process (broadly equivalent to institutional audit) is used to support this, through a process known as the Performance and Role-related Funding Scheme. External review considers the extent to which an institution is adhering to its agreed role, and how effectively that role is being performed. A proportion of the public funding that is available is allocated according to an assessment of adherence to, and effective performance in the agreed role. An institution that departs significantly from its agreed role may place a proportion of its public funding at risk, whilst an institution that performs particularly well in its role may qualify for additional funding.

In this way a review of institutional level performance is used to ensure that the higher education system delivers the balance of research-led, employment-led and liberal arts based higher education that is felt to be appropriate to the needs of Hong Kong. It means that quality assurance addresses not only the traditional issue of fitness for purpose, but also the more fundamental question of whether the purpose was appropriate in the first place.

Another example of institutional level scrutiny supporting public policy comes from Trinidad and Tobago. The country is investing the revenues from its extensive natural resources in oil and gas in education, with a generous system of support for individual students, and significant investment in facilities. Understandably, the Government is anxious to ensure that funds from the Government Assistance for Tuition Expenses (GATE) scheme go only to students registered at *bona fide* institutions. It has an accreditation scheme focused initially at the institutional level, with a first stage of registration designed to establish that the institution actually exists, and is properly established. Sadly, that is all too necessary in an era in which the internet has enabled the bogus diploma mills to thrive and to separate the gullible from their cash in the unregulated world of cyberspace.

Overall, the accountability of higher education institutions involves more than programme accreditation. It is institutions that manage programmes of study, and manage the other activities that higher education delivers for the benefit of the community, such as research and knowledge transfer. Governments have proper expectations that universities and colleges will promote policies of equity and social inclusion, and that they will play their part in the economic development of the country. In doing this, institutions are more than the sum of their programmes.

Furthermore, it is prudent to monitor and evaluate the institutional systems that ensure the quality and standards of programmes. It will never be possible to review every single programme of study, even those external accreditation systems that are based on programme review tend to review whole departments, sampling programmes within them. This means that much reliance is placed on internal systems of programme approval, monitoring and review. Scrutiny of these helps give confidence that robust internal systems will result in good quality programmes.

INFORMATION

There are overlaps between the demonstration of accountability and the provision of information. For governments, the two are a part of the same process, as accountability is information based. It starts with knowing what an institution is doing, and goes on to consider how well it is doing it. The Hong Kong Performance and Role-related Funding System is a classic example of this. However, for the individual, be they potential student or prospective employer, information is needed at programme level. Students enrol on programmes of study, not on institutional systems, and they will require information about the quality of the programmes on which they are considering enrolling. Similarly, employers are interested in what graduates can do; and the combination of knowledge, conceptual understanding and practical skill that defines graduate abilities is developed through individual programmes. Employers will place a greater value on information about programmes, and especially on those designed to meet particular employment

needs, than on information about institutional systems, as the latter is at one step removed from their primary interest.

Individual motives for undertaking a higher education will be complex and varied. Many students will seek simply the personal, transformational experience of study at the limits of our knowledge and understanding, for personal growth and development; the classic pursuit of knowledge for its own sake. More will combine this with a wish to be assured that their efforts will be rewarded with a qualification that will give them an advantage in the job market. Some will take a fairly utilitarian approach, seeing higher education as mainly a means to the end of employment in their chosen field.

Employers will be concerned with the abilities of graduates to perform effectively in a variety of roles. Some will seek occupationally specific skills, notably in the traditional professional fields such as medicine and law, but also in newer fields of employment where high level skills are needed. Most will seek more general abilities, particularly the problem solving skills that are transferable to many contexts from the academic disciplines in which they were first developed.

What is common to both students and employers is a need for reliable information about qualifications. In higher education, we often describe student achievement by reference to academic standards that are related to the level and complexity of knowledge that has to be mastered, and the understanding needed to order that knowledge.

However, when we look at the expectations of the users of higher education, we find they are expressed rather differently. Users do not use passive words like “knowing” and “understanding” to express their expectations. They use the active word “do”. What will I be able to do with my qualification? If I employ a graduate, what will he or she be able to do?

In the small and elite higher education systems of the past, the narrow social grouping that formed the graduate elite knew from personal experience what it was that a graduate could do. In the mass participation systems of today, that which can be done by a graduate needs to be made explicit. The outcomes of higher education should be expressed not just in terms of what a student knows and understands, but what a student can do.

As Lord Dearing and his colleagues put it in their report on higher education in the United Kingdom (1997): “*there is much to be gained by greater explicitness and clarity about standards and the levels of achievement required for different awards.*”[4]

In 1999 the Higher Education Funding Council in England published a report on the provision of public information on the quality and standards of higher education courses. This found that amongst applicants for places in higher education:

[4] ‘Higher Education in the Learning Society’ – Report of the National Committee of Inquiry into Higher Education (the Dearing Report), HMSO, London, July 1997

"*There is substantial interest in obtaining more information on quality and standards … at the course level. Curriculum information, and levels of academic attainment are of major interest, but other factors are also important such as what the higher education institution is seeking to equip its graduates for and how well a course is taught."*[5]

Young people committing years of their lives to study need to have confidence that high standards are set by universities and colleges, and are achieved by their students. But this research, by highlighting the concern of applicants about what graduates are being equipped for, reinforces the importance of making clear what it is that graduates will be able to do.

The report noted the implications of the individual bearing a greater share of the costs of their higher education. It said:

"… students, and possibly also their parents, will behave more like customers in relation to higher education. They will expect more information to inform their choice of where and what to study. They will also expect what they are paying for to be better defined so that they and others can judge what they are receiving is satisfactory."[6]

These information needs are particularly acute amongst those Governments most wish to attract into higher education. The report found that:

"Entrants from non-traditional backgrounds are less likely to have social networks of contacts with previous experience of higher education. As such we would expect them to have greater demands for formal information sources including quality and standards information."[7]

The formal information sources that are trusted are those that are demonstrably independent. The report said:

"It is clear that applicants treat claims made by the higher education institutions with some scepticism, even though they find the information valuable."[8]

This finding confirmed a conclusion of a report published earlier that year which said:

"Although prospectuses were rated highly by the majority as being very useful, they came in for some criticism by the students interviewed. Many recognised that they were a 'selling tool' which were being used to attract them and could be rather 'rose-tinted' and therefore not to be fully trusted."[9]

[5] 'Providing Public Information on the Quality and Standards of Higher Education', - Higher Education Funding Council for England, November 1999
[6] Ibid
[7] Ibid
[8] Ibid
[9] "Making the Right Choice: How students choose universities and colleges" – Institute of Employment Studies, June 1999

In the United Kingdom, the response to the Dearing Report recommendation, and the research findings calling for fuller, independent information for prospective students, was the development of a Qualifications Framework[10], first published in 2001, with descriptors based not only on achievement of knowledge and understanding, but also on the intellectual competences they will take with them in to employment – what they are able to do.

The emphasis on graduate competence might have provoked criticism of a utilitarian approach to learning. On the contrary, the descriptors were widely welcomed within the academic community. Higher Education Review[11] praised the honours degree descriptor as *"a carefully worded statement that, remarkably, can be applied across the whole range of courses and subjects at honours degree level".* Its requirement for students to demonstrate "an appreciation of the uncertainty, ambiguity and limits of knowledge" was welcomed as "*an understanding of epistemological issues that many academics still seem to lack".* The descriptor has been used widely throughout the world – including in Ontario, and sometimes in combination with descriptors for vocational qualifications, to produce a single framework for all post-school qualifications.

Students need information about the outcomes of higher education programmes, because this helps them to identify progression routes to further study and potential career pathways. But they also have a keen interest in teaching quality. In late 2007 the market research firm i-graduate surveyed 54,836 overseas students from 221 countries studying at 71 UK universities. Teaching quality was ranked as the single most important factor in decisions about where to study. The reputation of the qualification – perhaps a proxy for the outcome – ranked second. Perhaps surprisingly, the cost of study ranked only 9th.[12]

Students and employers need information about learning outcomes, and students want information about the quality of teaching. That information will carry greater credibility if it is independently assured, indicating an important role for programme accreditation.

An example illustrates the point. For twenty years the University of the West Indies stayed outside the national accreditation system operated in Jamaica. With good reason, it relied on its international reputation, its Royal Charter, and its systems of external examining as guarantors of the quality of its provision. Last year it took the first steps to secure Jamaican accreditation. It did so because of a growing expectation amongst potential students that, regardless of institutional reputation, good quality programmes should demonstrate their worth through accreditation.

There are lessons from other sectors of the economy that higher education would do well to heed, concerning the need for clarity, and independent information about services. In a scathing attack on the mis-selling of mortgage endowment policies, the Chief Financial Services Ombudsman Walter Merricks asked:

[10] "The Framework for Higher Education Qualifications in England, Wales and Northern Ireland" – QAA, January 2001
[11] Editorial – Higher Education Review, Vol 33, No 2, 2001
[12] Reported in Education Guardian (London) 5.2.2008

"Are there other combinations of poor sales practices, opaque products and market factors which are liable to generate similar surges in complaints, and of which industry professionals are already aware? Or can we be sure there are no more skeletons lurking in the cupboard?"[13]

For *"poor sales practice"* read recruitment procedures concerned more with filling places than matching the aptitudes and abilities of students to the demands of programmes. For *"opaque products"* read poorly defined outcomes and standards. For *"market factors"* read the pressures to hit numerical and financial targets. The combination of circumstances that gave rise to complaints about financial products that failed to live up to expectations could easily give rise to similar complaints about investments in higher education that failed to deliver what the user expected.

After some false starts, it now looks as if the financial services sector will be subject to the sort of regulation and quality assurance that will ensure that the system meets the needs of the user. Many young parents will now be investing to meet the costs of the higher education that their children will be entering in ten or fifteen years' time. It would be ironic if their savings schemes turned out to provide more effective and transparent safeguards and better public information than that available about the higher education those savings are intended to purchase.

ENHANCEMENT

For individual institutions, an important issue will always be the stimulus to improvement provided by external review. The Council for Higher Education Accreditation in the United States publishes a valuable "Presidential Guidelines Series". The December 2007 edition[14] addresses the benefits of accreditation. It says: *"Accreditation … is about institutional or program quality review and improvement".* It highlights opportunities, saying, for example, that the accreditation process *may be the stimulus needed on many campuses to attend to the issue of student learning outcomes"* and quotes one President's view that *"the self-study is the most valuable element of the accreditation process".*

In considering the relative merits of institutional and programme level scrutiny, institutions might wish to ask themselves what form of scrutiny might be of greatest assistance to them, in improving the quality of their provision and maintaining the level of their standards.

For example, with respect to quality, a common student complaint concerns feedback on written work. When I was running the Quality Assurance Agency for Higher Education in the United Kingdom, in the late 1990s, the commonest complaint that arose from students in the course of programme review was about the timeliness and adequacy of feedback. It was depressing to read in the THES, earlier this year that feedback remained "*students' single biggest gripe"*[15]*.* The 2007 National Student Survey found that only 54% of students agreed that feedback had been prompt and instructive. Would the knowledge that this would be a factor taken

[13] Annual Report of the Chief Financial Services Ombudsman (United Kingdom), 2001
[14] Presidential Guidelines Series, Vol. 1 – 6. Council for Higher Education Accreditation, Washington, December 2007
[15] 2007 National Student Survey (United Kingdom), reported in THES, 4.1.2008

in to account in external reviews of programmes produce a better performance? I would like to think so.

Another area of potential interest to institutions concerns benchmarking of standards. Last year Dennis Mock and I were a part of the team that reviewed the Mona Campus of the University of the West Indies. We were fascinated by the debate that was going on about the use of external examining. Faculty with a background in United Kingdom higher education were enthusiastic advocates of its retention. Faculty with a North American background wondered what all the fuss was about.

Too often, the debate was posed as one about the perceived burden and delay inherent in the system being used. Obviously, some system of moderation of assessment was needed, but external examining is not the only way of providing that. Of equal, and some might say greater importance, is the role of the external examiner in benchmarking the standards of the awards of the university against those of their peer institutions.

The Quality Assurance Agency for Higher Education in the UK describes the main purposes of external examining as being:

"to verify that standards are appropriate for the award or award elements which the external examiner has been appointed to examine, to assist institutions in the comparison of academic standards across higher education awards and award elements, and to ensure that their assessment processes are fair and are fairly operated and are in line with the institution's regulations."[16]

The "general principle" set out in the QAA Code of Practice elaborates this audit based approach:

"An institution should require its external examiners, in their expert judgement, to report on:

- *Whether the standards set are appropriate for its awards, or award elements, by reference to published national subject benchmarks, the national qualifications framework, institutional programme specifications and other relevant information;*
- *The standards of student performance in those programmes or parts of programmes which they have been appointed to examine, and on the comparability of the standards with those of similar programmes or parts of programmes in other UK higher education institutions;*
- *The extent to which its processes for assessment, examination, and the determination of awards are sound and have been fairly conducted."*[17]

What is of interest in this specification is the balance between the benchmarking of standards and the moderation of individual assessment results. The predominant emphasis is on benchmarking. It is appropriate for any institution to ask itself how it

[16] "Code of Practice for the assurance of academic quality and standards in higher education, section 4: External Examining" – QAA, January 2000
[17] Ibid.

knows that it continues to match the standards of its peer institutions. External examining is not the only way of doing this. In the North American tradition peer review of standards comes largely through external review at subject or programme level. In considering the appropriate balance between institutional and programme level systems of review this should be a significant consideration.

Around the world, the pendulum is still swinging between institutional and programme based approaches to accreditation. The push towards institutional level systems comes from a sense that programme level scrutiny can become burdensome, and the reality that there is a very large number of programmes out there, and scrutinising them all is a major task. In some cases the push comes as well from a philosophy that regulation ought to be close to the point of delivery, so institutions ought to be allowed to assure the quality of their own programmes, so long as their systems are subject to some external review.

The push towards programme review reflects the reality that students and employers want information about the individual programmes they will follow, or from which they will recruit staff. The growth of the “diploma mills”, fuelled by the internet, has led many to seek the assurance that programmes they follow are accredited. The more sophisticated of the diploma mills offer qualifications based on “life experience”, thus placing their supposed “programmes” at the centre of the scam. Not surprisingly, providers of genuine programmes seek accreditation at this level.

There is no single right answer. Systems of quality assurance will have many common elements, but they will differ between countries. They need to reflect the way in which higher education systems have developed over time, and the social, political and economic contexts in which universities operate. For me, a key consideration is risk. What is the risk of standards not being achieved, or quality becoming unsatisfactory? External intervention must have regard to that risk, and be proportionate to it.

Perception is also important. The absence of visible external scrutiny, in an age in which the public expects continuous reassurance about the quality of public services, through audit of one kind or another, may itself pose some reputational risk.

And lastly, do not assume that this is a decision for the higher education community alone. Already, a huge number of programmes are subject to the accreditation of professional bodies. As more occupations demand the levels of skill that are developed within higher education, the pressure for programme accreditation is likely to grow. In the United Kingdom, programme review by the QAA has been scaled back substantially. One response has been the growth of employer led accreditation schemes, at the programme level. The organisation that I chair, Skills for Justice, now runs the Skillsmark accreditation scheme to enable employers in our sector to identify good quality, work related programmes, whether offered by universities, colleges or private providers.

The twin paradigms of modern higher education

"Why can't they leave us alone?". In this final section, I want to look more closely at who "they" are. "They" are not just accreditation bodies. As I hope I have demonstrated, it is society at large that has good reason to hold universities and colleges to account, and accreditation bodies are simply the instrument of that wider societal interest.

I sometimes get the impression that the "they" that is feared is employers, and that the interests of employment are perceived as sullying academic purity. This attitude makes no sense, and ignores the vocational traditions and origins of higher education.

In my view, there are two main paradigms of modern higher education, the research led paradigm and the employment led paradigm. They are complementary, and they are combined in different ways, sometimes within a single institution, and sometimes across a national higher education system, with each institution having its own distinctive role. Boyer recognised these multiple roles when he identified the distinct scholarships of discovery, integration, application and teaching. He called for *"a more inclusive view of what it means to be a scholar – a recognition that knowledge is acquired through research, through synthesis, through practice, and through teaching".*[18]

Universities have always been concerned with knowledge and scholarship, but their precise roles have altered over time and within different societies. It is easy to forget that the original purpose of higher education was vocational. In their early years, indeed in their early centuries, the Universities of Oxford and Cambridge were purely vocational, in the original sense of that word, in that they prepared young men for ministry in the Church.

An alternative view was articulated by John Stuart Mill, who set out the case for a liberal education in his inaugural address as Rector of the University of St Andrews in 1867. He said:

"The proper function of a university in national education is tolerably well understood. At least there is a tolerably general agreement about what a university is not. It is not a place of professional education. Universities are not intended to teach the knowledge required to fit men for some special mode of making their livelihood. Their object is not to make skilful lawyers, or physicians, or engineers, but capable and cultivated human beings."[19]

Mill thought it "*very right"* that there should be public schools of law and of medicine, but he considered that:

"what professional men should carry away with them from a university is not professional knowledge, but that which should direct the use of their professional

[18] Boyer "Scholarship Revisited: Priorities of the Professoriate", Carnegie Foundation for the Advancement of Teaching, 1990

[19] J.S.Mill – Inaugural address as Rector of the University of St Andrews, 1867 – from the 'Autobiography of John Stuart Mill'

knowledge, and bring the light of general culture to illuminate the technicalities of a special pursuit."[20]

Mill was right in the value he placed on a liberal education, but wrong in claiming *"a tolerably general agreement"* for his view of the purpose of a university. 43 years earlier the Mechanics Institute had been founded in Manchester, to teach mechanics and chemistry to artisans. This was no modest enterprise by mere rude mechanicals. The group who met, in the Bridgewater Arms, to establish the Institute were the business and civic leaders of their day, and included John Dalton, the father of atomic theory and modern chemistry. In 1851 John Owens, a Manchester textile merchant, left his fortune to found a college, that bore his name, and which offered non-denominational advanced education. In 1880 these two institutions, rooted firmly in the tradition of employment led higher education, came together to secure a Royal Charter as the Victoria University of Manchester.

The reality is that the growth and development of higher education has been driven, predominantly, by the needs of employment. The church, industry and the professions have looked to universities and colleges to provide them with people equipped with the practical and intellectual skills needed for success in employment. Now, an even greater proportion of the working population is in need of the high level skills that universities and colleges nurture, and it is this that lies behind the move to mass participation.

As the United Kingdom government said in its White Paper (a statement of government policy) in 2003:

"Society is changing. Our economy is becoming ever more knowledge-based – we are increasingly making our living through selling high-value services, rather than physical goods. These trends demand a more highly skilled workforce."[21]

In developed economies we are seeing a dramatic shrinkage in the number of unskilled jobs available, and a commensurate growth in those requiring graduate level skills. In the United Kingdom it is estimated that, by 2020, 40% of jobs will require such skills. To that proportion may be added those for which graduate level education may not be an absolute requirement, but for which such education is a distinct advantage. Many developed economies are now aiming to put at least half of the school leaving cohort through some form of higher education. As the institutions preparing half of all first time entrants to the labour market, how can universities take the employment led paradigm of higher education anything other than seriously?

Within universities, attitudes towards the employment-led paradigm often vary by discipline. In fields such as medicine, engineering and law there is a long tradition of programme accreditation by professional bodies, and close links with the world of professional employment. Elsewhere, there is sometimes a suspicion that employers may demand a utilitarian curriculum. In my experience, this fear is unfounded. As the chair of a Sector Skills Council (a body charged with defining the skills needs of a sector of employment) I can tell you that employers have little interest in the

[20] Ibid
[21] "The Future of Higher Education", Department of Education and Skills (United Kingdom), January 2003

curriculum. What they do care about is the outcomes of learning that graduates bring with them to employment.

Employers care about written and oral communication abilities, about inter-personal skills, about attitudes and behaviours, about team working and the potential for leadership, and about the general intellectual skills that support problem solving and critical thinking. A recent statement by the Solicitors Regulation Authority in England and Wales defined the learning outcomes that a newly qualified lawyer should be able to demonstrate on "day one" of professional life[22]. These were grouped under six headings:

- Core knowledge and understanding of the law applied in England and Wales
- Intellectual, analytical and problem solving skills
- Transactional and dispute resolution skills
- Legal, professional and client relationship knowledge and skills
- Personal development and work management skills
- Professional values, behaviours, attitudes, ethics

The balance is interesting; at least half of the outcomes expected relate to general skills needed in employment, rather than hard legal knowledge.

Many of these broader attributes, or transferable skills, are already reflected in the descriptors of the qualifications framework used in the United Kingdom. Each academic discipline develops these transferable skills in its own way. The transferable nature of the intellectual skills associated with a discipline needs to be made explicit to both students and employers. For example, a student of history learns to work with a historical record that is, inevitably, incomplete. The student develops the skill of making defensible judgements from incomplete data. That is a skill valued in many business contexts. Often, commercial judgements have to be made in the absence of complete data. The intellectual skills developed initially through the study of history transfer readily to the world of employment.

Similarly, the biologist learns to interpret data from living systems, in which many variables cannot be held constant. That skill is of ready application to decision making in work environments that are dynamic, with many parameters changing simultaneously. Philosophers are trained (in the words of the subject benchmark statement) "*to recognise methodological errors, rhetorical devices, unexamined conventional wisdom, unnoticed assumptions, vagueness and superficiality*".[23] Bringing those skills of critical scrutiny to bear on business propositions can be of significant value.

To those who fear that "they", who you wish would leave you alone, might interfere with your teaching, I say simply that "we" (for I count myself amongst those with an employer interest) have no wish to do so, we wish merely to be assured that the outcomes achieved by your students will meet our needs. Further, I can see nothing in our desire for transferable, intellectual skills, competence in communication, and appropriate behaviours that is in any way at odds with your academic objectives. If

[22] "Day One Outcomes", Solicitors Regulation Authority (England and Wales), April 2007
[23] "Subject Benchmark Statement – Philosophy", QAA, 2000

your programmes deliver the outcomes of the qualifications framework descriptors I shall be entirely satisfied; if you can demonstrate that, through programme accreditation, I shall be delighted.

Defining programme outcomes, in terms of both generic and subject specific transferable skills, is a process that is gaining credence around the world. This can be seen in the debate about the Bologna declaration of 1999, which had the intention of harmonising both the standards of higher education qualifications, and their nomenclature, throughout Europe. Consistent with a continental European tradition of equating time spent in study with standards achieved, the declaration sought harmonisation on the basis of the duration of academic programmes, expressed as study time elapsed since the acquisition of an earlier qualification. However, there are significant differences in the lengths of programmes in different countries, due to factors such as intensity of study, the age of transition from school to university, and staff:student ratios. Many feel that the duration of study is an inadequate means of calibrating qualification frameworks. There has been a growing interest in calibration by outcomes.

The most ambitious international project to develop statements of the desired outcomes of higher education is "Tuning Educational Structures in Europe"[24], led by the universities of Groningen (Netherlands) and Deusto (Spain). This seeks to augment the Bologna accord by identifying points of reference for generic and subject-specific competences of graduates. It is a recognition that, for progression into either employment or further study, what matters is what the graduate can do, not how long they spent learning to do it.

To the extent that employers are the feared "they", who will not leave you alone, I think you can be reassured, so long as the competence of your graduates speaks for itself, and your programmes are demonstrably delivering the generic outcomes that are appropriate to both employment and intellectual endeavour. However, there is one caveat. Your own behaviours should demonstrate that you value the vocational, employment led dimension of the university or college role. Sometimes, this will involve a recognition that the traditional degree programme is not always the best preparation for some types of employment, and shorter courses may be more appropriate. More often it will involve simply valuing vocational and technician qualifications in their own right.

In some countries, for example Germany, a high value attaches to vocational and technician qualifications. In others, notably the United Kingdom, work-focused higher education courses at the higher technician and associate professional level suffer from what the UK Higher Education White Paper[25] called:

"social and cultural prejudice against vocational education".

Attitudes towards vocational education and training vary significantly between countries. Research[26] published this month compared attitudes and perceptions

[24] "Tuning Educational Structures in Europe" - a pilot project supported by the European Commission. www.relint.deusto.es/TuningProject/index.htm
[25] Ibid
[26] "Skills Development: Attitudes and Perceptions" – City & Guilds Centre for Skills Development, March 2008

towards vocational education in nine countries. The esteem in which vocational education is held was assessed on a ten point scale. The average score was 6.6. To no-one's surprise, Germany topped the list with a score of 8. The UK was second lowest, with a score of 6, with only Hungary scoring lower. Canada came fourth, with a score of 7, marginally behind India and Malaysia.

If, as institutions, your attitudes to work-related higher education are negative, or at best neutral, do not be surprised if employers take their custom elsewhere, or at least demand more onerous external scrutiny, to satisfy themselves that you are performing properly. On the other hand, if you take the "*more inclusive view of what it means to be a scholar"* advocated by Boyer, and celebrate the opportunities for scholarship that arise from innovation, application and practice, you will find enthusiastic partners in the world of employment.

Sadly, there is still evidence of a suspicion about engaging with employers through such scholarship. Recently, my successor at QAA wrote:

"The emergence of 'employer engagement' as a major policy initiative, for example, brings with it a need to work out how institutions can ensure that their academic standards are secured and the value of any resulting awards protected in that novel, volatile and uncharted learning environment."[27]

I am saddened by the presumption that any engagement with employers represents a threat to standards and awards. J S Mill might have agreed, but his view that employment interests should be kept away from higher education did not even reflect the reality of his day. Often, and particularly through professional accreditation of programmes, it has been employment interests that have upheld academic standards.

But it is the word "*novel*" to describe employer engagement that spoke to me of the conservatism that has sometimes done universities no favours. 2008 is the centenary of that wonderful satire on university governance and politics *Microcosmographia Academia* by F M Cornford of Cambridge University. He poured gentle scorn on the idea that universities should set themselves apart from the outside world. He said:

The Principle of Sound Learning is that the noise of vulgar fame should never trouble the cloistered calm of academic existence. Hence, learning is called sound when no-one has ever heard of it; and 'sound scholar' is a term of praise applied to one another by learned men who have no reputation outside the University and a rather queer one inside it."[28]

Cornford also knew how universities dealt with the "*novel"*:

"The Principle of the Dangerous Precedent *is that you should not now do an admittedly right action for fear you, or your equally timid successors, should not have the courage to do right in some future case, which,* ex hypothesi, *is essentially*

[27] Article in THES – P.Williams, 4.1.2008
[28] "Microcosmographia Academia", F.M.Cornford, 1908 (MainSail Press)

different, but superficially resembles the present one. Every public action which is not customary, either is wrong, or, if it is right, is a dangerous precedent. It follows that nothing should ever be done for the first time."[29]

I am sure that, as you seek innovative ways of demonstrating the quality of higher education in Ontario, you will not fall into that trap!

Annexes

Qualifications Framework

This is an example of a qualifications framework for all post-school education, both vocational and higher. The upper levels are taken from the UK framework. It was developed for the Accreditation Council of Trinidad and Tobago.

Checklists for Action

These checklists were designed by the author, for use in his consultancy work, to assist institutions in thinking about their internal quality assurance systems, and in preparing for external review.

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March 2008

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[29] Ibid

Trinidad and Tobago Qualifications Framework

The Qualification Descriptors

The descriptors set out below form a seven level qualifications framework that spans both vocational and academic qualifications. The descriptors are derived from descriptors in other national qualifications frameworks, and represent standards that have widespread international recognition.

Qualifications at Level 1 are awarded to learners who have demonstrated:

i knowledge of the tasks required for the performance of a routine job, and the practical skills to perform those tasks effectively;
ii an ability to apply learned responses to straightforward problems.

Typically, holders of the qualification will be able to:

a carry out clearly defined tasks in a predictable and structured context, to the standard required for employment;
b communicate effectively, to the extent required by the job;
c undertake the training necessary to implement changes in working practice

and will have:

d qualities necessary for employment under supervision.

Qualifications at Level 1 usually use the title "Certificate".

Qualifications at Level 2 are awarded to learners who have demonstrated:

i knowledge of the main principles underpinning practice in a defined field of work;
ii practical skills necessary for employment in a defined field;
iii an ability to apply simple principles to the solution of practical problems in a defined field of work.

Typically, holders of the qualification will be able to:

a select an appropriate approach to the solution of practical problems in the workplace;
b communicate effectively within the workplace, and work accurately from written or diagrammatic instructions;
c apply practical skills to the standard required for employment;
d undertake further training to enhance skills;

and will have:

e qualities necessary for employment requiring the exercise of some personal responsibility in a defined area.

Qualifications at Level 2 usually use the title "Certificate".

Qualifications at Level 3 are awarded to learners who have demonstrated:

i knowledge of the underlying concepts and principles associated with their area of study, an ability to evaluate and interpret these within the context of a related field of employment, and the practical skills to apply their knowledge in the workplace;
ii an ability to present, evaluate, and interpret qualitative and quantitative data, to develop lines of argument and make sound judgements in accordance with basic theories and concepts of their subject(s) of study.

Typically, holders of the qualification will be able to:

a evaluate the appropriateness of different approaches to solving problems related to their area(s) of study and/or work;

b communicate the results of their study or work accurately and reliably, and with structured and coherent arguments;

c apply knowledge and practical skills to the standard required for employment;

d undertake further training and develop new skills within a structured and managed environment;

and will have:

e qualities and transferable skills necessary for employment requiring the exercise of some personal responsibility.

Qualifications at Level 3 usually use the title Diploma.

Qualifications at Level 4 are awarded to learners who have demonstrated:

i knowledge and critical understanding of the well-established principles of their area of study, and of the way in which those principles have developed;

ii ability to apply underlying concepts and principles outside the context in which they were first studied, including the application of those principles in an employment context;

iii knowledge of the main methods of enquiry in their subject(s), and ability to evaluate critically the appropriateness of different approaches to solving problems in the field of study and related employment;

iv an understanding of the limits of their knowledge, and how this influences analyses and interpretations based on that knowledge.

Typically, holders of the qualification will be able to:

a use a range of established techniques to initiate and undertake critical analysis of information, and to propose solutions to problems arising from that analysis;

b effectively communicate information, arguments, and analysis, in a variety of forms, to specialist and non-specialist audiences, and deploy key techniques of the discipline effectively;

c apply knowledge and practical skill to the standard required for employment;

d undertake further training, develop existing skills, and acquire new competences that will enable them to assume significant responsibility within employment;

and will have:

e qualities and transferable skills necessary for employment requiring the exercise of personal responsibility and decision-making.

Qualifications at Level 4 use titles such as Associate Degree or Higher Diploma. In junior professional or technical fields there may be an entitlement to a functional title, such as nurse.

Qualifications at Level 5 are awarded to learners who have demonstrated:

i a systematic understanding of key aspects of their field of study, including acquisition of coherent and detailed knowledge, at least some of which is at or informed by, the

forefront of defined aspects of a discipline;

ii an ability to deploy accurately established techniques of analysis and enquiry within a discipline, and an understanding of how those techniques can be used in employment;

iii conceptual understanding that enables the learner:

to devise and sustain arguments, and/or to solve problems, using ideas and techniques, some of which are at the forefront of a discipline; and

to describe and comment upon particular aspects of current research, or equivalent advanced scholarship, in the discipline;

iv an appreciation of the uncertainty, ambiguity and limits of knowledge;

v the ability to manage their own learning, and to make use of scholarly reviews and primary sources (for example refereed research articles, journals of professional practice or other original materials appropriate to the discipline).

Typically, holders of the qualification will be able to:

a apply the methods and techniques that they have learned to review, consolidate, extend and apply their knowledge and understanding, and to initiate and carry out projects;

b critically evaluate arguments, assumptions, abstract concepts and data (that may be incomplete), to make judgements, and to frame appropriate questions to achieve a solution - or identify a range of solutions - to a problem;

c apply conceptual and problem solving abilities in an employment context;

d communicate information, ideas, problems, and solutions to both specialist and non-specialist audiences;

and will have:

e qualities and transferable skills necessary for employment requiring:

- the exercise of initiative and personal responsibility;
- decision-making in complex and unpredictable contexts; and
- the learning ability needed to undertake appropriate further training of a professional or equivalent nature.

Qualifications at Level 5 use titles such as Baccalaureate, Bachelors Degree, Honours Degree, and Graduate Diploma.

Qualifications at Level 6 are awarded to learners who have demonstrated:

i a systematic understanding of knowledge, and a critical awareness of current problems and/or new insights, much of which is at, or informed by, the forefront of their academic discipline, field of study, or area of professional practice;

ii a comprehensive understanding of techniques applicable to their own research, advanced scholarship or professional practice;

iii originality in the application of knowledge, together with a practical understanding of how established techniques of research and enquiry are used to create and interpret knowledge in the discipline;

iv conceptual understanding that enables the student:

- to evaluate critically current research and advanced scholarship in the discipline; and
- to evaluate methodologies and develop critiques of them and, where appropriate, to propose new hypotheses.

Typically, holders of the qualification will be able to:

a deal with complex issues both systematically and creatively, make sound judgements in the absence of complete data, and communicate their conclusions clearly to specialist and non-specialist audiences;

b demonstrate self-direction and originality in tackling and solving problems, and act autonomously in planning and implementing tasks at a professional or equivalent level;

c continue to advance their knowledge and understanding, and to develop new skills to a high level;

and will have:

d the qualities and transferable skills necessary for employment requiring:

- the exercise of initiative and personal responsibility;
- decision-making in complex and unpredictable situations; and
- the independent learning ability required for continuing professional development.

Academic qualifications at Level 6 use titles such as Masters Degree or Postgraduate Diploma. Professional qualifications usually use the professional title (for example, solicitor, attorney, accountant).

Qualifications at Level 7 are awarded to learners who have demonstrated:

i the creation and interpretation of new knowledge, through original research or other advanced scholarship, of a quality to satisfy peer review, extend the forefront of the discipline, and merit publication;

ii a systematic acquisition and understanding of a substantial body of knowledge which is at the forefront of an academic discipline or area of professional practice;

iii the general ability to conceptualise, design and implement a project for the generation of new knowledge, applications or understanding at the forefront of the discipline, and to adjust the project design in the light of unforeseen problems;

iv a detailed understanding of applicable techniques for research and advanced academic enquiry.

Typically, holders of the qualification will be able to:

a make informed judgements on complex issues in specialist fields, often in the absence of complete data, and be able to communicate their ideas and conclusions clearly and effectively to specialist and non-specialist audiences;

b continue to undertake pure and/or applied research and development at an advanced level, contributing substantially to the development of new techniques, ideas, or approaches;

and will have:

c the qualities and transferable skills necessary for employment requiring the exercise of personal responsibility and largely autonomous initiative in complex and unpredictable situations, in professional or equivalent environments.

Qualifications at Level 7 are usually Doctoral degrees (for example, PhD).

CHECKLISTS FOR ACTION

These checklists are designed to help you think about what you need to do to design good programmes, and to put in place effective programme approval systems.

Checklist 1: Programme Design

- Have we set appropriate **learning outcomes**?
- Are they clear and understandable?
- Do they have regard to the Qualifications Framework?
- Have we included the skills students will need in employment?

- Have we provided the right **opportunities** for students to learn?
- How will our students learn
    - in practical classes?
    - in work placements?
    - by attending lectures?
    - in small groups such as seminars?
    - by using websites?
    - in the library?
    - using distance learning materials?
- How will we guide their private study?

- Have we pitched the **curriculum** at the right level?
- Does it fit together logically, so that students appreciate the importance of each part of it?
- Have we got the balance right
    - between theoretical and applied elements?
    - between breadth and depth?
    - between academic and professional development, and the enhancement of personal skills?
- Do we expect more of students as the programme goes on?

- Will our **teaching** challenge and inspire our students?
- Will it motivate them to study independently?
- Is it effective in helping students to learn?
- Is it varied enough to appeal to all students?
- Have we prepared the handouts and teachings aids we will need?

- Have we designed our **assessment** so that it measures whether students have learned what we intend them to learn?
- Have we chosen the right assessment methods?
- How do we know it is reliable?
- Have we guarded against cheating?
- Is it checked by a second examiner or verifier?

- Have we got the **resources** we need?
- Do we have the right people to teach the programme?

- Have we thought about their training and development?
- Are the rooms and workshops we need available when we need them?
- Have we made sure the right books are in the library?
- Have the students got access to IT facilities?

- How will we **support** the students in their learning?
- Will students have all the information they need?
- Have we given them a clear specification of what is involved in the programme?
- How will we check their progress, and provide any additional help that individuals might need?

Checklist 2: Programme Approval

THE PROGRAMME APPROVAL COMMITTEE

- Have we made clear which committee or other body is responsible for approving each of our programmes?
- Does the committee have an appropriate membership, in terms of representation of interests, and expertise?
- Do we have a list of outside subject experts we could call upon if we need them?
- Do we have a list of employers, or representatives of professional bodies, we could call upon if we need them?

PREPARING THE SUBMISSION FOR APPROVAL

- Are we clear about what must go into our submission for programme approval?
- Who is going to write each part of it?
- Who is going to edit or approve the final version?
- Have we set out a business case for running the programme, in terms of student demand and employment opportunities?
- Have we set out clear and appropriate learning outcomes?
- Have we set out how we will teach the programme, and the other learning opportunities we will make available to the students?
- Have we set out how we will assess the students?
- Have we shown that we have the human and physical resources we need?

MONITORING A PROGRAMME AT THE END OF EACH TERM OR SEMESTER

- What do we do to review how well the programme (or the elements of it that we ran this term/semester) worked?
- What worked well, and what could we improve?
- Do we know what the students thought about it?
- Have we got any feedback from employers who recruited our graduates?
- What have we learned from the examination or assessment results?
- What adjustments are we going to make to improve the programme next time it runs?

- Who will be responsible for making sure any changes we agree actually happen?

PREPARING FOR RE-APPROVAL OF A PROGRAMME

- When is the programme due for re-approval?
- Are we keeping all of the information we are gathering from our monitoring, to use in our submission?
- Do we need to gather any other information, for example about how successful our students are in finding jobs?
- Have we agreed who will write what, and who will edit/approve the final version?
- What discussions do we need to hold amongst ourselves to enable us to write a reflective self-evaluation?

IF A PROGRAMME IS FRANCHISED FROM A UNIVERSITY ELSEWHERE

- Are we clear about the division of responsibility between ourselves and our partner with respect to:
    - curriculum content?
    - setting and marking assessments?
    - teaching methods?
    - handling student complaints and appeals?
- What aspects of the programme can we alter:
    - unilaterally?
    - with the agreement of our partner?
    - not at all?
- Will our students have electronic access to:
    - tutorial staff at our partner institution?
    - databases maintained by our partner institution?
- What process does our partner require us to go through to approve the way in which we run the programme?
- Have we aligned our internal approval process with that of our partner, so as to avoid duplication?