THE TEF BY 2020?

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 - 1. This Paper considers what an effective and meaningful TEF might look like by 2020 if it is to achieve the hoped-for transformational impact on the quantum and quality of undergraduate teaching delivered within English universities and also to succeed in protecting the undergraduate student-consumer now incurring up to £50k of long-term debt. These are the twin ambitions of the Conservative Party 2015 Manifesto as developed further in the 2015 Green Paper on HE, the 2016 White Paper on HE, and the 2016 HE Bill.
 - 2. The Paper takes as its starting point the insightful economic analysis of the HE industry set out by MARTIN (2011), 'The College Cost Disease: Higher Cost and Lower Quality' (Edward Elgar). The essence of the economic transaction of concern for the TEF is that it occurs within a legal framework where the undergraduate degree is sold by the university (as a business) to the student-consumer.
 - 3. It is thus delivered (within English-law countries) under a B2C (business-to-consumer) contract-to-educate duly governed by consumer law within the wider context of contract law (in England the Consumer Rights Act 2015). Its key components are both the provision of teaching (backed up by adequate learning-support services) and also the process of assessment & examining; and these activities are to be supplied 'with reasonable skill and care' FARRINGTON & PALFREYMAN (2012,

- Oxford University Press), 'The Law of Higher Education', ch 12 on 'The Student-HEI Contract'.
- 4. This HE transaction is increasingly funded, as a global trend, by the student paying fees (HELLER & CALLENDER (editors), 2013 (Routledge), 'Student Financing of Higher Education: A comparative perspective' – in the comparative 25-volume 'International Studies in Higher Education' series edited by Palfreyman, Scott, Tapper). The government/taxpayer is in many OECD countries steadily retreating from providing HE as a free public good in the context of its costly massification over recent decades. The cost-burden is being progressively passed to the student (and his/her family) since the graduate is now seen as receiving a significant private benefit and hence as having personally to 'invest' financially in his/her university education. Essentially, countries have to face as a public policy issue whether to take the route of continuing the under-funding of an overcrowded and (perhaps over-)expanded, mass HE system as a free public good or share the cost burden of HE between the taxpayer and the student/family by injecting tuition fee income so as to better finance universities in the age of mass HE. This is not to say that there should not also be both market and regulatory pressures on HEPs to deliver undergraduate education more economically and efficiently, for HE to achieve much more effective cost-control so as to bring down the price of undergraduate degrees.
- 5. There is no credible rational basis for determining the ratio of public/social to private benefit arising from HE and hence no sophisticated policy mechanism nor any convenient algorithm for deciding on the exact proportions of the cost of

undergraduate teaching to be borne by the state through subsidies to universities as opposed to being carried by the student paying tuition fees. It is simply a matter of 'the politics of higher education' at any one time in any one nation and how the relative claims of HE are compared to other areas of public expenditure in the context of austerity for public spending. See, however, McMAHON (2009, The Johns Hopkins University Press), 'Higher Learning, Greater Good: The Private and Social Benefits of Higher Education', for an (the only?) attempt to allocate such private and public benefits - concluding that the fees:subsidy balance should be roughly 50:50 to reflect the estimated split of benefits (but, since the private investment is taken also to include the cost to the student of employment income foregone while in HE, the current level of tuition fees in most US states and certainly in England breaches McMahon's suggested c50% private input).

6. This process of change in the financing of HE through the introduction of and steady increasing of undergraduate tuition fees for a nation's citizens gives rise to the creation of a new and usually controversial market in the sale of undergraduate education to 'home' students (the English outlier example has been swift in moving from no fees in 1999 to £1000 pa for the early-2000s and then to £3000 a few years later, now £9000 since 2012 although in-state undergraduate tuition fees at, say, Berkeley are similar at c\$15k). Yet this is simply the creation of another market just like the one already long-operated enthusiastically and lucratively by the HE industry since the 1980s in selling undergraduate degree courses to international students paying very high tuition fees,

and also like the one by way of the sales from an extra and very profitable product-line more recently created through an explosion of postgraduate taught courses (notably in business schools). As this marketization (based on the charging of tuition fees) of the core undergraduate activity of universities develops 'the provider state' becomes 'the regulatory state' and now incurs a clear new moral if nit legal duty in terms of ensuring effective consumer protection for undergraduate students paying for what will probably be their third largest item of life-long expenditure after the buying of a house/flat and after the long-term commitment to a pension scheme - PALFREYMAN & TAPPER (2014). 'Reshaping the University: The Rise of the Regulated Market in Higher Education' (Oxford University Press). The state, rightly, wishes to encourage an effective market in undergraduate education but, as indeed for most markets, needs to offer some sort of regulation to protect against market failure - just as it has created market competition in the first place to protect against producer-capture of monolithic, moribund, incumbent, traditional HE providers.

7. How does the Regulatory State fulfil this duty of care to 16/17 year-olds in receipt of marketing hype from universities and then as undergraduates of 18/19 to 21/22 purchasing degree courses? The current mechanism is to rely on a costly quality & standards bureaucracy involving over several decades an avalanche of acronyms and a cascade of aborted agencies as differing levels of intervention are experimented with in terms of trusting (or not) the HE industry to play fair by the student, whether once fully-funded by a generous taxpayer or now paying £9000 pa tuition fees.

These mechanisms of 'the quality industry', of the 'teaching and learning' experts, of the 'student experience' pundits, seem largely everywhere to have failed to prevent a secular decline in the quantum and quality of undergraduate teaching in relation to exactly what happens at the chalk-face, in the lecture theatre and in the seminar room on a daily basis - LAND & GORDON (2013, Routledge). **Enhancing Quality in Higher Education:** International Perspectives' (again, within the 'International Studies' series as cited in para 4 above). Left to the vested interest, produceroriented, rent-seeking HE industry, the TEF will risk becoming just another forgotten acronym and failed agency, the same tired quality-assessment and quality-enhancement ideas being recycled and yet again failing to tackle the baked-in problem of the university-student transaction.

8. This innate problem, as analysed by MARTIN (op cit in para 2 above), is that undergraduate HE is an extreme example of 'an experience good' for these reasons: the (typically young and hence arguably vulnerable) student-purchaser is seriously underinformed because of significant 'information' asymmetry' in consumer knowledge about HE; he/she tends, therefore, to rely on high-price/fees hopefully signalling high-quality (the Chivas Regal effect); the university is tempted to engage in 'quality cheating' to protect its reputation, having no incentive because of severe unaddressed agency problems in the governance and management of universities to facilitate the student-consumer being better informed; the good is expensive and is purchased only once, and there is limited scope to transfer from one university to another if the student feels a wrong purchase-

- decision has been made; and the purchaser often is unable to assess the value of the degree until some years after purchase.
- 9. It is proposed that, rather than HEFCE approaching the TEF as yet another quality-bureaucracy exercise and experiment, the development of the TEF should be transferred as soon as possible to the new Office for Students (OfS) proposed in the 2016 HE Bill, which must then approach the evolution of the TEF in the way now here to be detailed building upon the marketization and consumerisation of HE, as well as on the recent greater involvement of the CMA and of the consumer-watchdog 'Which?' in its delivery; and, indeed, also building upon the recent attempts by HEFCE to oblige university governing bodies to take direct responsibility for teaching quality (see para 16 below).
- 10. One - An industry-wide standardised university-student contract-to-educate needs to be implemented. Most universities do not have an explicit contract and hence the student-consumer is spending £27-36k without the sort of contract that would be normal for, say, the buying of a new or used car, an expensive holiday, a home extension - and now even the pensions industry has begun to get its act together under pressure from sharpened financial services regulation. A specimen or model agreement/contract was offered in FARRINGTON & PALFREYMAN, op cit in para 3 above, at pp 443-447. Such a contract could be easily and speedily finalised by the UUK as the trade-body in consultation with key interested parties like the NUS and 'Which?' before being recognised by the CMA in the way that other bodies (eg the used-car dealers) have over recent decades moved to

standard contracts duly registered with the CMA's predecessor, the OFT (which will have vetted the contract for unfair terms, etc). Some of the few student-university contracts currently in use are egregiously one-sided and contain many of the unfair terms long-outlawed by the OFT – Farrington & Palfreyman, pp 400-420, and especially paras 12.112/113).

11. Two - This contract would incorporate as terms the representations made by the university to the applicant/student-consumer via the comparative data table/template suggested below. Under consumer protection law, the provision by the trader of material pieces of information to the potential consumer that are then reasonably relied upon by the consumer in reaching his/her decision to make the purchase of a service from that supplier become terms of the contract and the supplier is in breach if the service is not delivered in accordance with that specific information. Similarly, the failure to provide material information may be a misleading omission on the part of the trader if it should have realised the information would have been a key factor in the consumer deciding on the B2C transaction. This shift to a contractual approach to ensuring quality will, of course, be firmly resisted by universities as, for example, allegedly damaging some supposed precious relationship between university and student based on the medieval concept of membership within the stadium generale or on the basis that students are (in the trendy recent term) 'co-producers' of their academic progress so that, supposedly, the university can shift the burden to the consumer where it fails adequately to resource teaching. It is suggested that in the age of mass HE

amounting to tertiary education providing skills and competencies vocation degrees such a line of thinking is anachronistic, as if mass HE simply meant more Oxbridge liberal arts HE. The real reason for resistance is that universities are too well aware that they lack effective quality-control mechanisms because their middle-management is weak at departmental level whatever they may have at the top of the managerial hierarchy by way of PVCs pontificating on teaching quality and churning out policy papers for presentation to visiting quality-audit teams (and for 'gaming' these audit and assessment processes). Paradoxically, the shift here suggested, while appearing to increase pressure on the chalk-face academic, may, in fact, be welcomed by rank-and-file university lecturers as requiring corporatist management to properly resource undergraduate teaching in order to deliver over 3-4 years the package of teaching and assessment promised in the marketing and enshrined in the contract-to-educate.

12. Three - The suggested template of material comparative information is as in the attached VERY draft format. This template clearly needs to be carefully and extensively refined as work is done over the next year or two so as to properly explore the strengths and weaknesses of various sources of differing types of data and its use in many countries, as well as the studies now being undertaken in many countries to assess the problem of graduate over-production leading to graduate un/under-employment - eg the NSS here in the UK; Australia's QILT, CEQ, and SCEQ; America's BCSSE and NSSE, as well as the CLA; Japan's CSS; Canada's SoTL; OECD efforts to monitor graduate achievements and added-value such as the AHELO,

as well as the developing work of the 'Enhancing Higher Education System Performance' project currently underway; and the 'Which?' applicant/student website with the regular HEPI student t experience surveys (as cited in para 15 below) - also the growing number of valuable instances of best practice by way of localised pre-TEF initiatives at individual English universities, along with HEFCE's current 'learning gain' project. See LAND & GORDON, op cit in para 7 above, for the global comparative perspective.

- in its early years unavoidably to make do with whatever imperfect data is available (essentially the NSS and some HESA data). It also being the case that no perfect mechanism or utterly robust data source can ever be created there will always be a trade-off between the time and cost incurred in seeking perfection of metrics against progressing by 'satisficing' (and the incumbent HE industry usually resists progress by endlessly seeking perfection of metrics before allowing their use and then quibbling over the cost of seeking such data perfection!).
- 14. It will be appreciated that the information in the proposed template below is very largely about the quantum of teaching rather than focussing on its quality. This is partly because the teaching process is a black-box in terms of assessing quality, universities everywhere resisting all attempts to explore the concept of value-added. It is also partly because universities possess a unique Get-Out-Of-Gaol-Free card in being able to invoke 'academic judgement' when challenged on the alleged poor quality of teaching and the Court in all legal jurisdictions offers this legal immunity by not

second-guessing the proper exercise of academic judgement (FARRINGTON & PALFREYMAN, op cit in para 3 above, pp 360-366). The same concept of judicial deference to the proper exercise of academic judgement prevents under the Higher **Education Act 2004 the OIA taking up a student** complaint concerning academic judgement. Every other professional group has lost such privileged protection over the last few decades, and it is debateable whether the UK Supreme Court would strike down this judicial convention in the modern context of: students funding their own HE and increasingly paying high tuition fees to for-profit 'private' commercial HE providers; modern mass HE being in effect vocational tertiary education; and the traditional 'public' university anyway now behaving in a thoroughly business-like way. Given, however, this continued but anachronistic legal immunity, it is easier for the aggrieved student to show contractual breach and invoke consumer protection law where promises or representations have been made about concrete issues, about quantum rather than quality - for example, that there will be delivered X contact hours per week, there will be required Y hours of assessed work per term/semester, such work will be marked and feedback provided within Z days, seminar sizes will not exceed XX students.

15. It is thus asserted that, if the student had contractual certainty over these key aspects of the quantum of teaching and assessment (as delivered by appropriately qualified, trained, and managed academic staff), then much of the student dissatisfaction over seeming poor value-for-money of undergraduate education would be addressed – and, indirectly, the quality of undergraduate

teaching and learning would be monitored and improved in that universities would have less opportunity to hide the reality of their egregious neglect of the resourcing of teaching while diverting resources to the pursuit of the cash and kudos of research or to funding other non-teaching activities such as glitzy new buildings and 'administrative bloat'. The HEPI/HEA 'The 2016 Student Academic Experience Survey' reveals the dire state of affairs as duly ignored by a complacent HE industry: 'just 37%' of undergraduates feel they receive good vfm in return for £9k pa or £27-36k over a degree course, while 32% complain of 'poor/very poor' vfm (in 2012 when fees were at £3k the corresponding figures were 53% and 18%); and also 'the large majority of students still do not feel they receive enough information on how their fees are spent').

16. The enforcement of these contractual terms will be in the first instance by the university being required by the OfS to gather and make available the data, and then have a robust internal complaints process: failing that, by the individual student as now taking a complaint to the OIA (and/or to Trading Standards as for dodgy used-car dealers?). In addition, where there is a generalised complaint from a group or cohort of students concerning a degree course, there will be a procedure for it to be investigated by the OfS. The OfS will also exercise a random audit check on the accuracy of data being inserted into the course template by universities, and will require that university councils and boards of governors take steps to ensure the data populating the template is independently audited and that they, as the governors/directors, sign-off on the accuracy of the data just as they do the audited accounts – and, in fact, building upon the regime now put in place by HEFCE to achieve greater direct involvement in the quality-control of the institution's teaching. That said, it is stressed that success of the TEF will very largely always be dependent on the visible resolve of the OfS to deliver effective regulation on behalf of the student-consumer: the exact regulatory style of the OfS should, of course, itself be carefully thought-through in the context of the experience of how other such regulatory bodies approach their tasks and with reference to the growing academic literature on the 'psychology of regulation' just as much as on the longer researched and analysed 'jurisprudence of regulation'.

- **17.** This then is unashamedly a consumerist approach to quality issues in HE undergraduate teaching, and is promoted because the bureaucratic quality-audit/assessment approach favoured by the HE industry has signally failed to deliver. Thus, it might be hoped that England can avoid the decline of HE seen in the careful analysis of US HE set out in ARUM & ROKSA (2011, Chicago University Press), 'Academically Adrift: Limited Learning on College Campuses'). And also, hopefully, avoid the corrosive cynical mutuality of a cosy convenient conspiracy between academe and student by way of a contract of disengagement (the former gets on with research while neglecting teaching and the latter gets the degree credential with less effort in terms of work set and exams passed).
- 18. The chance of all the above coming to pass in the teeth of concerted opposition from the vested interest of the HE sector is not high!

(For the wider context of 'The University' see Palfreyman & Temple, 'The University – A Very Short Introduction' (Oxford University Press, forthcoming 2017), and especially the section within Further Reading on the future university.)

ATTACHMENT – very draft OfS guidance to HE applicants & students, and an initial version of a template for degree course comparative data & representations.

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ATTACHMENT

[NB EARLY/INITIAL DRAFT!]

Guidance from the Office for Students to potential university applicants and to university students

- 1. This guidance is issued by the Office for Students (OfS) to assist potential university applicants in comparing universities in general terms and also in comparing degree courses.
- 2. The decision about 'going to uni' is one of the most important you will ever make. It is certainly one of the most expensive perhaps the third most costly thing you will do in life beyond eventually buying a house/flat and after at some point committing to a pension scheme. This is because the tuition fees are almost always set at £9000 pa for three or sometimes four years, and also there will be living-costs on top which can take your debt burden to £40,000-50,000 by the time you graduate as well as the loss of earnings if otherwise you would have entered full-time employment rather than entering full-time higher education. You must think hard whether university is right for you compared to other options, including apprenticeships, a lower cost HE course delivered in an FE

- college, or working and studying part-time. This website gives you the details of the student loans arrangement that the Government offers to fund university tuition fees and part of your living-costs [LINK TO ???].
- 3. If you do decide that you want to go to university, you need to do extensive research on which university and what degree course. There are many published guides and several helpful websites many but not all of which are listed at [LINK TO ???]. These guides and websites, along with the marketing from individual universities and their open-day opportunities, will provide you with a wealth of information on other aspects of going to university (including whether the university itself can provide financial aid). This OfS guidance focuses solely on the most important consideration of all what are you paying for by way of teaching and will you feel you are getting value-for-money; the OfS does not attempt to guide you on such subjective matters as student lifestyle at university X or Y.
- 4. The OfS in seeking to ensure teaching excellence (its Teaching Excellence Framework, TEF) across English universities and also in fulfilling its duty by protecting the student as a consumer of higher education has required universities to provide data relating to teaching and, say, graduate employability/earnings in a standard way so that you can more easily compare institutions and courses. The data entered by a university in the form required by the OfS as in the template below will be found at its website, course by course.
- 5. The student at an English university enters into a contract-to-educate, this student-university contract being in a standard form for all universities as can be seen at [LINK TO BLANK CONTRACT]. Attached to the student's contract will be the data sheet in the form of the template referred to in paragraph 4 above, and the representations or promises made by the university at the time the student applied to the university and was accepted will become contractual terms binding upon the university unless the university has notified the student in

- writing of any changes and the student has agreed to accept them at the time of starting the degree course or subsequently during the course.
- 6. You need to be very clear that the contract imposes obligations on you just as upon the university. The university must provide teaching and assessment/examining with reasonable skill and care under consumer protection laws, as well as the various specific elements set out in the template while also ensuring that the data it has provided to help you make your decision in applying to it is accurate and in no way misleading, including the university not accidentally but misleadingly omitting to inform you of important information. You in turn must pay the tuition fees and also be diligent in your studying, which for a full-time student should involve weekly effort in term-time amounting to a full-time job of 35-40 hours per week. These hours will be partly attending lectures and seminars, and also laboratory sessions in some courses these are 'contact hours' in the comparative data. But in addition you will study on your own preparing for seminars and doing follow-up reading after lectures as well as writing assignments and revising for tests/exams - or sometimes as a group of students working on a collective project. The process of 'higher' education crucially requires this self-directed study and degree level education can never be fully achieved simply by only attending the set lectures and seminars (and then perhaps being lucky in tackling assignments and passing exams!) – attending a university is not like just continuing to go to school!
- 7. The template for each degree course looks like the specimen set out below and the university is responsible for completing it with accurate data. You should, therefore, be able to compare what is on offer in the same or similar degree courses at the universities you are focussing on as the ones likely to be listed on your UCAS form [LINK TO THE UCAS SITE].

- 8. This data then becomes part of your contract with the university and, if you feel the university is failing to provide that which was promised, you should take the matter up through its complaints process, probably via an informal mechanism initially and perhaps progressing to a formal complaint (your student-university contract referred to in para 5 above will spell out the complaints process). If that internal procedure does not rectify matters, the university is required to notify you of the complaints investigation and adjudication operated by the Office of the Independent Adjudicator for HE (the OIA): [LINK TO THE OIA SITE]. Where there is a group or cohort of students with a similar complaint about, say, a degree course not delivering the teaching pledged, there is a mechanism for the OfS to investigate when the collective of aggrieved students contact it, having first exhausted any internal processes such as student representation on course committees: [LINK TO OfS SITE].
- 9. The OfS [LINK TO WEBSITE] wishes you well in considering university as an option and in applying if you decide to do so. Equally, it offers best wishes in getting any entry grades required and then in not only benefiting intellectually and academically, but also more widely, from fully and conscientiously participating in your university years.

THE SPECIMEN TEACHING DATA TEMPLATE [NB EARLY/INITIAL DRAFT!]

UNIVERSITY - XXXXXXXXX

UNDERGRADUATE DEGREE COURSE – XXXXXXXXX (UCAS NUMBER XXXXXX)

THIS DATA IS VALID ONLY FOR APPLICATION YEAR 20XX/YY AND THEN FOR INCLUSION IN THE ENGLISH UNIVERSITIES STANDARD STUDENT-UNIVERSITY UNDERGRADUATE CONTRACT FOR ADMISSION ONLY IN YEAR 20YY/ZZ. THIS DATA TEMPLATE IS

REVISED ANNUALLY AND UPDATED ON XX XXXXX EACH YEAR: please ensure you are referring to the latest valid version.

- 1. Tuition Fees for Year 20YY/ZZ are expected to be £9XXX (they are currently for this academic year, 20ZZ/ZZ, at £9YYY.
- 2. This degree course is for [X] years and each year tuition fee increases are likely to be in line with inflation (CPI) as currently predicted at, say, 1-3% but will not exceed it.
- 3. The University has a *teaching staff to undergraduate students* ratio of X:Y. The ratio for this degree course is X:Y.
- 4. The contact hours for this degree course are XX per week for YY weeks of Year 1, for YY weeks of Year 2, for YY weeks of Year 3 [ADD RE YEAR 4 IF APPROP]. The annual number of weeks is spread across the three terms [or two semesters] as follows: [to be detailed out so as to flush out those courses where almost nothing happens in Term 3!].
- 5. Within this overall teaching provision during the degree course, the percentage of lectures and seminars given by full-time permanent academic staff will be in the range XX-YY%. The rest may be given by fixed-term, casually-employed teaching staff or by graduate students employed by-the-hour to lead seminars.
- 6. The overall percentage of teaching staff at the university with formal *teaching qualifications* is XX% and for this degree course it is YY%.
- 7. The maximum size of any seminar within this degree course will be XX students.
- 8. There will be X formal marked assignments per module or sub-course within the degree course, amounting usually to Y assignments per term [or semester].
- 9. These assignments will be marked and written feedback provided within XX working days (Monday to Friday) of the deadline for being handed in.
- 10. Each student is guaranteed a face-to-face individual feedback session of XX minutes if requested with the marker

for his/her assignment, such meetings to be held within XX days of marks and written feedback being provided.

- 11. In addition to formal assignments counting towards assessment for the degree result, there will be the opportunity for students to submit X practice assignments per module or sub-course, which will be marked and on which written feedback will be given within XX days of submission, but where the mark will not be counted towards the degree performance.
- 12. Every student will be given a XX minute *individual review* session once per term [semester] with the academic allocated in a given year to discuss his/her study issues, overall academic performance, satisfaction with the course, and other broad academic matters.
- 13. Funding of teaching The university deploys £XXXX of every undergraduate annual fee of £9YYY or ZZ% into the direct delivery of undergraduate teaching and assessment/examining (as calculated using a standard methodology approved by the OfS). For this course's fee income the percentage financing the direct cost of teaching on the course is XX%.
- 14. The university provides this kind of support for students seeking *internships* that may enhance employability upon graduation [LINK]. On this specific degree course internships are supported by [LINK].
- 15. The university's overall level of student satisfaction in the *National Student Satisfaction Survey* (NSS) is shown at: [LINK]. For this degree course NSS details are at: [LINK].
- 16. The university has a *drop-out rate* of XX% overall in terms of students who start but do not complete their degree courses. For this degree course it is YY%.
- 17. The *entry grades* for students overall at the university are XYZ in terms of A-level scores or XXX tariff points. For this degree course they are YYY or ZZZ.
- 18. The employment data for the university's graduates is to be found at [LINK] and specifically for this degree course at [LINK].

- 19. The earnings data for the university's graduates overall is at [LINK] and in relation to graduates from this degree course at [LINK].
- 20. In terms of widening-participation and access, the university recruits this percentage of its students from socioeconomic groups X-Y: XX%; for this degree course the figure is YY%. The percentage of the university's students where neither parent has benefited from higher education is ZZ%; on this degree course it is XX%.
- 21. Long-term value The response from graduates of the university five and ten years after graduation concerning their perception of the 'value' of their degree and experience of higher education is detailed at [LINK] in terms of their careers, their sense of 'life-satisfaction' or 'well-being', their civic engagement, etc. For this degree course the data is at [LINK].
- 22. Teaching style, use of digital-learning such as MOOCs, etc The course directors' comments on its teaching style and methods, on its potential use of digital-learning such as MOOCs, and on student team-work within the teaching and learning processes are set out at [LINK].
- 23. External Examiners Reports Degree courses have external examiners, usually academic staff from other universities, who participate in the examination and assessment process, and who provide an annual report to the University. The External Examiner Reports for the past three academic years are to be found at [LINK].
- 24. Learning-support services The University's description is at [LINK] in terms of its resourcing of the learning-support services that are an important part of the overall 'academic experience': such services include library facilities, support for internship and careers, academic and pastoral counselling.

[NB Clearly other/different data could be used and obviously the order in which it is presented, as well as the lay-out, needs to be developed from this VERY crude first draft/attempt!]