Review of the UK PSF for Higher Education
Response from the Heads of Educational Development Group
January 2011

The **Heads of Educational Development Group** (http://www.hedg.ac.uk) represents senior institutional leaders with a direct responsibility for learning and teaching enhancement at over 110 Higher Education Institutions in the UK. HEDG members have in common their responsibility for translating institutional strategy and vision into academic practice. This may be through academic staff development, educational innovation projects, Postgraduate programmes for new or experienced staff, curriculum development and research projects, or through their contributions to committees, advice and guidance work, regional networks and through many other routes. At the same time, HEDG members tend to be those people on institutional boards and committees who bring the voice of academic practice to the consideration of strategy makers and policy setters. Heads of Educational Development have the additional responsibility of working with their own team of staff, as well as keeping abreast of national/international developments and initiatives to support their institutions and colleagues. Many of us, but not all, will also have a brief for HE research to help inform our institutions.

The HEDG consultation response is set in the following context:

- HEDG represents Heads of Educational Development in UK HEIs and, as such, reflects the diversity of the sector, including diversity of missions of HEIs and differing UK funding regimes
- the HEDG response reflects HEDG agreement on philosophy and overall approach rather than all the detail
- the HEDG response acknowledges where views were not unanimous and notes that Member institutions will be making their own detailed responses.

Consultation question [1]

Do you consider that the original aims of the UKPSF remain appropriate?

Generally the aims are still appropriate and are broad enough to reflect the needs of most HEIs. It is interesting to note that there continues to be no specific reference to defining standards despite the title referring to a 'standards framework'. Is this an opportunity to address this anomaly in the aims?   There is nothing in the aims that highlights to staff that the framework supports/accredits awards that align with a national standard for higher education and which are portable within the UK and , potentially, internationally. Increasingly staff are working on an international stage and require accreditation which supports their personal mobility.

The aims were written in a context where the HEA had focused its own strategy on student learning; given the recent HEA review of its own role to **support teachers**, the use of 'teaching' in the aims would be sensible, perhaps in the third bullet point. Similarly, if the wider notion of **academic practice** is to be addressed by the framework (as is suggested in Qu. 3) then this might be clarified in the aims. Finally, the stated aim to foster 'creativity and innovation' is not reflected clearly in the revised framework (this was also the case with the original framework but if this is to remain a high profile aim it might usefully be reflected in the structures).

Consultation question [2]

a. Comment is invited on both the content and structure of the revised UK Professional Standards Framework (Standard Descriptors) in Appendix 1.

Institutions are keen not to completely overturn the existing framework which is embedded in accredited courses they offer. This has been achieved in the proposals. However, the move from three to four levels of standard descriptor and the clear link between each of these and a Fellowship award is the most significant change.

While HEDG welcome an elaboration of detail to include description of typical role/career stages and typical activities, it is important that the Framework does not make too close an alignment assumption between specific job roles/institutional structures and the 4 levels, or assumptions that career progression happens in a linear way. Enhanced clarity between different levels of the PSF and an individual's career development should, though, help staff to make decisions about the most appropriate initial or continuing professional development focus for them. It should

also facilitate the development of institutional CPD frameworks to align with the National Standards.

There are several inconsistencies between the descriptions at different levels, which will presumably get sorted out in re-drafting. The new descriptor for Associate Fellow reference to 'subject and subject material' implies that associate fellows will be involved in teaching or research, whereas staff with other roles (eg librarian or multimedia developer) can be supporting learning in a pedagogically informed and sound way without having disciplinary subject expertise in the area in which students are studying. The Fellowship role is described as including successful completion of a PGCHE. Is this really a role? Perhaps the other descriptors (Associate) also need to suggest a level of qualification which would typically be attached to them. It would be useful to have more guidance on what is meant by 'equivalent qualification' to the PGCertHE on page 19. Standard Descriptor 4 is expressed differently to the other levels, as a role descriptor rather than a standards statement. SD4 should not be limited to a narrow range of job roles.

The new framework continues to assume that at level one it is appropriate to chose depth over breadth, while at level three breadth is considered more significant than depth. In defining standards it is more normal to identify **level of competence** at each stage rather than 'coverage'. This could usefully be articulated in the revised framework, without undermining the continuity required by accredited course providers, by allowing some flexibility in what is selected by the individual to exemplify competence.

By level three/four, it is reasonable to expect individuals to be specializing, and pursuing particular interests depending on their context, so at this level it might be sensible to ask for "at least two" areas of activity (rather than all five), but obviously at greater depth than level one. The description for level 3 should include: demonstrating advanced (more than 'appropriate') knowledge; implementing strategy (prompting, managing and supporting change); engagement with regional and national networks (academic, business or community); leadership in the professional development of others; commitment to, and advocacy of, the professional values. This would overcome the issue of identifying activities for level 3/4.

In summary, we would highlight the importance of building on the strengths of the original framework and of being clear about how the new SD 3 and SD4 might be achieved and what processes could be used to measure/accredit that achievement. More clarity is needed on how SD4 links to the other three levels.

b. Comment is invited on the content and structure of the table in Appendix 2, which provides further underpinning detail regarding the Areas of Activity, Core Knowledge and Professional Values.

Once again continuity with the existing framework (for areas of activity and core knowledge) is appropriate and desirable and the addition of indicative evidence is useful.

The original standards provided very little detail to accrediting HEIs who therefore, developed progressive marking criteria. The new guidelines provide much more indicative detail but this is not clearly developmental; progression from one level to the next is not apparent. If this is purposeful it needs to be explained somewhere in the standards; if it is not, then some progression should be built into the framework. The values have changed significantly in the new version and this may be a challenge for those running accredited courses where the values underpin assignments very heavily. It is not clear why these changes have come about. In particular a commitment to CPD and evaluation (or continuous improvement) seems vital and perhaps the key underpinning principle for the framework. Although this appears in three of the four descriptors (but not in the Associate Fellow descriptor) it seems desirable to include it as a value in addition. It is not clear why sustainability/ global citizenship has been added as a value. This seems to be a specific example of a more general statement (which is well covered by C3) and suggests that there is a national 'requirement' in this area.

The context could be emphasized more strongly at the head of the document. For example a statement could be made on developing and applying pedagogy at a discipline level where this is appropriate**.** The header of the middle column (table A and B) ought to be indicative, not prescriptive, i.e. 'could/might' rather than 'should'.

c. Comment is also invited on the shorter and refocused title of the Framework.

HEDG would support the notion of a shorter and refocused title but only if it accurately reflects the nature of the standards. Unless and until there is a

comprehensive set of standards in place covering all aspects of professional life in Higher Education, the title must make explicit their focus on teaching and learning.

Consultation question [3]
Comment is invited on the way in which the Framework addresses the importance of recognising the integrated nature of academic roles and responsibilities, whilst maintaining a strong and central role for teaching and learning within the UKPSF.

The Framework's recognition of other aspects of academic activity is a step forward; it reflects the reality of professional roles and many HEIs have already moved in that direction in their accredited frameworks. However, if an academic practice approach is to be encouraged then further development work is needed on what this encompasses. An academic practice approach would require that attention be paid to the development of research expertise as such and also how teaching might feed into research, as well as pedagogic research and ways in which disciplinary research inform teaching. In addition, with respect to the treatment of leadership, it would be far more helpful if the Framework reflected contemporary views about the need for distributed leadership in teaching, rather than as something that only senior leaders do. Leadership ought to be an aspect of at least standard descriptors 2-4. Two academic practice activities (leadership/ KTP) are concentrated on Level 3 and 4, but newer academics may also have a focus on KTP / third stream activity and therefore this should be included in Level 2.

To be inclusive there is a need to focus on learning support functions throughout; the level 2 description, for example, disadvantages anyone not in a standard lecturer role. The UKPSF should encompass those who support learning at all the levels.

Consultation question [4]
Comment is invited on the proposed approach to initial training and professional development for external examining as part of the UKPSF.

A minor element for induction purposes dealing with the external examination system as one aspect of the Quality Assurance process is appropriate particularly for International staff at level 1/2. Proposals in the consultation take training in this area too far at a time when it is probably not needed. They should be left as indicative activities only. This type of training should be delivered by HEIs for their own examiners and/or at a national level to ensure consistency and quality. There is a wider question about how external examining will be assured; who will be judging the

performance of external examiners and deciding whether it is "effective"? This is probably beyond the scope of the UKPSF. Training is best offered when it is needed and it is probably the case that the majority of probationary academic staff will not be external examiners.

Consultation question [5]
Comment is invited on the practical implications of introducing a formal requirement for subject/disciplinary based support for
a. mentoring
This is already fairly common practice across the sector and should be both desirable and practical in most contexts, but it should not be made a formal requirement. If it is required it may present difficulties in terms of the number of suitably qualified mentors being available in the early period of adopting this position.

b. teaching observations
This is also already fairly common practice on a lot of PG Certs where the focus is formative and peer-enhancement led. Good discipline based support is an excellent principle. Most institutions would consider it reasonable to make peer review (but not necessarily an observation which limits the types of activities that are reviewed) a formal requirement for accreditation purposes. Staff doing the reviewing require training to ensure consistency of expectations. Initially this may present difficulties in terms of the number of suitably qualified individuals being available.

However, it is noted that the consultation refers to **all probationary staff** not just staff on PG Cert programmes. A judgmental probation-related observation is significantly different from a developmental PG Cert review and it would not be helpful to mix the two up.

c. discipline-focused module (or equivalent)
We agree that training programmes and all CPD needs to be addressed in a disciplinary context; focus and reflection on the individual's discipline should be expected within a PG Cert course and assessment needs to reflect this too. This focus should permeate all aspects of the course and be incorporated into course design/support/mentoring mechanisms. This happens commonly in existing programmes. Therefore, we welcome this proposal provided it remains flexible and does not lead to an obligatory formal credit-bearing module; prescription is not welcome. The judgement as to whether discipline specificity requires a single

module or a more integrative approach should be a judgement for institutions to make, relevant to their curricular and pedagogic context.

In addition there are significant resource problems associated with this proposal which are compounded by fluctuations in potential cohort numbers. Inviting contributions on a large scale from academics based in the disciplines is likely to prove unpopular and also to lead to quality assurance issues.

Consultation question [6]
Comment is invited on how far the guidance provided in the Framework is appropriate with regard to new and emerging technologies.
The guidance in the Framework is extremely limited and seems to be fairly general (depending on what is meant by engagement, and the level of engagement expected) but that is probably all it could or should be, as this is an unpredictable and rapidly, ever changing landscape, and appropriateness will be hugely context dependant. There should perhaps be additional reference to the need to encourage a critical debate about, and evaluation of, the use of different learning technologies In teaching and learning. The use of technology in support of disability might also be included.

Consultation question [7]
Comment is invited on the location of the sustainability focus within 'global citizenship', one of the Framework's professional values.
The terminology is confusing as the phrase 'sustainable curriculum' could be taken to imply issues of costing, demand, marketability, longevity, etc. It appears to mean a commitment to the principles of sustainability (green and ethical issues taught through HE) and the concept of global citizenship in Higher Education'. Can the meaning be clarified?
Having said this it is not clear why these themes have been identified from amongst many which would be a valid focus for CPD activity (e.g. employability). Might it be better to leave these out of a high level framework such as this one and allow the providers in the HEIs to develop courses as appropriate to their contexts which address these issues?

Consultation question [8]

Comment is invited on the proposals under the section headed 'qualified to teach' with particular reference to their feasibility within, for example, the current economic and higher education policy climate.

The formal position stated in F1 to F3 reflects existing policy at many, if not most, of our HEIs. It is important, though, that institutions should have the freedom to gain accreditation, if they want it, from other bodies than the HEA. Whilst setting professional standards is within the remit and responsibility of the HEA, it is felt that it is not the role of the HEA to prescribe to institutions how they prepare participants to achieve those standards.

The fourth proposal regarding teaching observations reads as linking in a simplistic way teaching **capability** to an assessment made of a particular 'performance'.

Consultation question [9]

a. Comment is invited on the potential use of anonymised information about higher education teaching staff qualifications and fellowships.

In principle we would welcome this proposal as a way of increasing the numbers of qualified staff with accredited status. It aligns with the policies in many HEIs.

b. Are there any potential benefits and/or drawbacks you that would identify?

The primary benefit relates to the raising of the profile of teaching as the primary activity in Universities. However, there are practical issues which need to be addressed. In particular, more accurate and timely data will need to be available and the HEA and HEIs will need to share data without breeching data protection laws (for example when staff move institutions). The process of accreditation requires resource (in the HEI and the HEA) and the speed of accrediting programmes and recognising staff will be a significant issue. There needs to be careful control over the use of the data in order that accreditation does not simply become a tick box approach in the service of league tables. HEIs would definitely look to the HEA to collate the data in the first instance.

One potential drawback is that this sector-wide profile would not include recognition of staff undertaking non-Academy accredited development activities and may

discourage institutions from supporting staff in attending non-credit bearing professional development activities, but this could be addressed by institutions publishing more detailed and comprehensive data regarding the broad range of CPD undertaken by their staff. Arguably the proposal here is facilitating a restrictive practice, at the expense of institutional autonomy, in requiring all universities to deal with the HEA in order to maintain the numbers of trained staff that will be published.

Consultation question [10]
Comment is invited on the potential for greater collaboration with regard to professional standards related to teaching, between the Higher Education Academy and other professional bodies/associations.
We would strongly support greater collaboration with and calibration of standards between the UKPSF and relevant professional bodies/ associations and links with other providers of CPD . The work currently being undertaken in conjunction with SEDA and the Vitae Researcher Development Framework are examples of how important this is. The only concern is that there are some professional frameworks which are highly prescriptive and the UKPSF should not have to be compromised in order to align with these.

Overlap and integration with regulations and requirements in the FE sector needs to be considered. The expectation in the HE in FE sector is that staff should have membership of the Institute for Learning (the professional voice of the FE sector), yet have had little support from line managers to engage with the PSF.
Given that the UKPSF is promoted abroad there is very little to suggest this and given the mobility of academics it might be sensible to point at this somewhere in the framework. This would have implications for collaboration.

Consultation question [11]
Comment is invited on the revisions to the Framework with respect to the Standard Descriptors, including the introduction of Standard Descriptor 4: Principal Fellowship.
There was broad agreement, if not complete unanimity, in welcoming the inclusion of Standard Descriptor 4 (Principal Fellow). If this is successful it will give status to the Framework and act as a lever for engaging very senior managers in promoting and valuing L&T.

Consultation question [12]

Comment is invited in relation to:

a. The appropriateness of the potential criteria/indicators outlined in Appendix 4 and the degree to which these reflect the focus adopted within individual institutions.

b. The appropriateness of the likely sources of evidence outlined in Appendix 4 and their potential value within individual institutions.

c. Possible approaches to 'populating' the various career stages (ie. how far any of the evidence sources might be seen within individual institutions as 'essential' or 'desirable' for particular career points).

The inclusion of this framework for HEIs to develop in their own interests is a very good idea. If we assume that there will not be any need to develop compatible frameworks this simply provides HEIs with a valuable reference point for developing institutional frameworks. The HEA might lead on a dialogue about this with its network of PVC/DVCs and should communicate with HR Departments in disseminating this framework.

If there is a perceived need for a more consistent approach across the UK some consistency of approach would be needed incorporating a 'core' of 'essential' criteria and evidence. There were, though, some strong views expressed that promotion criteria should be a matter for institutions to determine.