

Compensation and Condonement Review Chair's summary of decisions

About the Compensation and Condonement Working Group

The Engineering Council planned for a review of its 'Compensation and Condonement Policy' (which replaced previous guidance) to commence a full academic year following publication. It was not expected that a review would necessarily result in change, but would provide an opportunity to reflect on whether there was any evidence of a need for change.

A review working group comprised six working engineering academics (one of who was the Chair), one retired academic, one professional engineering institution (PEI) staff member with extensive experience of accreditation visits and the Engineering Council Education and Skills Manager.

Executive summary

The working group received individual items of feedback directly from interest groups and through direct communications which had been received by the Engineering Council. All items of concern were considered, taking into account whether the feedback contained new objective evidence that had not been considered by the original review. The working group did not receive strong evidence of a need to change policy at this point in time and did not feel it appropriate to recommend to the Registration Standards Committee (RSC) that major changes should be actioned.

However, it was agreed that in some areas the Guidance Notes and Policy wording could be improved and in the accompanying documentation the working group are presenting specific recommendations. The working group also noted that in some cases negative feedback may have been due to a misunderstanding about the reasons for the change in policy. It was acknowledged that the policy would result in administrative and pedagogic work for some Higher Education Institutions (HEIs) prior to introduction. Since HEIs do not follow common practices in this area, some will require more substantial changes to satisfy the policy. Overall, the working group concluded that the original policy had struck a fair balance between the competing needs for consistent accreditation standards and the interests of students to progress in their degree programmes.

Key themes of feedback to RSC from the Working Group

The group carefully considered all the items of feedback that were received through the various channels. In the following sections, the feedback has been categorised and summarised, along with the responses from the working group.

Pedagogic concerns and concerns relating to the impact on course design

The working group heard concerns regarding:

- The potential for a reduction in the number of students who meet annual progression thresholds and are eligible for degree awards.
- Additional need for resit examinations where standards on modules were not met at first attempt. This appeared to be a particular concern where there was not an existing culture/mechanism in the HEIs to allow resit opportunities.

- A reduction in 'flexibility' in degree programmes and the presumption that the new compensation limits restricted the freedom of HEIs to produce innovative programmes.

The group responded in the following way:

- The practice of limiting condonement/compensation is common among Professional, Statutory and Regulatory Bodies (PSRBs) accrediting degree programmes. This ensures that graduates have been assessed on and demonstrably meet the learning outcomes.
- The Engineering Council is reasonable in its role as a PSRB in setting outcomes standards for programmes that HEIs seek accreditation for. The original working group had considered the amount of compensation that should be allowed in an engineering degree.
- Not meeting the Engineering Council policy did not prevent the HEI from awarding a non-accredited engineering degree with a different title.
- The policy does still allow a limited amount of compensation, which is standardised across all PEIs and accredited HEIs. This brings benefits in terms of consistency of practice to HEIs, PEIs and accreditation panels.
- The rules strike a balance between the need to set universal minimum standards, while still allowing some flexibility to allow students who very nearly meet the threshold standards in some elements to continue on their degree programme or to graduate.
- Requiring students to repeat failed assessments to meet the threshold standard is not an unreasonable request from a PSRB. If this is not done, then no evidence exists that the student meets the pass standard for a course element. While failure of any module in an accredited degree is undesirable, permitting a limited amount of marginal failure is a long-standing Engineering Council policy.
- To meet the needs of the profession, engineering accreditation already covers a vast diversity of degrees. The Accreditation of Higher Education Programmes (AHEP) is written in such a way that it permits degrees with very differing characteristics to be included, ranging from highly technical specialist degrees to broad management-heavy degrees. The requirement to pass most modules offers providers the opportunity to have these different types of degree, while still ensuring students meet the pass threshold in all the core areas required by professional engineers.

Overall, the benefits of consistency of practice appeared to outweigh individual concerns raised in this area. The comments received by the working group were largely anonymised as they had come via a PEI or through a body such as the Engineering Professors' Council (EPC). Many of the comments raising issues in this area appeared specific to an individual HEI's policy.

To act as a counterpoint, it is clear from PEI feedback based on accreditation visits that many HEIs already comply with the Engineering Council policy. Many other HEIs have presented firm plans to implement the policy by the 2022 intake, based on planning which began in 2018 when the policy change was announced. Notwithstanding this, the Engineering Council and PEIs may need to be sensitive to concerns of specific HEIs where their current (pre 2022) policy is substantially different from that which is being implemented in 2022.

Management and administration concerns

The working group were aware that some HEIs were concerned in the following areas:

- The ability of local IT systems to handle credit accumulation where present practice is to only deal with compensation on a year-by-year basis and not to calculate the accrual of credit from year-to-year. Many HEIs work on annual progression targets which, once met, qualify students to progress to the next stage of their degree or to graduate. This is potentially a practical issue for HEIs to overcome since examination board paperwork is usually produced by an institution-wide IT system. It means that implementing the policy is likely to mean additional workload for administrative staff and cost.
- Concern that the allowed compensation credit was not compatible with module sizes at the HEI, for example where 30 credits was the base for measurement and a maximum of 20 credits compensation was permitted. There was a perception that some universities may benefit from the limits due to their standard credit size and a feeling expressed that the limits placed were rather arbitrary.
- Incompatibility with University general regulations. Perceived unfairness in imposing different compensation/condonement rules on engineers, compared to other students.
- The necessity of introducing unaccredited pathways for students who do not meet Engineering Council rules but meet local rules. This was considered undesirable by some respondents.

The working group responded in the following way:

- It was agreed that administration systems/practices would need changes in many cases and that it was inconvenient and potentially introduced additional costs, particularly in the short term. Longer term, IT systems could be updated to include the capability to accrue credit in the way required.
- There are benefits in applying the same policy across all engineering degrees since there were economies of scale when updating systems. It also meant that degrees accredited by different PEIs were guaranteed to meet the same standards, avoiding the need to apply different rules according to different accreditation panel decisions.
- PSRB exceptions to general regulations were already established in most Universities. QAA and other bodies accepted the principle that PSRBs may have different requirements from University general regulations.
- The principle of passing credit and meeting threshold standards is standard across most HEIs. The Engineering Council is not imposing a new paradigm, just placing more specific limits on the amount of marginally failed credit. The practice of condonement (allowing a module to be failed outright) is not approved of by the Engineering Council because there are HEIs and degrees where AHEP learning outcomes are assessed in only a few places (or perhaps only once). The concept of allowing students to still pass with failed credit is also not the norm internationally.
- The working group noted that some universities did not award credit to modules that are marginally failed (and then compensated). This was felt to be a technicality. The most important issue was whether components of the degree programme that were considered as separate items by an examination board are passed or marginally failed.
- The 'new' arrangements are not completely new, as imposing limits on compensation and condonement is already the policy of some PEIs. The Engineering Council has provided guidance on this issue for many years.
- The group felt that the logistics involved in administering an identical degree programme with a different title (but without PSRB regulation and under university

general regulations) was not insurmountable, even though there was agreement in the working group that it was inconvenient.

Working group members, who were primarily practicing academics, were familiar with and sensitive to the issues surrounding administering degrees. Much of the feedback received was of genuine concern, and it was understandable if there had been delays in addressing some of the changes due to the pandemic. Nevertheless, the Autumn 2022 implementation date meant that the first examination boards likely to be impacted by the changes were due to be held in the summer of 2023 which left a substantial period before the details had to be dealt with. It was felt that notwithstanding any challenges due to the pandemic, there had still been adequate time to make the changes required. There was no new evidence that the compensation limits were inappropriate.

Diversity, inclusion, impact on students

The working group discussed the following concerns:

- That reducing compensation and condonement may affect some groups disproportionately, specifically disadvantaged students.
- Concerns over students with protected characteristics being unfairly and (potentially unlawfully) discriminated against.

The working group considered these concerns very carefully and concluded that whilst it was very important that they should be monitored, they were not directly associated with the Engineering Council policy because:

- The working group was aware of universities where the new Engineering Council rules are already being complied with, which already accept and graduate a very wide diversity of students. It is the duty of the HEI to meet the needs of their intake and to teach students so that they can reach the pass threshold and beyond.
- If the Engineering Council accepted this argument then it set a bad precedent for improvements in HEIs, since the objective for HEIs is for disadvantaged students to achieve at the same level as non-disadvantaged students.
- In the UK and many other countries, students with protected characteristics must receive reasonable adjustments from the HEI to allow them to access the assessments to 'level the playing field' and ensure that they are not disadvantaged.
- It was not felt to be good practice to make use of condonement and compensation in the way implied to graduate students since the student should in UK law have the same access to the assessments as students without protected characteristics.
- As a PSRB it was a duty of the Engineering Council to set minimum standards for the degrees it accredits and although the issues raised should not be dismissed, it was the HEI's responsibility to address them. The Engineering Council may wish to consider whether it can do more to support HEIs in this area.

The working group did not believe that the feedback received had presented any new evidence to drive an immediate change of policy. The working group were not aware of any detailed impact assessments in this area that took place before introducing the policy so the Engineering Council may wish to consider if this is necessary.

General observations

The working group made the following general observations about the policy:

- The changes to existing policy were essential to meet international obligations and to improve consistency across PEIs. It was not clear that this had been understood by all of those giving feedback.
- The positive impact of the changes had not always been appreciated by HEIs, with feedback mainly drawing on potential negative implications of the changes.
- The limits set on compensation and condonement within the original policy were reasonable, even though they created some new problems which had to be addressed by HEIs.
- It was felt that the alternative would have been to move to a regime where no compensation or condonement was permitted, which is the situation in our international counterparts.
- The new limits may have the desirable effect, from an accreditation perspective, of focusing HEIs on assessment of threshold standards within parts of their engineering degree programmes. By increasing the focus of HEIs on students meeting the threshold standards it increases the adherence to the minimum standards in AHEP and reduces the risk that students graduate without meeting all of the Learning Outcomes.
- It was recognised that the policy would influence degree programmes and initially would cause additional work for HEIs. However, in the long term it would be beneficial, and would have a positive effect of standardising the treatment of engineers across a whole HEI.
- The policy was announced in November 2018. Working group members had been on numerous accreditation visits since the policy was announced and indicated that this had been generally understood and work was in progress within HEIs to make the changes by the deadline of October 2022 intake.
- Since HEIs are already known to be making changes for the scheduled deadline following the announcement in 2018, withdrawing or making substantial changes to the policy now would be unfair to them. Making substantial changes at this point in time had the potential to cause reputational damage to the Engineering Council, particularly among HEIs that had worked to comply with the policy.

Conclusions

The working group weighed up the arguments carefully and concluded that it was, on balance, appropriate for the Engineering Council to continue with the introduction of the policy by the planned date of October 2022.

There were some areas where it was agreed that wording changes to the Policy and the Guidance Note would be helpful. The main areas of clarification were:

- Changing the Policy wording regarding the definition of compensation and condonement to include the clarifications provided in the 2019 Guidance Note.
- Clarifying that it is the combined credit weighting of passed or marginally failed modules that is important, rather than focusing on the administrative award of credit.
- Including an justification of why the Policy is needed within the Guidance Note.
- Changes to the wording of the Guidance Note to provide clarification and to remove ambiguity.
- Addition of a new example which makes reference to the credit framework in Scotland.