



## Quality Assurance Code of Practice

### External Examining (Apprenticeship Courses)

Queries/First point of contact - Academic Registry

1.	Purpose and Scope .....	2
2.	Principles.....	2
3.	Definitions .....	2
4.	Appointment of External Examiners.....	4
	External Examiners for on-programme training and assessment.....	4
	External Examiners for EPA.....	5
5.	Appointment Criteria.....	5
	Remuneration .....	7
6.	Appointment process.....	8
	Length of appointment.....	8
	Extensions to appointments .....	9
	Appointment letters.....	9
	Termination of appointment.....	9
7.	Induction.....	10
	Meeting staff .....	11
	Information to Student Apprentices.....	11
8.	The Role of External Examiners in Assessment .....	12
9.	The Role of External Examiners in Quality Enhancement .....	15
10.	External Examiners Annual Reports .....	15
	Sharing reports with Student Apprentices.....	16
	Submission of reports .....	17
	Serious concerns .....	17
11	Responding to External Examiners' Annual Reports .....	17
12	Monitoring and Review .....	18

## 1. Purpose and Scope

- 1.1 This QA statement sets out the principles and processes underpinning external examining of apprenticeship courses at the University of Bath, to include the period of on-programme training and assessment and End Point Assessment.
- 1.2 This QA statement should be read in conjunction with:
  - [Ordinance 15](#) on Examiners and Examinations
  - [Regulation 15](#) on Assessment of Undergraduate and Taught Postgraduate Courses
  - [QA35 Assessment procedures for taught courses of study](#)
- 1.3 This QA statement relates to all apprenticeship courses leading to an award of the University. For an integrated apprenticeship, where the University is the both the Training Provider and End Point Assessment Organisation (EPAO), the appointment and functions of the External Examiner remain the University's responsibility for the period of on-programme training and assessment and End Point Assessment (EPA).
- 1.4 For an integrated apprenticeship, the references made throughout this statement to External Examiners should also be applied to External Examiners for EPA.
- 1.5 For principles and processes relating to external examining of all other taught units and courses of study, refer to [QA12 External Examining \(Taught Provision\)](#).

## 2. Principles

- 2.1 The University attaches great importance to peer review from External Examiners as a key means of ensuring that:
  - the academic standards of University awards and their component parts are set and maintained at the appropriate level, and that the standards of performance are properly judged against this
  - the EPA process accurately measures Student Apprentice achievement against knowledge, skills and behaviours set out in the relevant approved Apprenticeship Standard and meets the requirements set out in the EPA Assessment Plan
  - assessment, to include EPA, is rigorous, fair and fairly operated, and in line with University Regulations and policies
  - the University can compare the standard of its awards with those of other higher education institutions
  - the University's provision is continuously enhanced to reflect developments in the sector, institution and discipline.

## 3. Definitions

**End Point Assessment (EPA):** the synoptic assessment (to include any resits of that assessment) of the Student Apprentice's knowledge, skills and behaviours at the end of the apprenticeship, carried out by an End Point Assessment Organisation (EPAO),

to confirm that the Student Apprentice has met the requirements of the relevant approved Apprenticeship Standard.

**EPA Assessment Plan:** the scheme of assessment approved by Skills England in relation to an approved Apprenticeship Standard which End Point Assessment Organisations use to develop assessment tools and deliver End Point Assessment.

**End Point Assessment Organisation (EPAO):** any organisation on the Apprenticeship Provider and Assessment Register (APAR) selected by an employer and contracted by a Training Provider to carry out End Point Assessment. Where the apprenticeship is an integrated apprenticeship, the Training Provider will also be the End Point Assessment Organisation.

**External Examiner:** independent and impartial advisors who comment on academic and occupational standards, Student Apprentice achievement and assessment processes for their nominated course/units for the period of on-programme training and assessment and EPA, their consistency with other institutions and relevant national qualification or professional frameworks, or other requirements.

**Final Assessment:** are those assessments the results of which count in determining the award or the level of the final award (Degree, Diploma or Certificate of the University) and the award and level of the final award of the apprenticeship (apprenticeship certificate). For an integrated apprenticeship, Student Apprentices are required to pass the EPA to qualify for both the University award and the apprenticeship award.

**Independent (End Point) Assessor:** independent and impartial assessors responsible for delivering End Point Assessment in accordance with the EPA Assessment Plan for the relevant approved Apprenticeship Standard. Their role is to assess a Student Apprentice's competence against the knowledge, skills and behaviours set out in the Apprenticeship Standard. The independent assessor cannot have had any prior involvement in the delivery of on-programme training and assessment for the apprenticeship course.

**Integrated Apprenticeship:** an approved Apprenticeship Standard in which the EPA is incorporated into the main learning aim (usually a degree or other full higher education qualification) and the Training Provider is responsible for delivery of both the period of on-programme training and assessment and EPA.

**Non-Integrated Apprenticeship:** an approved Apprenticeship Standard where the Training Provider is responsible for the delivery of on-programme training and assessment and a separate, independent EPAO is responsible for the delivery of EPA.

**On-programme Assessment:** any assessment activity undertaken during the period of on-programme training and assessment.

## 4. Appointment of External Examiners

4.1 **Ordinance 15.1** establishes the requirement for External Examiners:

*“Examinations for a Degree, Diploma or Certificate of the University, whether taken at one time or in sections, shall be the responsibility of a Board of Examiners.*

*The Board of Examiners shall comprise the internal and External Examiners appointed for each of the subjects or groups of subjects included in the scope of the examination.*

*In every subject or group of subjects in all final assessments (as defined by Regulation 15), there shall be at least two examiners, one at least of whom shall not be a member of the Academic Staff of the University.”*

- 4.2 Accordingly, at least one External Examiner will be appointed for each apprenticeship course, or group of closely related apprenticeship courses.
- 4.3 It is the responsibility of the Head of Department/the appropriate Director of Teaching in the School of Management to ensure that enough External Examiners are appointed with adequate expertise. External Examiner appointments should be phased to ensure an element of continuity.
- 4.4 Normally External Examiners are appointed to a course but, in a small number of instances, they may be appointed to specific units. The responsibilities of the External Examiner must be made clear in the nomination form and in the letter of appointment.
- 4.5 For an integrated apprenticeship an External Examiner can be appointed as both External Examiner for the period of on-programme training and assessment and EPA. The distinct responsibilities of these roles must be made clear in the nomination form and in the letter of appointment. A Department/School can, alternatively, nominate and appoint separate individuals to perform each role.

### **External Examiners for on-programme training and assessment**

- 4.6 If more than one External Examiner is appointed for the period of on-programme training and assessment for an apprenticeship course, responsibility for the units on that course will be divided up between the External Examiners according to subject expertise. However, collectively the External Examiners for an apprenticeship course must be able to provide an effective overview of the course, meeting the expectations of the role set out in sections 8 and 9, including commenting on course coherence and making recommendations for its enhancement. All External Examiners appointed to an

apprenticeship course are expected to attend the main Board of Examiners for Courses considering final awards.

- 4.7 On a multidisciplinary course, where units are drawn from several departments, it is the responsibility of the External Examiner(s) for the course to represent and maintain an overview of the apprenticeship course as a whole.
- 4.8 Further information on the attendance of External Examiners at Board of Examiners is provided in [QA35](#).

### **External Examiners for EPA**

- 4.9 External Examiners for EPA are required to oversee EPA for an apprenticeship course. The External Examiner for the period of on-programme training and assessment can also be appointed as External Examiner for EPA.

## **5. Appointment Criteria**

- 5.1 An External Examiner shall:
- have knowledge and understanding of the UK higher-education sector agreed reference points for the maintenance of academic standards and assurance and enhancement of quality
  - have occupational competence and relevant experience and knowledge in the field covered by the apprenticeship course
  - have academic qualifications/professional qualifications to at least the level of the qualification being externally examined
  - have a good understanding of degree apprenticeships
  - have experience of apprenticeship assessment design and delivery (either externally or internally)
  - have knowledge of the relevant, approved Apprenticeship Standard and associated EPA Assessment Plan
  - have sufficient standing, credibility and breadth of experience within the discipline to be able to command the respect of peers
  - have familiarity with the standard to be expected of Student Apprentices in the course to be examined and are competent in assessing Student Apprentice achievement in higher education at levels relevant to the award to which their appointment relates
  - have fluency in English
  - have met the criteria set out by relevant professional and accrediting bodies
  - have expertise in the enhancement of the student learning experience
  - have awareness of all relevant employment legislation, including safeguarding, as appropriate

- 5.2 An External Examiner appointed for the EPA shall also:
- have expertise in assessing standards, identifying good practice and recommending enhancements to inform EPA development.
  - be willing to undertake relevant training and continuing professional development.
- 5.3 An External Examiner will normally be expected to have had some prior experience of external examining. Where this is not the case, the Head of Department is responsible for ensuring that a suitable course of induction and briefing is put in place to support the appointee in their new role.
- 5.4 Whenever possible, a first-time External Examiner should be appointed as part of a team and mentored by an experienced External Examiner who meets the criteria set out in paragraphs 5.1 and 5.6.
- 5.5 External Examiners from outside the UK Higher Education system, for example from industry, are appropriate in certain circumstances. Key selection criteria will be the relevance of their expertise, recent experience of standards in UK higher education and an understanding of degree apprenticeships.
- 5.6 To avoid conflicts of interest and for the assurance of independence, an External Examiner will **not** be appointed if they are covered by the following categories:
- a. an employee of the University of Bath
  - b. a member of University Court or Council
  - c. any former students or staff of the University unless a period of at least five years has elapsed since leaving the University and all students/Student Apprentices taught by or with the nominee have completed their courses
  - d. a near relative of a member of staff or Student Apprentice involved with the apprenticeship course
  - e. anyone closely associated with the sponsorship of Student Apprentices on the course
  - f. anyone closely associated with training arrangements for the course
  - g. anyone closely associated with EPA delivery or Independent Assessors
  - h. anyone closely associated with an employer organisation where a Student Apprentice is employed
  - i. anyone required to assess colleagues who are recruited as Student Apprentices onto the apprenticeship course
  - j. anyone in a position to significantly influence the future of Student Apprentices on the apprenticeship course
  - k. anyone involved in recent or current substantial collaborative research activities with a member of staff closely involved with the apprenticeship course including its assessment processes
  - l. anyone whose appointment would lead to a reciprocal arrangement involving cognate courses of another institution

- m. anyone replacing an External Examiner who is a colleague from the same Department in the same institution
- n. anyone from Departments in subcontractor organisations which contribute to the course being examined
- o. anyone from the same Department in an external institution where there is already an External Examiner appointed to the same Bath course or group of courses.

- 5.7 Careful consideration should be given to balancing the advantages of appointing an individual able to provide a fully independent perspective against those of someone who has prior knowledge of the apprenticeship course and its ethos, notably as an external reviewer or as a member of a periodic review activity (Degree Scheme Review or equivalent). Where there has been prior involvement of this nature this needs to be transparent when presenting the case for appointment. Possible nomination as an External Examiner should not be discussed with external reviewers or externals involved in periodic review activity (Degree Scheme Review or equivalent) prior to the completion of all approval/review activities.
- 5.8 Anyone who already has a significant commitment during key assessment periods and is therefore unlikely to be able to attend in person for Examiners' meetings and events and give due attention in completing the appraisal of scripts, should not be appointed as an External Examiner.
- 5.9 External Examiners should not normally hold more than two External Examiner appointments for taught courses and units at any one time. Nominees should accordingly give an undertaking prior to their approval that they will not hold more than one other External Examiner appointment at any point during the term of their appointment.
- 5.10 Appointment of retired academics is permissible within a maximum of three years after the date of retirement. Sufficient evidence should be provided of continuing involvement in the academic area in question.

Exceptionally, applications for exemption from the appointment criteria set out above may be made to the Education, Quality and Standards Committee (EQSC) providing a sound rationale. In all such cases advice should be sought from the Assistant Registrar (Faculty/School) and Academic Registry.

- 5.11 For the purposes of avoiding reciprocal arrangements, Academic Registry will hold a register of staff commitments to external examining, updated on an annual basis.

### **Remuneration**

- 5.12 The Vice-Chancellor, acting on behalf of Council, determines the remuneration of External Examiners. Where the remuneration is paid to the External Examiner as a form of employment through the payroll, the External Examiner will need to provide the University with documentation of their right to work in the UK in line with UK Visa &

Immigration Service (UKVI) requirements prior to any payment being made through the payroll.

## 6. Appointment process

- 6.1 The Head of Department is responsible for nominating appropriately qualified individuals to act as External Examiners for approval by the Board of Studies. Nominations for External Examiners with a period of office commencing at the beginning of a new academic session should be submitted to the Board of Studies no later than the final meeting of the previous session. Nominations should be submitted using QA12 Form 1(A).
- 6.2 On behalf of Senate, Boards of Studies are responsible for scrutinising and approving nominations for the appointment of External Examiners. In scrutinising nominations, the Board of Studies will ensure that:
- any individual recommended as an External Examiner has an appropriate level of academic, and where appropriate, professional knowledge, seniority, and experience (see 5.1, 5.2, 5.3 and 5.6 above)
  - where the nominee is new to external examining or acting as an external quality assurer, or is from outside the UK Higher Education sector, sufficient induction and briefing has been put in place to enable the nominee to fulfil their role (see 5.4-5.6 above)
  - the nominee has no existing, or prior, connection with the University that would call into question their ability to exercise objective, impartial and independent judgements (see 5.7 and 5.8 above).
- 6.3 The Board of Studies will approve the appointment of an External Examiner based on documentary evidence which demonstrates that the nominee has met all the criteria outlined above in Section 5. The minutes of the Board of Studies will record the qualifications and current employment of the proposed External Examiner, the apprenticeship courses or parts of courses to which they are appointed and any discussion of appointment criteria in relation to potential conflicts of interest. Senate will then formally note the appointment as recorded in the minutes. Appointments made by Chair's action should be kept to a minimum.
- 6.4 The Education Quality and Standards Committee will receive a report on the appointment of External Examiners where any risks are identified by Academic Registry as part of sampling appointment information provided by Faculties/the School on an annual basis.

### Length of appointment

- 6.5 External Examiners are appointed for three years in the first instance, with a possible extension for a maximum of one further year ([Ordinance 15.2](#)). Upon expiry of this period, External Examiners for taught courses may not be reappointed to the same or any another course of the University until a period of five years has elapsed.



**Extensions to appointments**

- 6.6 Following a satisfactory performance during the appointment period of three years, an External Examiner may be offered an extension to the appointment of one year. For the appointment to be extended, the Faculty/School (Assistant Registrar) must receive confirmation in writing (e-mail is acceptable) from the External Examiner that they continue to meet the criteria and that they have no conflicts of interest. Re-appointments should be submitted to Boards of Studies for noting.

**Appointment letters**

- 6.7 The Secretary to the Board of Studies will advise Academic Registry of External Examiner appointments (and confirm if they include the period of on-programme training and assessment and/or EPA) and extensions of appointment. Academic Registry is responsible for maintaining an accurate register of External Examiner appointments on behalf of the Vice-Chancellor.
- 6.8 Academic Registry will issue a letter of appointment to the External Examiner together with the [Handbook for External Examiners of Apprenticeship Courses](#).
- 6.9 A copy of the appointment letter will be sent to the Head of Department, the Director(s) of Studies and the Faculty/School Assistant Registrar.

**Termination of appointment**

- 6.10 An appointment may be terminated, for any reason, with six months' notice in writing by either party.
- 6.11 The External Examiner may terminate the contract, without notice, in any of the following circumstances:
- a. if the External Examiner suffers serious illness or is incapacitated such that their performance is, or is likely to be affected
  - b. if they are rendered unable to continue to perform their obligations for other good reason
  - c. if a conflict of interest arises during the term of the appointment
- 6.12 The University also reserves the right to terminate the contract, without notice, in any of the following circumstances:
- a. if the External Examiner is deemed to have failed to fulfil all or part of their obligations (this may include the failure to attend Boards of Examiners where attendance is required without good cause, the failure to submit reports, or the provision of incomplete reports) or if their performance, in the context of the University's stated expectations, is judged to be inadequate
  - b. if the External Examiner suffers serious illness or is incapacitated such that their performance is, or is likely to be affected
  - c. if the External Examiner is rendered unable to continue to perform their obligations for other good reason
  - d. if a conflict of interest arises during the term of the appointment

- e. if changes are made or envisaged to an apprenticeship course which render the appointment no longer applicable/desirable (the University will endeavour to provide reasonable notice to the External Examiner wherever possible)
- f. if the University believes there has been any unprofessional conduct on the part of the External Examiner
- g. the University perceives there to be an irretrievable breakdown of the relationship.

6.13 If the External Examiner wishes to terminate the appointment, pursuant to either 6.10 or 6.11 the following procedure is to be followed:

- a. The External Examiner will write to the Dean of the Faculty /the School (email will suffice) citing the reason for the termination (6.10, 6.11(a), (b) or (c)) with a proposed end date.
- b. Where the reason given is **not** 6.11(b), the Dean will respond on behalf of the Chair of Senate, agreeing to the termination and confirming an end date.
- c. Where the reason given is 6.11(b) the Dean will acknowledge the request and seek further advice from Human Resources.

6.14 If the University wishes to terminate the appointment pursuant to 6.12(b), (c), or (d), i.e. if such termination arises from illness/incapacity or a conflict of interest arising or changes to an apprenticeship course (and the External Examiner does not terminate the agreement themselves), it is sufficient for the Dean of the Faculty/School to write to the External Examiner, on behalf of the Chair of Senate, terminating the appointment.

6.15 If the University wishes to terminate the appointment pursuant to 6.12(a), (c), (f) or (g) the following procedure should be followed:

- i. The Head of Department should provide a rationale for terminating the appointment and outline in writing the non-fulfilment of duties, or the unprofessional conduct or the breakdown of the relationship (as applicable), which has prompted the action, to the Dean of the Faculty/School.
- ii. Based on the outline or evidence provided, the Dean of the Faculty/School will make a recommendation to Senate to terminate the appointment. Normally the Vice-Chancellor will take Chair's Action on behalf of Senate to agree to terminate the appointment.
- iii. The Dean will write to the External Examiner informing them of the decision to terminate the appointment.

## 7. Induction

7.1 Following appointment, the Head of Department will ensure that the following information is provided to the External Examiner in a timely manner:

- a Departmental/School contact
- the composition and membership of the Board of Examiners including the names and subject areas of other External Examiners

- the schedule for examining procedures including the proposed dates of the Boards of Examiners for Units and Boards of Examiners for Courses
- the final report(s) of the outgoing External Examiner(s).

For External Examiners acting as External Examiner for EPA, the following additional information will be provided:

- the schedule of EPA activities to include the proposed dates of the Board of Examiners where EPA will be discussed
- the final report(s) of the outgoing External Examiner for EPA.

7.2 The Head of Department is also responsible for ensuring that External Examiners receive appropriate induction and briefing material to enable them to appreciate the aims and philosophy of the provision with which they will be associated, and to contribute in an effective manner to the assessment process. This will include provision of relevant information on the scheme of study and assessment for the apprenticeship course(s)/unit(s) for which the External Examiner has responsibility, such as:

- the Apprenticeship Standard
- the Assessment Plan, where applicable
- the handbook for the course
- the course specification and/or unit descriptions
- course assessment regulations and methods
- the Department/School policy on confidentiality relating to matters of commercial sensitivity (which may arise in relation to assessment of work-based learning), where relevant
- the method and extent of sampling
- the way in which access will be provided to assessed parts of the course (e.g., where the final assessment involves online learning).

7.3 To support the induction provided by the Department, information and guidance for External Examiners is provided via a dedicated web page  
<https://www.bath.ac.uk/guides/guidance-for-external-examiners/>.

### **Meeting staff**

7.4 Departments/the School are strongly encouraged to provide External Examiners with an opportunity to visit the Department/School to familiarise themselves with the course, the Apprenticeship Standard and EPA Assessment Plan (where applicable), the institution and its procedures before the assessment period.

7.5 The Head of Department is responsible for ensuring that External Examiners are informed of any changes affecting their roles and responsibilities.

### **Information to Student Apprentices**

7.6 Student Apprentices will be provided with details of the name, position and institution of their External Examiner(s) through their course handbook (see [QA44 Course Handbooks and Course Specifications](#)). It must also be made clear to Student Apprentices, in their course handbook, that it is inappropriate for them to make direct contact with External Examiners, in particular regarding their individual performance in

assessments, and that other appropriate mechanisms are available, such as an appeal or a complaint. External Examiner reports are shared with Student Apprentices on request (see paras 10.5a and 10.7).

## 8. The Role of External Examiners in Assessment

8.1 One of the core roles of the External Examiner is to assure the quality of final assessment processes and ensure that academic standards of awards are set and maintained at the appropriate level. University Regulations define final assessments as those assessments where the results count in determining the award or the level of the final award (Degree, Diploma or Certificate of the University) and the award or the level of the final award of the apprenticeship (apprenticeship certificate). For an integrated apprenticeship, Student Apprentices are required to pass the End Point Assessment (EPA) to qualify for a University award and the apprenticeship award. The External Examiner should be an independent and impartial adviser who provides informed comment upon the academic standards set, and the assessment of occupational competence, and the Student Apprentices' achievement in response. **The role of the External Examiner is to verify the assessment process and assure overall standards rather than to seek to judge individual cases.** In support of these general principles, the External Examiner is involved in:

- assuring the quality and validity of assessments at the design stage, including the quality of assessment criteria, the setting of assessment questions and the quality of assessment materials and instruments
- assuring the quality of the marking and grading processes, including the quality of marking, moderation/double marking, scaling, etc
- assuring the correct application of relevant assessment regulations
- verifying grading of Student Apprentices in line with the guidance in the Assessment Plan
- assuring the fairness of examining, and examination board processes
- ensuring the consistent use of marking boundaries for units and helping Departments/the School to calibrate their marking
- confirming that the academic and occupational standards sought and achieved are comparable with other universities in the United Kingdom.

8.2 In discharging their role, External Examiners are expected to take into account the University's policy and regulatory framework as outlined in Section 1 and the [University's Statement of Equality Objectives](#) as well as the Office for Student's regulatory requirements for quality and standards, including [Condition B4: Assessment and Awards](#) and [Condition B5: Sector-recognised standards](#), nationally recognised guidelines, e.g. the [UK Quality Code for Higher Education](#), [Subject Benchmark Statements](#), and the expectations of professional accrediting bodies.

8.3 In discharging their role, External Examiners for EPA are required to consider the EPA Assessment Plan for the relevant approved Apprenticeship Standard.

- 8.4 In discharging their role, External Examiners for EPA are also required to act in line with the activities outlined in the External Quality Assurance (EQA) guidance published by the EQA body for EPA. For integrated apprenticeships, this is the Office for Students (OfS). This may include:
- reviewing documentation relating to the EPA, including the EPA assessment instruments, materials and internal quality assurance documentation
  - reviewing a sample of EPA assessed work, including observing live assessments
  - observing assessor standardisation or moderation meetings
  - meeting with Independent Assessors and EPA delivery staff
  - meeting with Student Apprentices and, where possible, employers
  - observing the meeting at which the final decision on the EPA is confirmed (Board of Examiners for Courses).
- 8.5 In accordance with [Ordinance 15](#) and [Regulation 15](#), the University will not make an award without participation in the examining process by at least one Examiner external to the University, who is a full member of the relevant Board of Examiners for Courses. An External Examiner will be involved in agreeing the final marks, and in reaching all decisions relating to the conferment of awards and the determination of final degree classification and confirmation of successful achievement of and the grade of the apprenticeship.
- 8.6 External Examiners are expected to review work and attend meetings of Boards of Examiners as set out in [QA35](#). External Examiners for the period of on-programme training and assessment are not expected to attend meetings of Board of Examiners for Units (BEUs), but they may attend if they wish to do so. They are also not expected to attend BECs considering the progression of Student Apprentices only (where awards will not be considered) unless confirmation of the apprentice's achievement of the academic requirements at Gateway prior to progressing to EPA is being considered, or the course is new.
- 8.7 External Examiners for EPA are not expected to attend meetings of Board of Examiners for Units (BEUs) for EPA but they may attend if they wish to do so.
- 8.8 External Examiners for the period of on-programme training and assessment and EPA are required to attend the main meetings of the Boards of Examiners for Courses (BECs) where conferment of awards, the determination of final degree classification and confirmation of successful achievement grade of the apprenticeship are considered.
- 8.9 A Board of Examiners makes collective decisions with all members being full and equal, and no one member having primacy.
- 8.10 All draft examination papers, and EPA draft assessment materials, the assessment of which contributes to a final award of the University, and other summative assessment

tasks that make a significant contribution<sup>1</sup> to a final award, should be sent, with clear marking criteria and model answers/marketing schemes appropriate to the discipline, to an External Examiner for moderation and advice following the internal moderation procedure.

- 8.11 Procedures for moderation are open to audit by External Examiners who may advise on the appropriateness of the mechanisms for moderating the summative assessments set (see [QA16 Assessment, Marking and Feedback](#)).
- 8.12 An External Examiner has the right to see all degree examination scripts, any assignments contributing to the assessment of the final award, and any forms of assessment for EPA (where the University's retention policy allows). In cases where it is agreed that only a selection of scripts shall be inspected, the principles for such selection must be agreed in advance and must normally include those around classification borderlines (on the understanding that borderline candidates should be considered collectively rather than as individual cases). Where a selection has been agreed, External Examiners may wish to see a representative sample from the top, middle and bottom of the range, and all failures. The guiding principle is that External Examiners should have seen sufficient assessments to assure themselves that internal marking, the marking by the Independent Assessor, and resultant classification of awards are of an appropriate and consistent standard.
- 8.13 External Examiners are informed of regulations and procedures relating to individual mitigating circumstances and assessment offences in the Handbook for External Examiners and as members of the Board of Examiners are made aware of decisions which affect unit outcomes, progression and awards.
- 8.14 Unless they specify otherwise, it will be assumed that the External Examiners support the decisions of the Board of Examiners for Courses which will then be recommended to the Board of Studies, making the award on behalf of Senate.
- 8.15 If, after thorough and careful discussion, an External Examiner should feel unable to endorse the conduct of the assessment process and/or to participate in a collective decision of the Board of Examiners, a full report should be made to the Board of Studies in the Minutes of the meeting of the Board of Examiners. See also Serious Concerns (9.9 and 9.10).
- 8.16 Where the Board of Examiners and Board of Studies are involved in the assessment of multi-disciplinary courses, arrangements for the appropriate External Examiner(s) to be involved in the assessment process should be made by the responsible Board of Studies (as agreed with the Education, Quality and Standards Committee).

---

<sup>1</sup> The definition of 'significant contribution' is all work contributing 7% or more towards the degree classification.

## 9. The Role of External Examiners in Quality Enhancement

- 9.1 A key aspect of the role of External Examiners is to contribute to the ongoing enhancement of the University's provision.
- 9.2 External Examiners are encouraged to comment on the scheme of assessment and the procedures surrounding moderation, assessment and marking; and to offer advice on the content, balance and structure of the assessment strategies employed, and delivery of EPA against the EPA Assessment Plan for the relevant approved Apprenticeship Standard, where applicable.
- 9.3 Departments/the School are expected to use the opportunity afforded by the visits of External Examiners to discuss with them the structure of the course(s) of study and the curriculum.
- 9.4 Reports from External Examiners are used to inform the monitoring and enhancement of apprenticeship courses (see [QA51\(A\)](#)). Reports and comments from External Examiners also form part of the evidence base for the periodic review of courses, Degree Scheme Review (see [QA13](#)) or equivalent. It is also expected that Departments/the School will invite comment from External Examiners when proposing amendments to courses of study affecting the nature and pattern of assessment (see [QA4](#)).
- 9.5 Reports from External Examiners for EPA are used as evidence to inform EQA monitoring of EPA delivery.

## 10. External Examiners Annual Reports

- 10.1 External Examiners are required to provide an annual report on the course(s) or unit(s) for which they are appointed, including observations on academic and occupational standards, aspects of good practice, learning and teaching, course structure and content. A brief verbal report should be made at the Board of Examiners for Courses for finalists (see para 4.7 and [QA35](#) para 7.7.9) with the full written report provided within six weeks of the completion of the examination process (see 10.8). External Examiners are also expected to make further comments at the end of their period of office; a report which is then made available to the incoming External Examiner.
- 10.2 Where an External Examiner is acting as both External Examiner for both the on-programme period of training and assessment, and EPA, this should be clear through the submission of two separate reports:
  - QA12(A) Form 2: External Examiner Annual Report (On-programme Training and Assessment)
  - QA12(A) Form 3: External Examiner Annual Report (End Point Assessment)
- 10.3 External Examiners for EPA are required to provide an annual report ([QA12\(A\) Form 3](#)) for each year that EPA delivery occurs. This report includes observations on



academic and occupational standards, areas of good practice, assessment awards and conduct of the EPA process for the course for which they are appointed against the EPA Assessment Plan for the relevant approved Apprenticeship Standard. This report should be submitted to the University, as EPAO, who will provide a copy to the relevant EQA body as part of ongoing monitoring arrangements.

- 10.4 Where a course is delivered via several modes, this should be reflected within the content of report, either by the submission of separate reports, or by clear differentiation of comments on each mode within the body of a single report. Departments will advise External Examiners on which approach is appropriate for the courses to which they are appointed.

### **Sharing reports with Student Apprentices**

- 10.5 The University's approach to quality management is underpinned by the principles of peer review and the informed student voice. It is recognised that the External Examiner system depends on a degree of confidentiality to ensure feedback is frank, whilst providing student representatives with sufficient contextualised information about the quality and standards of their course. With these twin purposes in mind, the External Examiner's report form ([QA12\(A\) Form 2](#)) is in two parts:
- a. Part 1 will be shared by staff with student representatives via Staff Student Liaison Committees and with all students upon request from the [QA12\(A\)](#) web page. It is expected that the majority of the External Examiners' comments will be provided within Part 1 of the form. **External Examiners should NOT include any data relating to individual Student Apprentices in Part 1.**
  - b. Part 2 of the report form is provided for instances where an External Examiner thinks it necessary to:
    - make comments relating to an individual Student Apprentice or member of staff (which would be covered by the Data Protection Act); and/or
    - make comments on an issue which might be regarded as sensitive or of particular importance, where the External Examiner does not deem broader circulation to be appropriate. These might include categories that the University has defined as restricted under the Freedom of Information Act, such as information that might prejudice the University's commercial interests, information held under obligation of confidentiality or information that is intended for publication at a later date.
- 10.6 Part 2 of the report form will not be shared with student representatives as a matter of course. However, External Examiners should be aware that the University may be obliged to disclose the contents in response to a specific request under the Data Protection Act or Freedom of Information Act. The University will consider such requests on a case-by-case basis and will endeavour to consult with the External Examiner prior to disclosure. Further information regarding the University's policies on Data Protection and Freedom of Information is available at:
- <https://www.bath.ac.uk/teams/freedom-of-information/>
  - <https://www.bath.ac.uk/legal-information/data-protection-policy/>



- 10.7 The Head of Department is responsible for ensuring that Part 1 of an External Examiner's report is shared with student representatives via Staff Student Liaison Committees (SSLCs) together with the response from the Department/School and any other contextual information on actions taken or planned in response. The reports and responses are also shared with Student Apprentices upon request from the [QA12\(A\)](#) webpage. The personal address of the External Examiner and Part 2 of the report should be removed prior to circulation. Where proceedings of SSLCs are published online, steps must be taken to ensure that web pages are accessible to members of the University only.

### **Submission of reports**

- 10.8 The Vice-Chancellor is the University officer to whom the External Examiner formally submits their report. Annual reports should be submitted **within six weeks of the completion of the examination process**. Where possible they should be submitted electronically to: [externalexaminers@bath.ac.uk](mailto:externalexaminers@bath.ac.uk). Alternatively, they can be sent by post to the Vice-Chancellor, care of: Academic Registry (External Examiners), University of Bath, Claverton Down, Bath, BA2 7AY.
- 10.9 Once the report has been received, the designated Department/School administrator may then proceed with the payment of the External Examiner's fees.
- 10.10 Academic Registry is responsible for the institutional co-ordination of the receipt and recording of External Examiners' reports. In liaison with Academic Registry, the Secretary to the Board of Studies will check for receipt/non-receipt of reports and request that the Head of Department send a formal written request by letter where reports are missing. Where a report is still not forthcoming, Academic Registry will send a further institutional reminder on behalf of the Vice-Chancellor.

### **Serious concerns**

- 10.11 An External Examiner will be informed of their right (through the External Examiner's Handbook) to raise any matter of serious concern with the Vice-Chancellor, if necessary, by means of a separate confidential written report. In such circumstances, the University would provide a considered and timely response, outlining any actions it will be taking as a result.
- 10.12 Where an External Examiner has a serious concern relating to systemic failings with the academic and occupational standards of an apprenticeship course and has exhausted all internal procedures, including the submission of a confidential report to the Vice-Chancellor, they may send a notification to the relevant professional, statutory or regulatory body.

## **11 Responding to External Examiners' Annual Reports**

- 11.1 External Examiners can expect consideration to be given to any concerns that they raise and can expect to have the nature of any resultant action or rationale for lack of action communicated to them.

- 11.2 On behalf of the Vice-Chancellor, Academic Registry will disseminate reports to:
- the Head of Department
  - the Director of Teaching
  - the Director of Studies
  - the Assistant Registrar in the Faculty/School for further circulation as appropriate.
- 11.3 External Examiners' reports are considered at a number of levels within the institution in order to ensure that action is taken at a level appropriate for any concerns raised:
- the Vice-Chancellor or the Chair of the Education, Quality and Standards Committee, advised by Academic Registry, may take up specific points with an External Examiner and require action by the Department/School, or raise broader themes via the Degree Apprenticeships Quality and Standards Group (DAQSG).
  - the Dean or an Associate Dean of the Faculty/School, advised by the Assistant Registrar or Academic Registry, may take up specific points with relevant colleagues and may disseminate good practice, or address poor practice, through the Board of Studies or via the Degree Apprenticeship Quality and Standards Group (DAQSG).
  - the Head of Department is responsible for ensuring that any matters of concern raised in External Examiners' reports are addressed at course level, by raising specific points with the academic staff responsible for the delivery of the course. Where the requirements of external professional bodies are the focus of comments, the Head of Department is also responsible for informing those bodies of action taken in response to the External Examiner's reports.
- 11.4 The Head of Department will respond to the External Examiner in writing, normally within six weeks of receipt of the report and should copy this to the Head of Department, Director of Studies and to Academic Registry using [externalexaminers@bath.ac.uk](mailto:externalexaminers@bath.ac.uk) and if appropriate, to the Dean and Associate Dean.

## 12 Monitoring and Review

- 12.1 Faculty/School Learning, Teaching and Quality Committees monitor External Examiners' reports, formal responses and reports of action taken, as part of the monitoring and enhancement of apprenticeship courses (see [QA51\(A\)](#)). They are also responsible for ensuring that any good practice is disseminated within the Faculty/School.
- 12.2 SSLCs discuss External Examiners' reports and their responses alongside other annual course monitoring information.
- 12.3 Academic Registry prepares an annual overview of the recurring themes, institutional level issues and good practice identified by External Examiners, and monitors the appointment of External Examiners (see 6.4) for consideration by the Education, Quality and Standards Committee. Any recommendations requiring institutional authority will be forwarded to Senate for approval.

## Statement Details

<b>Issue Version:</b>	<b>1.2</b>
<b>Date:</b>	<b>August 2025</b>
<b>Antecedents:</b>	<p>QA12 External Examining Taught Provision</p> <p><i>Education, Quality and Standards Committee</i></p> <p>19 October 2023</p> <p>20 February 2024</p> <p>14 May 2025</p>
<b>Related Documentation:</b>	<p>QAA UK Quality Code for Higher Education  <a href="https://www.qaa.ac.uk/quality-code">https://www.qaa.ac.uk/quality-code</a> (including Advice and Guidance on External Expertise)  <a href="#">Regulations for Student Apprentices</a>, especially Regulation 15 – Assessment  of Undergraduate and Taught Postgraduate Programmes.  <a href="#">Assessment Regulations</a>  Specific rules of IMCs are outlined in our assessment regulations or in the Individual Mitigating Circumstances and Assessment document. Details of the IMC procedures that apply to specific courses are available in the University's <a href="#">Assessment Regulations</a>.</p>
<b>Author:</b>	Academic Registry