



CITY OF LONDON COLLEGE

A UNIVERSITY SECTOR PREMIER College

Policy on Externality in Higher Education

Aligned with OfS Regulatory Framework and QAA
Quality Code

2025/26

Document Custodian: Senior Management Team
Review Cycle: Annually, or as required in response to regulatory or strategic changes
Last Reviewed: July 2025
Effective Date: July 2025
Review Date: July 2026
Version: 1.7.25
Circulation: Public: (Web Publication)
Sensitivity: Unclassified

1. Introduction

Externality plays a pivotal role in ensuring that academic programmes and processes within higher education institutions meet nationally and internationally recognised standards of quality and integrity. The policy set out in this document is designed to embed structured, consistent, and meaningful use of external expertise throughout the academic lifecycle - spanning programme development, delivery, assessment, and review.

This policy is shaped by key regulatory requirements, notably those outlined by the Office for Students (OfS) - especially Condition B1 of its Regulatory Framework, which mandates that academic standards must be consistent with sector-recognised standards - and the QAA UK Quality Code for Higher Education, which emphasises externality as an underpinning principle of quality assurance.

Externality acts as a safeguard against academic drift, internal bias, and insularity by ensuring that subject standards are comparable across the sector and that programme content and assessment methods remain relevant to evolving disciplinary, professional, and labour market contexts. Moreover, it supports institutional enhancement by bringing in critical, constructive perspectives from those who can benchmark practice against other providers and sectors.

This policy also reflects sector-wide expectations for student voice and outcomes, integrating externality as a tool to ensure that students receive a rigorous and relevant education. For institutions aiming for reputational strength and regulatory compliance, clear and robust engagement with externality is not optional but essential.

2. Purpose and Scope

This policy formalises how the college incorporates externality into academic quality assurance and enhancement processes. It applies to all levels of study - undergraduate, postgraduate taught, and postgraduate research - and to all academic programmes that lead to credit or awards.

The policy serves two core functions:

- To assure internal and external stakeholders - including students, PSRBs, employers, and regulators - that the institution maintains credible academic standards.
- To use external perspectives as a driver for critical reflection, innovation, and enhancement of learning and teaching practices.

3. Definition of Externality

Externality is defined here as the formal involvement of individuals or bodies external to the institution who contribute independent expertise to the design, delivery, assessment, and periodic review of academic programmes. These contributors bring objectivity, sector benchmarking, and subject/professional knowledge that are not available internally. Their role may be academic, industrial, or regulatory in nature depending on the context.

4. Principles

The following principles govern the use of externality at the college:

- **Independence:** External contributors must be demonstrably independent and free of conflicts of interest.
- **Expertise:** Participants must be appropriately qualified with up-to-date academic or industry knowledge.

- **Transparency:** Contributions from external parties must be documented, reviewed, and subject to institutional oversight.
- **Enhancement-Focused:** Externality is seen not just as a check but as a means of continual improvement in teaching and learning quality.

5. Areas Where Externality Is Required

5.1 Programme Design and Approval

All new programmes undergo scrutiny from external academic or professional experts to validate the academic rigour, curriculum structure, and vocational relevance. Their commentary ensures that new provision aligns with national qualifications frameworks and subject benchmarks.

5.2 Assessment and Standards

External Examiners are appointed in accordance with the UK Quality Code. Their responsibilities include:

- Reviewing sample assessments.
- Judging academic standards.
- Confirming fairness and comparability across the sector.

Their reports form a core part of annual monitoring processes and are shared with students in summary form, with institutional responses published.

5.3 Periodic Review and Revalidation

At defined intervals (usually 5 years), existing programmes are reviewed by panels including external members. These reviews assess the continued validity and relevance of the curriculum, student achievement, and strategic alignment. Recommendations are used for forward planning and resourcing.

5.4 Research Degrees

For research degree programmes, externality is critical at both programme level (via doctoral programme reviews) and individual level (via use of external examiners for viva examinations). This ensures research integrity, academic rigour, and sector comparability.

5.5 PSRB Engagement

Where professional accreditation is pursued, PSRB representatives act as key external stakeholders. Their input affects curriculum design, assessment regulation, and graduate competency assurance.

6. Selection and Appointment of External Contributors

The institution maintains strict selection criteria for all external contributors. These include:

- Subject/professional expertise.
- Absence of recent employment or collaborative history with the institution.

- No familial or other conflicts of interest.
- Willingness to engage constructively and with integrity.

Appointments are approved by the Academic Board or equivalent and are subject to initial and ongoing training.

7. Reporting and Action

External contributions are formally recorded in:

- Programme validation reports.
- External Examiner annual reports.
- Periodic review documentation.

Responses to external input are managed through action plans which are monitored by academic governance structures. The Quality Assurance Committee provides annual oversight of themes arising from external feedback.

8. Quality Assurance and Enhancement

Externality is a key component of the institutional quality cycle, contributing to:

- Benchmarking against national standards and good practice.
- Early identification of emerging risks.
- Curriculum modernisation.
- Student satisfaction and outcomes enhancement.

9. Monitoring and Review of This Policy

This policy is subject to review every two years or sooner if required by changes in the regulatory environment or institutional strategy. It will be updated in consultation with the Academic Board and relevant stakeholders, including student representation.

The End