

QAA Consultation

Group response to the QAA's proposed Institutional Review method

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The following is the 1994 Group's response to QAA's consultation on a new method for reviewing higher education institutions in England and Northern Ireland. For more detailed information please refer to the individual responses of our member institutions.

Members of the 1994 Group are: University of Bath, Birkbeck University of London, Durham University, University of East Anglia, University of Essex, University of Exeter, Goldsmiths University of London, Institute of Education University of London, Royal Holloway University of London, Lancaster University, University of Leicester, Loughborough University, Queen Mary University of London, University of Reading, University of St Andrews, School of Oriental and African Studies, University of Surrey, University of Sussex and University of York.

General Comments

While the 1994 Group's response to the individual questions of the consultation appear below, there are some general comments we would like to raise for which we could find no obvious space elsewhere in the document.

We welcome the opportunity to respond to the questions proposed and feel that there are some good ideas within the body of the consultation. We are aware however that the higher education (HE) sector is currently undergoing substantial changes and that the proposals are made (perhaps understandably) without detailed reference to these changes. This includes the post-Browne Review of Higher Education Funding and Student Finance (Browne Review) and Comprehensive Spending Review (CSR) environment where the market will itself become a judge of quality.

An additional area of concern not covered elsewhere relates to the credibility of the process if team interaction and consideration for documentation is reduced and if there is an increased burden placed on auditors should the number of Audit days be cut. Unless this greater volume of work for is appropriately paid and policed, arrangements are unlikely to be acceptable to auditors, their employers or the institutions audited.

Consultation questions

Consultation Question 1

(a) Do you agree that the changes outlined in the document take account of the requirements of the sponsoring bodies and the QAS principles?

The 1994 Group (the Group) feels that broadly speaking the changes outlined in the document do take account of the requirements of the sponsoring bodies and the QAS principles. We also welcome the opportunity for institutions to redeem a poor outcome after four years. However, we are concerned about an Ofsted-style report where the HE market is driven by league tables. It is also questionable whether an Institutional Review report would be able to provide the information the public would find most useful, or if it would be understood outside of its context. We suggest that the sector would benefit more from a model of engagement with its peers where matters could be discussed and addressed.

(b) Will the changes help to strengthen the management of quality and standards in institutions?

The Group believes that there is little evidence to support this. While the four judgement areas may serve to focus the attention of institutions on these specific areas, we are unsure how this might serve to strengthen the management of quality and standards within institutions. Action plans and follow up reports may be useful.

The Group wishes to acknowledge its support for the present quality enhancement framework, which is testament to the high standard of UK Higher Education Institutions' (HEIs) management of quality and standards. Under a new system individual institutions must maintain a certain degree of independence of responsibility for maintaining and monitoring their standards.

To depart from the current system and move towards a grading system may prove problematic for specialist institutions; quality assurance practice must reflect the specific characteristics of courses and institutions and their allocation of resource.

There is a significant risk that the management of quality and standards will suffer if there is not sufficient space allowed for frank discussion between peers. Review teams must not be spectators, but must engage in, and allow dialogue with and between institutions, to find solutions to common problems.

(c) Will the changes provide clearer information about quality and standards to a variety of stakeholders?

Most of our member institutions recognise the usefulness of providing clearer information that is simple, written in plain English and based on a limited range of criteria. It is generally acknowledged that this may succeed in reaching a broader audience of current and prospective students and the general public, and that the straightforward layout will be especially useful to non-specialist audiences.

However, it remains the general consensus that stakeholders may be confused by the different categories of information which are not considered adequately concise or understandable. It is unlikely that Institutional Review reports in this form will become a primary resource of information for stakeholders. The proposal not to publish the evidence base is also deemed unhelpful.

Consultation Question 2

(a) Do you agree that further consideration of the way in which collaborative provision and overseas provision is reviewed is required?

The Group has mixed views about this, with some institutions remaining impartial or seeing no cause for further consideration. Others felt that further consideration is necessary, given the very significant expansion and diversification of this type of activity since the current model was developed, and the importance of assuring this provision to the status and standing overseas of UK HE.

Overall, we think that it is vital that institutions are given clear guidance on how such reviews will operate. The Review method needs to be sufficiently flexible to take account of the diversity of collaborative arrangements across the sector, noting that this diversity may increase still further in the next few years.

(b) Do you have any suggestions for improving the current process?

1994 Group members who felt able to comment provided the following comments:

- i) Remove hybrid Audit, it is not effective and detracts from the review of the institution.
- ii) Clarification of the criteria used in determining the mode of review of collaborative provision would be welcome.
- iii) It would not be appropriate to introduce judgements to separate overseas audits. Overseas audits are conducted on a selective rather than on a universal and systematic basis; to apply judgements to institutions which happened to have been selected would be inequitable and inconsistent.
- iv) Many partnership agreements will need to be rewritten to accommodate changes in HE funding models.
- v) Review of collaborative provision needs to be more flexibly adjusted to the scale of the provision; this flexibility should follow a consistent and transparent framework; any collaborative provision review should have a clearly identified approach, which is set out in more depth than the current Section 5 of the Institutional Audit Handbook provides.

Consultation Question 3

(a) Does Annex 2a or 2b in the document express judgements in a useful, informative and credible way, and is one more helpful than the others to particular groups of stakeholders?

There was no consensus among our members, with arguments both in favour and against the two approaches.

Overall, the Group strongly opposes any type of gradation or any mechanism which would encourage the development of league tables.

(b) Suggested alternative words to express the judgements

The fact that the judgements themselves appear to require explanation would seem to run counter to the requirement for the outcomes of Review to be accessible and easily understood.

Some of our members are prepared to accept the phraseology used in Annex 2a, others submitted the following suggestions:

- i) "Threshold / below threshold" is informative and closest to the judgement being reached, but may not be easily interpreted to anyone unfamiliar with the methodology.
- ii) "Acceptable / unacceptable"
- iii) "Approved or not approved" (possibly with reservations) would be clear and unambiguous. However, it is also felt that the terminology should be more positive to reflect the high standards of the sector.
- iv) "Satisfactory / Unsatisfactory"
- v) "Meeting QAA requirements / Not meeting QAA requirements"
- vi) If a trinary scheme were adopted, "Good / Satisfactory / Unsatisfactory" would seem appropriate.

In general it was widely felt that the judgments would benefit from a more positive tone, as the current expressions are too passive for external audiences to fully appreciate their significance.

(c) Suggestions for alternative formats

The Review could become more of an evaluative commentary than a rigid set of grades. This more narrative approach may enhance understanding of the judgments being made and provide a more secure basis for prospective students' decisions.

The differentiated judgments seem to contradict the basic principle of showing more clearly how threshold standards are being met. When it is a basic case of meeting a criteria or not, it is not clear what a four-level judgment can add in this area. A trinary scheme may be a better alternative. In quality and enhancement, the differentiated judgments are potentially more useful: but to differentiate some and not others of the four categories of judgment would create an even more confusing result for stakeholders.

It might be appropriate to augment these general criteria with the publication of the detailed guidance for Review teams that is provided by QAA. The production of this detailed assessment criteria may be sufficient to limit any lack of transparency in the process, and also ensure that HEIs and Review teams have a solid shared understanding of the issues under consideration during an Institutional Review.

(d) What will be the challenges to institutions and audit teams in the use of the judgement formats given as examples?

The diversity of institutions will make it difficult to achieve parity of judgements across the sector, and the types of evidence used in forming the judgements will not necessarily be accessible to non-specialist audiences, which may present a challenge to institutions falling below the expected level.

If a four-point scheme is adopted, the Review panel will inevitably be drawn into focussing on the determination of the grade at the expense of investigation, evaluation and constructive criticism. The panel may also find it difficult to establish a sufficient evidence-base for some of the finer judgements given the limited time available.

e) Do you have any suggestions for further guidance on which to base judgments?

The Group would appreciate more clarity on whether the Review is making judgements about the outcomes or the processes, as there seems to be some disparity over this in the document. It is unclear whether the judgment will be expressed as a judgement about outcomes (standards, etc.) or as a judgement about the effectiveness of the assurance process. It might be noted that, if the judgment is about outcomes, it is difficult to see how a judgment about threshold standards could be other than binary (either the threshold standard is appropriate or it is not). If, however, the judgment is about the effectiveness of the process, a graded judgment is possible (if not necessarily desirable). Any confusion could be extremely misleading.

The idea that the recommendations should not be differentiated by wording, but by having variable timescales for action is welcome. This aligns with the methodology used by some professional bodies, and conveys suitable urgency where necessary, but without generating a report that can be converted into a league table.

Consultation Question 4

Do you see any particular challenges for institutions in providing documentation via upload to a secure QAA electronic folder, or for review teams in using the documentation?

The Group welcome the proposal to provide documentation electronically, both for reasons of sustainability and to reduce administrative burdens on institutions.

The choice of software will impact on whether or not this is challenging. It would be preferable to move away from the current webmail interface towards a Sharepoint-style website such as that which QAA have been piloting. This would enable the preparation for the Review to be undertaken progressively. We would ask that the format of the documents to be uploaded, as well as the content of the public information set, be agreed early in order to enable this.

In order to reduce the burden on institutions it is suggested that QAA would offer appropriate training and support to HEI staff, and specify in the guidance that institutions should not reproduce the documentation in hard copy for the Review visit.

The guidance should also explain who has access at QAA and in the HEI to the secure folder, and whether the analysis of the public information set would be a public document and therefore subject to the Freedom of Information Act.

Consultation Question 5

The Group feel that it would be more appropriate to consider the issues about reference points once the revision of the Academic Infrastructure is further advanced. We ask that QAA consider whether extending this framework would impose an additional regulatory

burden on HEIs, and therefore be inconsistent with the principle of the Quality Assurance System relating to the need to operate efficiently and avoid disproportionate burdens on HEIs.

(a) Do you agree that agreed reference points for review should be increased to include more than the Academic Infrastructure?

Increasing the range of reference points risks placing increased burden on institutions and risks erosion of institutional autonomy. However, if agreement were reached across the sector, we would support a limited number of additional reference points, as part of an evolving system, provided that the status of such reference points and of their various provisions are clear. It would be necessary for clear guidance to be given as to how Review panels should (and should not) use the additional reference points and whether the reference points were mandatory or not.

(b) Is agreement through the substantive / minor changes process appropriate?

It will be important to clarify what would be classed a substantive or a minor change and whether this is determined by the Quality in Higher Education Group (QHEG) with the sector.

(c) Do you see any problem with using the additional reference points currently being suggested?

Not all of our member institutions support the use of these additional reference points. As noted above, the inclusion of further reference points increases the burden on institutions. Furthermore, some of the reference points identified in 3b will not be relevant for all institutions, and the guidance for institutions in supporting international students is not yet developed.

We question the inclusion of the RCUK Researcher Development Framework among the suggested reference points. In addition, the references to the *European Standards and Guidelines* and *Framework for Qualifications of the European Higher Education Area* are particularly unhelpful.

Consultation Question 6

(a) Do you agree that it would be useful to enhance the role of the institutional contact as described?

While some members recognise the advantages in having a single representative through whom to channel the process, others caution that the role is a challenging one and may incur additional expenditure during a period when resources are at their tightest.

(b) Are there other tasks or responsibilities which the institutional facilitator should carry out?

The responsibilities of the institutional facilitator, as described, seem appropriate.

(c) Do you agree that the role of “lead student representative” as described in the document should be included in the institutional process?

The Group welcome the inclusion of such a role as it helps to reinforce the centrality of students to the review process, although there would have to be some thought given to training and the transfer of responsibility from one sabbatical officer to their successor.

Consultation Question 7

- (a) What do you see as the challenges for institutions of online briefing?**
(b) Is it feasible to expect institutions to start preparing their SED after only an online briefing and remote contact with the coordinating QAA officer?

We welcome the provision of a high-quality online and telephone support package for institutions, but warn that an online briefing and remote contact cannot replace face-to-face briefings in which queries, which are often institution-specific, can be quickly resolved, particularly for those with less experience of QAA processes.

In addition, we feel that HEIs may want to start preparing or planning their SED well in advance of the audit, and this should not be constrained by the timing of the online briefing.

Consultation Question 8

- (a) Do you agree that there should be provision for review judgements to be changed after the follow-up process?**
(b) Should the visitors be peers or can QAA officers carry out follow-up visits and give a new judgement?

The Group support the proposal that there should be provision for Review judgments to be changed after the follow up process. For example failing judgments would be revised where there has been clear evidence that effective action has been taken to address the concerns that led to this judgment. It is essential, however, that the principle of peer review is maintained in relation to judgments on the institutional management of quality and standards in the follow up process. Treating the full follow-up as properly part of the peer review process would mark the importance of the decision and would ensure that the revised judgment has an equivalent status with the original judgment. Consequently any new judgments must be made by institutional reviewers and not QAA officers, or if carried out by officers, their findings should be shared with the original audit team before final sign off to ensure that those who made the judgement are happy with the resolution of any issues.

Consultation Question 9

- (a) What do you see as the main challenges for institutions of the way in which the process of thematic elements will operate?**

The Group would like to express some hesitancy towards the relevance, practicality and helpfulness of thematic review. In particular, there is awareness that not all themes will be relevant for all institutions, and therefore flexibility in the engagement with themes would be important.

It is also not entirely clear how the process would work, more detail would be needed to indicate how sufficient drilling down will be possible, to make the evidence for any commentary credible and therefore meaningful. Thorough guidance as to how to present this information and to keep it separate from the information used by the reviewers in reaching their judgements would also be needed.

While we welcome and recognise that Review findings for the thematic review element will not be subject to a judgment, due to reasons of consistency and comparability, we have a number of concerns.

- (i) The inclusion of the thematic element in Institutional Review will mean that themes are explored through a random selection of institutions, which may not be representative of the sector, and may not provide the most helpful examples of good practice.
- (ii) If evaluations of thematic elements are published in the report of the Review alongside the judgments and evaluation of the core elements, prospective students and others will not be presented with consistent information between reports. Given that certain themes are likely to be of more or less obvious interest to prospective students, that some themes will be focussed on enhancement and others on quality assurance, and that some themes are likely to be more challenging for the sector as a whole, the inclusion of a thematic element in the report of the Institutional Review could potentially distort prospective students' perceptions of an institution.
- (iii) The thematic elements may highlight a particular issue that is attracting public concern at a particular time. While it might be appropriate that the QAA investigate such issues, a report which comments on this area may unfairly single out institutions for criticism because they happen to be scheduled for audit during that particular period.

Furthermore, the Group fear that the proposed process could have an adverse impact on both the review of the chosen themes and the core of Institutional Review. It will be a major challenge for the Review panel to do justice to both the core and thematic elements of the review within the given timescales, and to maintain a proportionate approach to each part of the Review. There is also some concern that, while the thematic review does not itself eventuate in a judgement, the review of the thematic element could influence the panel's evaluation of the core elements of the review and contaminate these judgements, thereby compromising the comparability of the judgements across the sector.

Another concern is the selection of themes. We would stress the importance of the implementation of an effective mechanism to select the themes which are to be pursued. The thematic issues selected for consideration in Institutional Review must reflect substantive issues and not be driven by short-term or insubstantial concerns.

Overall the Group are concerned about the additional burden thematic reviews would put on institutions, both in terms of workload and timing issues. The integration of the thematic element in the Institutional Review might increase delays and impede a timely response to current concerns.

(b) Can you suggest a more effective way for the process to operate?

We would suggest that, apart from thematic reviews, the sector can look to share and develop practice on thematic issues through workshops, conferences and online forums. If the thematic and the core elements of the Review were to be separated, the thematic element could be conducted through a process of consultation and case studies. Another alternative to the proposed process could be the replacement of a thematic element with a collaborative review, for institutions with significant collaborative provision. This would negate the need for a separate review of collaborative provision.

If the process goes ahead, the Group would strongly suggest that thematic reviews are not included in the Institutional Review reports. They would be better suited for use in

aggregated reports only. This is because inclusion in institutional reports would reduce the use of reports for comparability. In an aggregate sector-wide report the thematic reviews could be presented as a collective snap-shot of how institutions are addressing particular issues at a specific time period. This report could identify the institutions reviewed as part of the 'theme', but in the spirit of the current QAA 'outcomes' reports would not name individual institutions in the body of the report.

We would also suggest that the sector be involved in choosing what themes should be reviewed following the example of the Scottish system. If the thematic element were to remain an integral part of the Institutional Review, the Group consider that it would be important that the institutional facilitator be included in the QAA's briefing of the team on the approach to reviewing themes, in general, and on the more specific guidance in relation to particular themes. The QHEG is well placed to ensure this, and the draft protocol published by QHEG on how themes would be identified appears to be broadly appropriate.

Consultation Question 10

(a) What do you see as the main challenges for institutions in the way in which the process for introducing changes to the review process will operate?

The Group consider the uncertainties that come from changes to the operation of the Review process to be a major challenge. It is difficult to comment on how realistic the timescales are until it is known what is expected, and how different it will be from the existing process. This will lead to widespread uncertainty over the nature of the Review to be undertaken until a few months prior to a Review being undertaken, thus making it difficult for institutions to prepare and to spread their preparations over an appropriate period of time. It will also make it challenging for institutions to ensure that their internal quality assurance and enhancement activities are mapped onto and produce the sorts of evidence that may be required by a changed process. There is also a risk that Review teams will not be sufficiently briefed or attuned to the changes and therefore may make flawed judgements.

The unclear voice of the sector in changing the Review process is another challenge we perceive. There is uncertainty over how much of a voice the sector will have in determining where a change is necessary; and there is concern over the suggestion that QAA will be able to make changes to the operation of Institutional Review without consultation with either the sector or QHEG. While the draft protocol on changes to Institutional Review gives some examples of the types of changes that might take place under the heading 'operational', greater definition and clarity in this area would be desirable. Furthermore, the subjective nature of changes may cause disagreement between the QAA and the sector.

(b) Can you suggest more effective ways for the process to operate?

In order for the process to be fair, institutions must have maximum preparation time possible. Approximately twelve months prior to a Review would be an appropriate point to inform institutions of the precise details of the Review methodology. Furthermore, it is not appropriate to change the basis on which judgements are being made without a clear break in the process, so that it is transparent to all stakeholders that the judgement on Institution A is not the same as the judgement on Institution B.

Another suggestion for making the operation of the process more efficient is to establish at the outset a date at which a substantive review of the process from first principles should take place. Such a review would ensure that Institutional Review as a whole remains current and valid, and that cumulative changes to the process made over time have not had unintended negative consequences on the operation of Institutional Review. A commitment

to undertake such a major review of the Institutional Review process, and a date for it, should therefore be agreed and published.

Consultation Question 11

(a) Are there any comments that you would like to offer about the way in which the QAA complaints and appeals procedures work?

No comments.

(b) Appeals are currently allowed against judgements of no confidence only: should the scope of the appeals scheme be broadened?

If the new Review method only has two judgements (pass and fail), the Group see no reason for broadening the scope of the appeals scheme. However, if a system of graded outcomes were to be introduced the Group think the scope of the appeals scheme should be broadened. The opportunity for an early follow-up review would be beneficial in this respect. A comprehensive appeals procedure is fundamental in ensuring transparency and accountability in the Review processes.

Consultation Question 12

What do you see as the particular challenges to institutions to working to the proposed timeline?

We are entering a period of significant change across the sector, and institutions are responding rapidly to the outcomes of the Browne Review, the CSR, as well as to several changes in the quality assurance and enhancement landscape. There will naturally be challenges as institutions make changes to their academic programme and academic structures. The Review method needs to be flexible enough to cope with a shifting institutional landscape and acknowledge that things may change for an institution over the period covered by the timeline.

For the Institutional Facilitator the engagement is extensive and will compromise some aspects of their work. Institutions will require time to prepare documentation (to suit everyone's individual needs/expectations) and upload it to the secure QAA site, building in contingency time for testing and ensuring that the documentation displays as intended. Preparation time will be compromised by late confirmation of the Review method to be used and of the themes to be pursued. Five weeks to prepare and upload documentation, particularly if at a busy time of year for those responsible, or if there are technical difficulties, may be rather onerous and challenging and is considered neither practical or realistic.

In addition, External Examiners are paid for the time that they spend at the institution in which they are examining, and are senior members of their own institutions; it would not therefore be realistic to expect them to meet with an Institutional Review team at short notice and as an additional visit, and moreover without receiving payment for their time.

There are concerns over the suggestion that the QAA will be 'more proactive' in proposing specific dates for Review visits, on the basis of the published dates of academic terms. Given the significant demands made on the time of senior staff by an Audit visit, and that the academic year is significantly more complex than is revealed by term dates, universities will struggle to support this approach and recommend that the current approach to setting the dates of Institutional Audit visits be rolled forward to Institutional Review.

Another major challenge will be ensuring continuity of student representatives in the process. This will be particularly problematic if the Review schedule straddles academic sessions.

Consultation Question 13

Are there any other comments you wish to offer about any part of the proposed method?

There are a number of other detailed issues members of the Group wish to highlight:

- i) The lack of a feedback meeting at the end of Institutional Audits, where the team outlines their headline conclusions to the institution under review, has been a significant weakness of the Audit process and should be addressed.
- ii) The proposal that the action plan should be agreed and published within 10 weeks is unlikely to be realistic, given the need for HEIs to consult on the action plan, and to seek approval for this plan through the institution's governance structures.
- iii) Annex 5 paragraph 3d suggests that Institutional Review teams will expect to have provided as a matter of course the minutes and papers of the deliberative and management bodies concerned with issues of quality and standards, at both central and local levels. If read literally this would represent a huge additional burden for HEIs in compiling the documentation for Review teams, resulting in a volume of material that a team could not hope to process. The reference needs to be much clearer and more specific.
- iv) The suggestion that Review teams could meet with External Examiners is a potential issue. It is difficult to see what their role is expected to be in such a situation, and it is possible that their impartiality could be questioned following participation in Review on the institution's behalf. Review teams already have access to their written reports and the institution's responses. It is also an additional imposition on Examiners who are not well-paid for their work, and may increase the difficulties in recruiting examiners already experienced by small and specialist institutions. Expectation of detailed engagement with the Academic Infrastructure at individual lecturer level and with recent graduates is also potentially unrealistic and costly.
- v) The proposals no longer include the current provision for the institution to offer a response to the report; this facility is replaced by an Action Plan. We consider that the opportunity for an institution to offer its perspective on a report is important and that the response may, on occasion, provide stakeholders with a useful interpretative context which would enrich their understanding of the report. We would therefore urge that the facility for an institution to respond to the report be retained. The response might be structured as an Action Plan and Other comments.
- vi) We note that, once a Review has been formally 'signed off' with a passing judgement, institutions will be permitted to place the QAA logo as a kitemark on their website. Provision should be made for those institutions scheduled later in the Review cycle to display the QAA kitemark, otherwise they will be severely disadvantaged in recruitment of students. We would suggest that all institutions which have received a 'confidence' judgement under the current method should have the right to display the kitemark pending their Review under the new method.
- vii) We note that, under the proposals, the recommendations will not be differentiated as necessary, advisable and desirable. We consider the differentiation of recommendations as helpful both to institutions and to stakeholders by clarifying the

significance of the recommendations. The consultation document acknowledges that 'desirable' recommendations are different in kind from 'advisable' and 'necessary' recommendations, yet, under the proposals, this fundamental difference would appear not be acknowledged. We are concerned that, due to the lack of differentiation, reports may be misconstrued and incorrect inferences drawn.

- viii) There is an assumption about the quality of the student written submission which is not justified by experience to date.
- ix) We note that, under the proposals, Review panels will explore the 'usefulness of [programme specifications] to students'. Experience suggests that programme specifications are more commonly used by staff for purposes of quality management, and that students would normally use other sources for information about their programme, and would refer to programme specifications as a last resort. We suggest that this provision in the proposals be reviewed.
- x) The proposal that the audit visit should be 3-5 days is not credible, given the suggestion that this period should also include several extra meetings listed in the consultation. Planning for, bulleting, having meetings, team review of evidence, and agreeing the provisional judgements and findings will then leave no time for any evidence gathering, which already suffers by comparison in the present methodology. In particular no justification is given for introducing additional student meetings. These will be problematic, since with the possible exception of Student Union representatives, students' perceptions are largely based upon degree experience within their own discipline, and do not generalise to the institution as a whole, or provide statistically reliable evidence.
- xi) A one day briefing meeting is not realistic logistically (in view of the travel distance required for some auditors) and will be damaging to the team dynamic and development of group working practice. If the briefing visit has to be cut down, a private afternoon Audit team meeting, overnight stay, and then a morning meeting with the institutional representative is likely to be more practicable and effective for most auditors. More use should be made of video and phone conferencing, which can be very effective once the Audit team has met face-to-face and got to know each other. QAA should invest and train auditors in the use of professional teleconference meeting software such as GoToMeeting, which could generate significant time and cost savings compared with physical meetings. Present experience of travelling to other sites to attend videoconferences as part of Audits suggests that QAA has not yet seriously explored this issue.
- xii) Responsibility for drafting the summary report written specifically for public readership should lie with QAA, not the Audit team. QAA cannot expect auditors or audit secretaries who are employed by the QAA to deliver technically accurate and detailed analysis of Audit data, to also produce copy which conforms to a corporate communications policy for public readership (there is in any case a risk that this output will be so bland as to be empty of understandable content).