

## **Future arrangements for quality assurance in England and Northern Ireland**

The following is the 1994 Group's response to the HEFCE consultation on the future arrangements for quality assurance in England and Northern Ireland (HEFCE 2009/47). 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.

### **Consultation question 1: Do you agree that the principles in paragraph 31 are broadly the correct ones on which the revised quality assurance system should be based?**

While the proposed principles in paragraph 31 are in many ways appropriate, some clarification and amendments are required:

- > There should be a more prominent statement included within the principles for the national quality assurance system, which recognises the status of higher education institutions (HEIs) as autonomous awarding bodies responsible for the management of their own quality and standards within a framework set by the national quality assurance system.
- > It should also be made explicit that the broad statement that the system should 'meet the needs of the funding bodies and of institutions' (point (c)) incorporates the needs of staff in the latter.
- > Documentation and public information about the quality assurance system needs to be consistent in the use of terminology, and be aware of the changes in emphasis indicated by, notably: quality assurance framework/quality assurance system, quality enhancement/quality improvement. Furthermore the term 'standards' appears to be used to mean different things.
- > We would like the new process to be clear about its purpose, which is to confirm the rigour and validity of internal processes to secure standards and improve the student experience at HEIs. It should also highlight that regulations, employer engagement and external expert engagement in approval and monitoring of provision and services, and professional, statutory and regulatory bodies (PSRBs) are a standard

part of HEI internal processes; the review process is not the only external engagement HEIs have.

- > In order to 'command public, employer and other stakeholder confidence', (point (b)) the independence of the process should be made more transparent, for example, the training and externality of the auditors should be made explicit to non-experts.

**Consultation question 2: Do you agree that the objectives set out in paragraph 32 are the correct ones for the revised quality assurance system to meet?**

We broadly agree with the objectives set out in paragraph 32, but believe that these may require reconsideration or amendment to take account of the need to recognise the centrality within the principles for the quality assurance system of the nature of HEIs as autonomous awarding bodies and the obligations of HEIs that result from this:

- > The unqualified reference to 'meeting public expectations' (point (a)(ii)) needs some expansion. It implies that there is a known and perhaps consistent set of expectations, but in reality such expectations are likely to be hugely variable within and across 'stakeholder' groups. Moreover, it is important to ensure that 'comparability' with reference to public information recognises the heterogeneous nature of HEIs and does not assume a 'one size fits all' approach.
- > Point (b)(iii), 'assure the threshold standards', implies an outcome rather than process orientation, and has significant implications for the audit methodology and for individual HEIs. These implications need to be recognised more explicitly. Threshold standards, as articulated by the Framework for Higher Education Qualifications (FHEQ), could be demonstrated to be comparable, but it is neither possible nor desirable to have a universal standard or expectation of content.
- > It would be helpful to acknowledge the role of quality assurance as contributing to the enhancement of learning and teaching, as another pair of 'distinct but interlinked concepts' (point (g)(iii)).
- > In point (g)(vii), whilst we support the need to maintain flexibility, we would welcome a discussion of how, and by whom, 'public priorities' are identified; and how equity between HEIs will be maintained in applying changing priorities to the audit process, (i.e. how the process will ensure that impact is consistent across institutions in instances where some may have undergone review prior to the identification of a particular priority). We would like the objective 'meet[ing] changing demands and public priorities' to include providing guidance to HEIs (e.g. through the Code of Practice) as well as being able to review these developments effectively.
- > We welcome the reiteration of previous HEFCE policy that quality assurance processes should 'avoid disproportionate use of institutional effort and resources'. In particular we welcome HEFCE and QAA's continued commitment to dialogue with PSRBs to avoid duplication of effort (point (g)(viii)). There has been increased alignment between some professional body standards and subject benchmarks, and use made in the accreditation process of other parts of the Academic Infrastructure such as Programme Specifications and FHEQ award descriptors. We would like HEFCE and QAA to encourage PSRBs to actively seek to work in partnership with the validation/periodic review processes operating within HEIs and to hold conjoint events where possible.

- > It is critical that the revised system does not cause a redirection of funds from front-line teaching activity; it must be efficient and proportionate, and reduce the financial, regulatory and administrative burden that is placed on HEIs.

**Consultation question 3: Do you agree that the broad characteristics set out in paragraph 38 are the right ones to consider when revising the institutional audit method?**

We support the broad characteristics, set out in paragraph 38, in general, however we have the following questions:

- > Whether the audit methodology will become more outcomes- rather than process-orientated?
- > In relation to characteristic (a), how will this be applied equitably within a rolling programme of reviews?
- > How might 'comparability of threshold standards' (characteristic (d)) be achieved in practice?

We will respond in greater detail to the key characteristics in our responses to consultation questions 4 to 7.

**Consultation question 4: Do you agree that institutional audit should be more flexible, focusing both on key areas common to all institutions, plus additional topics to be determined as necessary?**

We support the need for increased flexibility over time within the Institutional Audit process. However, we wish changes to be taken on the basis of sound evidence, and following careful consideration, including whether they conflict with characteristic (e) in relation to developing a method that is of 'no increased overall level of demand'.

We would suggest a process that involves an audit of a common core of activity, which tests and makes judgements upon the threshold standard, with a more flexible aspect, focused on themes, and not linked to judgements, thereby ensuring comparability remains possible.

We are of the opinion that public interest should not entirely drive themes, but that they should also be identified by the sector.

In addition to incremental changes over time to the Audit process, we think the current practice of periodically reviewing the process from first principles (for example every six to 10 years) should be retained.

**Consultation question 5: Do you agree that the QAA should be asked to consider how comparability of standards might be better addressed in institutional audit and the Academic Infrastructure?**

We believe that the issues raised in relation to standards can best be addressed by improving and publicly explaining the mechanisms already in place. We therefore support the suggestion in the consultation document that QAA should be asked to consider the role that the Academic Infrastructure plays in assuring broad comparability of standards. We would also support asking QAA to consider how the broad comparability of academic standards could be more effectively addressed through Institutional Audit.

However, the sector should provide assurance (both to its stakeholders and to itself) of the broad comparability of academic standards, rather than direct comparability, without

returning to subject-review, which was costly, time-consuming and ineffective at demonstrating comparability.

We believe that diversity is an essential part of what makes UK HE distinctive and attractive, and it is essential that we have quality assurance procedures which are capable of recognising and supporting distinctiveness.

**Consultation question 6: Do you agree that the QAA should be asked to review the terms it uses to describe the different levels of confidence expressed in audit judgements?**

We recognise that phrases such as 'limited confidence' are not always readily understood by a wider audience. We appreciate the care taken in the wording of the current judgements to ensure that they remain valid for the life of the audit cycle, and the additional need to avoid their rendition as metrics that subsequently appear in press league tables. We would wish these same considerations to underpin any proposed changes.

QAA could be asked to consider whether other judgements could be made, e.g. approved/not approved, possibly accompanied by a more detailed commentary, or time-limited judgements, however, we would not support a return to grading/scoring, nor the extension of the scale beyond three. We believe that extending the points on the judgement scale above three would result in a disproportionate incentive to chase the highest grade, possibly diverting front-line spending inappropriately.

**Consultation question 7: Subject to sector agreement on the data that the institution makes available to inform prospective students and other interested parties about the quality of its educational provision and the standards of its awards:  
Do you agree that institutional audit should make a judgement about the reliance that can reasonably be placed on the accuracy and completeness of this information?**

We are of the opinion that current procedures, whereby Institutional audits comment on published data and other material, are adequate. The sector as a whole should, however, consider how data that already exists could be made more easily available and comprehensible to the public.

However, if it is agreed that Institutional Audit move from making a comment to a judgement in this area, then clear agreement on the dataset that is to be audited will be needed. The current work to agree the new requirements for published information will need to reach sector-wide agreement, and be based on clear evidence of stakeholder need. We therefore welcome the statement that this judgement would not apply from the beginning of the new method from 2011, given that the consultation is not happening until 2010-11.

It is also important that these requirements do not impose a disproportionate administrative burden on HEIs. Furthermore, we re-iterate the point made above of the need to avoid the use of the dataset to create league tables, which might in turn result in a disproportionate incentive to chase the highest position, possibly diverting front-line spending away from teaching.

**Consultation question 8: Do you agree that the QAA should provide summaries of institutional audit reports for a non-specialist audience?**

We endorse the need for the sector to engage more effectively with stakeholders in explaining the robust framework and processes that are in place to assure academic quality and standards. However, the subtlety of the vocabulary used in versions of reports designed for institutional use should not be lost for the sake of public accessibility.

We would recommend simpler language being used in the report, and the provision of a short executive summary which highlights the judgement and key findings in plain English. A plain English definition of terms could also be useful.

**Consultation question 9: Do you agree that institutional audits should be organised on a rolling basis rather than in a fixed cycle?**

**Please add any comments. In particular, if you agree, what would be your definition of a minor change to procedure, compared to a more substantive revision?**

We support the proposal that Institutional Audit might be organised on a rolling basis, on the proviso that the sector would be consulted on major changes to procedure, as was the case for the removal of Discipline Audit Trails under the previous cycle.

A minor change might be the introduction of a new topic. Examples of major changes would be any change in the manner in which judgements and recommendations are expressed; a different approach to peer review team composition; a change to the structure of audit engagement (e.g. if the intensive week-long model were replaced by an extended model used by Degree Awarding Panels, which includes participation in HEIs' committee and Board meetings).

**Consultation question 10: This document has set out a number of ways in which we might improve the quality assurance system, to make it more accountable, rigorous, transparent, flexible, responsive and public-facing. Is there more that we might do? If so, please give details.**

It is important that the QAA considers the way in which it engages with the public, but we see this sitting alongside the need for HEIs to explain in clear and accessible terms the ways in which their individual quality assurance mechanisms operate.

Some of our member institutions have made suggestions for consideration:

- > The revised method should feature a strengthening of training for members of audit teams, to ensure that the revised methodology is implemented as consistently as possible across HEIs.
- > Consider the usefulness of quality assurance processes for HEIs, not just external audiences.
- > Consider the momentum the enhancement focus had taken on in the current cycle and how it will be affected by the proposed changes.
- > Further thought needs to be given to the perceptions of those outside the sector of the relationship between the funding councils, the representative bodies for HEIs and QAA, and the independence of QAA, as part of the follow-up to the review of the QAA in 2009 by the European Association for Quality Assurance in Higher Education.
- > Encourage the QAA to go further on student involvement in quality assurance and embed this within the QAA Code, for example the current review of the Academic Infrastructure should include consideration of how student engagement in quality assurance at institutional level can be more effectively embedded within relevant aspects of the Infrastructure.