

A risk -based approach to quality assurance: HEFCE Consultation May 2012/11

Response submitted on behalf of GuildHE by Helen Bowles, Deputy Chief Executive Officer and Policy Adviser, 30 July 2012

1a. Please comment on the extent to which you consider that the agreed quality assurance system and HEBRG principles, set out above, provide an appropriate basis for a more risk-based approach to quality assurance.

We note that the document identifies three fundamental principles which underpin the approach to a more risk-based approach to quality assurance in addition to the principles and objectives for quality assurance as agreed for England (and Northern Ireland) in 2010 and the HEBRG principles, which serve a rather different purpose.

We very much welcome the intention to retain a universal quality assurance system which builds on the existing system in retaining the key features of peer review and use of judgement with the strong involvement of students in the process. We see no reason to dissent from, or add to, the previously agreed principles and objectives. However, we would like to see the proposals put forward in the consultation assessed more systematically against the principles and objectives agreed in 2010.

1b. Are there any other principles that should apply?

See above

2a. In the pursuit of a more risk-based approach to quality assurance, the consultation proposes that the extent, nature and frequency of external quality assurance should vary according to the track record and scope of the provision of the higher education provider. Do you agree?

Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree

2b. Please explain the reasons for your answer.

We agree that the extent, nature and frequency of external quality assurance should vary according to the previous record and scope of provision of the higher education provider. However, we have reservations about the way in which it is proposed that this approach might be implemented.

In particular we feel that the distinction drawn between providers on Route A and those on Route B is unnecessary and would rapidly break down in practice. We suggest it should be possible to implement a system in which the length of time between reviews varies without a need to label institutions as being Route A or Route B. The same effect might be achieved, for example, by providing that institutions which, for whatever reason, had not (successfully) undergone two full institutional wide reviews should be subject to full review within a pre-determined period of time. This would enable the quality assurance system to respond to the changing higher education environment and the changing circumstances of individual institutions as necessary. It would also allow for the greater flexibility needed in a system which will accommodate both a schedule of reviews and the possibility of out of cycle reviews.

In addition, we would like to see further consideration given to the balance between the frequency of reviews and the extent and nature of an individual review. This links with the core and module process as discussed further below.

On a separate point, we would be glad to have the opportunity to discuss how far review for the purposes of applying for (or retaining as appropriate) Taught or Research Degree Awarding Powers might fit with the proposed pattern of review activity. Our expectation would be that the process of assessment for degree awarding powers would be considered equivalent, in terms of rigour and the demands made on the institution, to a full institutional review.

3a. Do you consider that establishing within Institutional Review a core review process and additional modules for particular types of provision (for example on elements of collaborative provision) would help with achieving the risk-based approach to quality assurance?

Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree

3b. Please explain the reasons for your answer.

Although we are expressing agreement in principle, we feel it is difficult to comment with any confidence without more information on how this might work in practice. Collaborative provision appears to be the main area suggested as the focus for an additional module, with some mention also of distance learning programmes, branch campuses or joint ventures. We feel it is important that where an institution has a significant amount of provision delivered in partnership – whether the institution is the awarding or the delivering body – it will be important to allow sufficient time and resource within the review period to address that in sufficient detail. If that is essentially the intention in having an additional module, and it is not thought that can be achieved in any other way, then it may be an appropriate way forward. In this case it would be important to be clear about the scope of the module activity and whether, for example, separate judgements would apply for core and module.

However, we note that for many institutions collaborative activity is embedded in the core activity of the institution. To that extent it would need to be covered in the core review process. The same would apply where learning is delivered across more than one campus or through for example distance learning.

We wonder therefore whether it might not be possible to tailor the process of review more closely to the extent and nature of provision at any one institution and achieve a more risk based approach through that means. If, for example, institutions could be invited to provide preliminary information about the nature and extent of their provision, at a fixed point in advance of a scheduled review, the length of time allowed for the review and the number of reviewers might be adjusted accordingly. There is some element of this in current arrangements but we feel that there may be scope to take it further in the interests of achieving a more truly risk based approach.

4a. Please indicate, for providers with a longer track record, on Route B, what should be the interval between external QAA institutional reviews, ranging from six to ten years.

As noted above, we have reservations in principle about the proposed division into Route A and Route B. However, in looking at the maximum and minimum intervals between reviews, we remain unconvinced that a gap of much more than 6 or 7 years is desirable. We recognise that this is broadly in line with the current pattern and are looking to other means of achieving a more risk based approach. We are clear, however, that retaining an interval of 6-7 years between reviews for institutions with an established track record but then adding, over and above that process, new arrangements for annual monitoring would add substantially to the overall burden. This would seem contrary to the Government's intentions as set out in the White Paper. As set out below, we would hope, therefore, that the proposals for additional annual monitoring could be revisited.

4b. Please explain the reasons for your answer.

The elements of the underpinning principles which relate to providing timely information, meeting the relevant needs of all students and supporting a culture of quality enhancement are particularly relevant here. We note that a period of 6 years would encompass two cohorts of students on a traditional three year full time honours degree programme. Stretching the interval to 9 or 10 years would cover 3 cohorts – and more if students were to be on programmes of two years or less. Our feeling is that review carried out once every 6 years or so might better meet the needs of students and the wider public. In discussion with students, we note that they appreciate the opportunities for engagement offered by a scheduled review over and above the normal arrangements for engagement in internal quality assurance processes. Although the provision made for students to ‘trigger’ a review might also be presented as an opportunity for engagement we feel that this would lend itself to a very different form of interaction which could have less positive outcomes in the longer term.

With a longer interval between reviews we would also have concerns about the widening gap between quality assurance arrangements in England and those which apply in other parts of the UK.

We feel that the implications for the reputation of higher education in England need to be taken into account as do implications in a wider European context as set out in the consultation document.

5a. Please indicate, for providers with a shorter track record, on Route A, what should be the interval between external QAA institutional reviews. Bearing in mind the need for there to be a relationship between the review intervals of the two routes, do you have a view about the minimum or maximum interval between reviews on Route A?

See below

5b. Please explain the reasons for your answer.

We note these questions assume a need for there to be a relationship between the review intervals for the two ‘routes’. As noted above, we have reservations about this approach precisely because of the lack of flexibility it affords. However, assuming review for those with a track record of at least two full reviews is at intervals of around 6-7 years, we would suggest that for those with less experience of delivery of higher education, or less of a track record in proving their ability to manage quality and standards through full institutional review, scheduled review at a maximum of four or five years might best meet the principles and objectives of the system.

We note however, that there is no separate question about arrangements for progress monitoring between reviews. We would welcome therefore further discussion about the balance of activity between the full review process – with or without additional modules – and arrangements for what was formerly termed mid-cycle review.

5c. Given the evolution of the quality assurance system, most further education colleges with higher education provision will be reviewed according to Route A initially. Should these providers have the option to undertake an early review during 2013-15 so that they may be able to transfer more quickly to Route B?

Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree

Given our reservations about the division lines drawn up between Routes A and B we are not offering any views on this proposal. However, we suggest it might be made more explicit in any new system whether HE providers that subscribe to the QAA have the right to request bringing forward a review, and the circumstances in which that might apply.

6a. Should – and, if so, how might – the QAA seek to streamline or modify its external review activities for those providers which have a substantial proportion of their provision accredited by PSRBs?

Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree

6b. Please explain the reasons for your answer.

The suggestion that QAA could co-ordinate activity with relevant PSRBs so as to avoid duplication and streamline procedures and processes is not new. It features both in the 2010 principles and objectives and in the HEBRG Concordat. Progress has already been made in some areas. However, given the extent to which PSRBs differ in their scale of activity and areas of interest, implementation has not been straightforward. The question of ‘how’ it might be done is therefore critical. We suggest it might need to be worked through on a case by case basis for key areas of PSRB activity.

We note also that if it is decided to move to longer intervals between QAA reviews, further work might need to be done on how this might be viewed by those PSRBs who currently draw on the outcomes of QAA review.

7a. What form of annual assessment of key quantitative and qualitative data could be undertaken to determine whether there are grounds for any out-of-cycle investigations, which may or may not lead to some kind of formal review?

We have severe reservations about the proposals set out in the consultation for an annual assessment of key qualitative and quantitative data. We feel that this does not sit well with the stated aim of reducing external regulation – it seems rather to add an additional layer of bureaucracy

without necessarily adding value. We note the intention to rely as far as possible on existing data rather than commissioning new data – but feel that the proposed use of the data provides at best a very blunt tool for any formal assessment of quality and standards.

Little information is provided about the composition of the proposed external Panel beyond reference to the fact that it would need to operate in a transparent fashion and that the membership ‘would need to be considered careful to avoid there is no possibility for a conflict of interest to arise’.

We anticipate that the Panel would need a high level of expertise and knowledge of the sector if there is to be confidence in its ability to interpret the data and set it in context. We are not sure how far in practice this might be compatible with the emphasis placed on ensuring independence. We take the point made in the consultation about the extent to which some of the proposed data lacks immediacy by the time it is published. We note that this is compounded by the fact that the Panel might need to look at trends over a period of time. There are separate problems in use of data, and the variability of data year on year, for smaller student cohorts.

Our understanding is that there are currently no plans to allow for discussion of any apparent anomalies or disparities with the institution concerned. Clearly if there were to be interaction with the HE provider there could be a risk of the work of the Panel turning into some kind of mini review activity. However, without any such exchange there will be no knowledge of any steps the institution has already taken to identify and deal with perceived problems or issues. Any referral to the QAA to investigate further could therefore be seen as an excessive reaction to a problem already addressed.

The consultation also flags the difficulties in reviewing data for the full range of HE providers that subscribe to the QAA - including those that do not currently subscribe to HESA and do not participate in the NSS or the DLHE. We note the Government's intentions, as set out in its response to the White Paper and Technical Consultation, to bring alternative providers into the quality assurance framework operated by the QAA. Our assumption is that a key concern is to enable HEFCE to exercise responsibility for assuring the quality of all provision where students have access to public funding (whether at course or institutional level). It will be important therefore to be clear on the availability and consistency of the data to be used for the purpose as it applies to all relevant HE providers.

For all of these reasons, we are concerned that the proposals could be damaging to the diversity of both HE provision and HE providers. Given that other arrangements are in place to trigger reviews where there are serious concerns about the quality of provision or the standards of awards we would hope that reliance could be placed on these without setting up a parallel process.

In practice, if one outcome of the current consultation were to be to retain institutional review, for institutions with an established track record, at intervals similar to those that apply at present, we would hope this might remove the perceived need for an additional annual monitoring process.

If, however, it is determined that the different systems are to run alongside each other, we would want to see clear lines of responsibility and decision making. In particular, while recognising HEFCE's interests in assuring quality, we would emphasise the need to secure the operational independence of the QAA. Although in exceptional cases the HEFCE Accounting Officer might feel the need to

commission a review, we suggest that decisions on whether full review is necessary, whether under the Causes for concern process, or other arrangements, should normally rest with the QAA.

7b. Are there any other data or information sources that the panel should consider?

See above

8. Do you have any other comments on this document or further suggestions for what we might do?

As noted above, GuildHE is strongly supportive, in principle and in practice, of giving students a prominent role in assessing their own academic experiences. However, we would want to see further consideration given to the kind of support to be offered to students, including those in the smaller student unions.

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