Outcomes of QAA consultation on Higher Education Review

1 Overview of the consultation

The Quality Assurance Agency for Higher Education (QAA) consultation on Higher Education Review was based on the consultations on Institutional Review of higher education institutions in England and Northern Ireland (IRENI) and Review of College Higher Education (RCHE), and it took into consideration the intention to have a more risk-based review approach.

In January 2013, a circular letter inviting contributions was sent from QAA's CEO to QAA subscribers in England; higher education providers in England with access to funding from the Higher Education Funding Council for England (HEFCE); higher education providers in Northern Ireland with access to funding from the Department for Employment and Learning in Northern Ireland (DELNI); representative bodies of higher education providers in England; higher education student representative bodies; other higher education sector bodies; professional, statutory and regulatory bodies (PSRBs); and employer bodies.

2 Key points

Key points to emerge from the consultation are as follows (based on cleaned data):

- nearly three-quarters of respondents felt there should a judgement of 'requires improvement to meet UK expectations' in the area of threshold academic standards
- 86 per cent of respondents felt that an initial appraisal should be used to tailor the intensity of individual review visits
- views on the possible use of international reviewers were very mixed and the questions prompted a lot of free text responses
- there is concern that much of the language employed is unhelpful and, despite the draft handbook stating that 'the intensity of the review visit is not in any way a judgement about the provider's higher education provision', many respondents feared it would be interpreted as such
- there is resistance to the idea of linking scale of provision to review intensity
- there is criticism of the proposal to specify a 'provisional level of confidence'
- there is concern that one-day visits would not be sufficient
- nearly 90 per cent of respondents considered that provider self-evaluation documents should have a bearing on the initial appraisal
- 84 per cent of respondents indicated that student submissions should have a bearing on the initial appraisal
- 85 per cent of respondents considered the concept of high, medium and low-intensity review visits to be appropriate
- more than 90 per cent of respondents thought it appropriate for professional support staff to be reviewers.

3   Consultation overview (based on cleaned usable data)

One hundred and twenty-seven participants provided responses to the online consultation and seven responses were received via email, providing a total of 134 respondents.
This compares with 149 responses to the IRENI consultation in 2010 and 62 responses to the 2011 consultation on RCHE.

In addition to responses to multiple-choice questions, significant narrative was provided. One reply was in the form of narrative only, with no question-by-question responses. It is therefore excluded from the detailed question-by-question summaries, but is included in the overall consideration of the issues. Thus, 133 is the maximum response total per question, apart from the opening section concerning names, organisations and roles, where the maximum response level is 134.

The majority (118 respondents) responded on behalf of an organisation. There were 18 responses from individuals. Seventy-two responses were from staff in higher education institutions, with the other categories being fairly evenly split. More than half of the respondents were from universities or colleges.

The consultation consisted primarily of closed questions, using tick-box responses, but there was ample opportunity to provide comments and to respond to some open-ended questions. The responses to these provide rich information about the perceptions of respondents in regard to the proposed process.

The consultation emphasised the importance of using a risk-based approach and the need for flexibility of operations, for enhancement and for student engagement. However, given the profile of respondents, caution has to be exercised when interpreting the results.
For example, no parents or careers advisers responded. In addition, some other categories had very low response levels, such as prospective student (one), student (five), student representative (six), and QAA reviewer or review secretary (seven).

The consultation was structured around the following themes:

- judgements
- initial appraisal
- reviewers and review teams
- managing higher education with others
- the initial appraisal in more detail
- the review visit in more detail
- the review team
- keeping the method under review
- the role of students.

4 Responses in detail (based on cleaned usable data)

4.1 Respondent type

The first page of the consultation was about names, organisations and roles, and these are summarised in Tables 1 and 2.

Table 1: Respondent type

Are you responding to this consultation:	Response (%)	Response (count)
a) as an individual?	13.4%	18
b) on behalf of your organisation?	86.6%	116
answered question		134
skipped question		0

Table 2: Respondent role

Which of the following best describes your role?	Response (%)	Response (count)
Student	3.9%	5
Prospective student	0.7%	1
Student representative	4.6%	6
Staff in a higher education institution	51.6%	69
Staff in a further education college	12.4%	16
Staff in a higher education sector body	7.8%	10
Parent	0.0%	0
Careers adviser	0.0%	0
QAA reviewer or review secretary	5.2%	7
Other (please specify)	13.7%	18
answered question		133
skipped question		1

4.2 Judgements

Table 3 shows that over 70 per cent of respondents suggested that there should be available a judgement of 'requires improvement to meet UK expectations'.

Table 3: New judgement on standards

Q1 Should a judgement of 'requires improvement to meet UK expectations' be available in the area of threshold academic standards?	Response (%)	Response (count)
Yes	72.5%	85
No	27.5%	32
answered question		117
skipped question		16

4.3 Initial appraisal

Table 4 shows that 86 per cent of respondents considered that an initial appraisal should be used to tailor the intensity of individual review visits.

Table 4: Tailored initial appraisal

Q2 Should an initial appraisal be used to tailor the intensity of individual review visits?	Response (%)	Response (count)
Yes	86.3%	104
No	13.7%	16
answered question		120
skipped question		13

4.4 Reviewers and review teams

Table 5 indicates that nearly 60 per cent of respondents felt that the process should involve international reviewers.

Table 5: Involving international reviewers

Q3 Should the process involve international reviewers?	Response (%)	Response (count)
Yes	59.8%	68
No	40.2%	46
answered question		114
skipped question		19

Table 6 shows that nearly 70 per cent of respondents considered the pilot proposal to be a reasonable way to introduce international reviewers.

Table 6: Introducing international reviewers

Q4 Does the pilot proposal offer a reasonable way to introduce international reviewers?	Response (%)	Response (count)
Yes	68.2%	76
No	31.8%	35
answered question		111
skipped question		22

Question 5 invited free-text, brief suggestions about introducing international reviewers. There were 112 responses. Views ranged from 'qualified yes' to 'absolutely not' in regard to the proposal to introduce international reviewers. There were no unqualified 'yes' responses in the free text, thus Figure 1 provides an overview of the top-line responses. The main issues raised about the introduction of international reviewers are categorised in Table 7. Response counts will not total to 112, as some responses contained multiple issues.

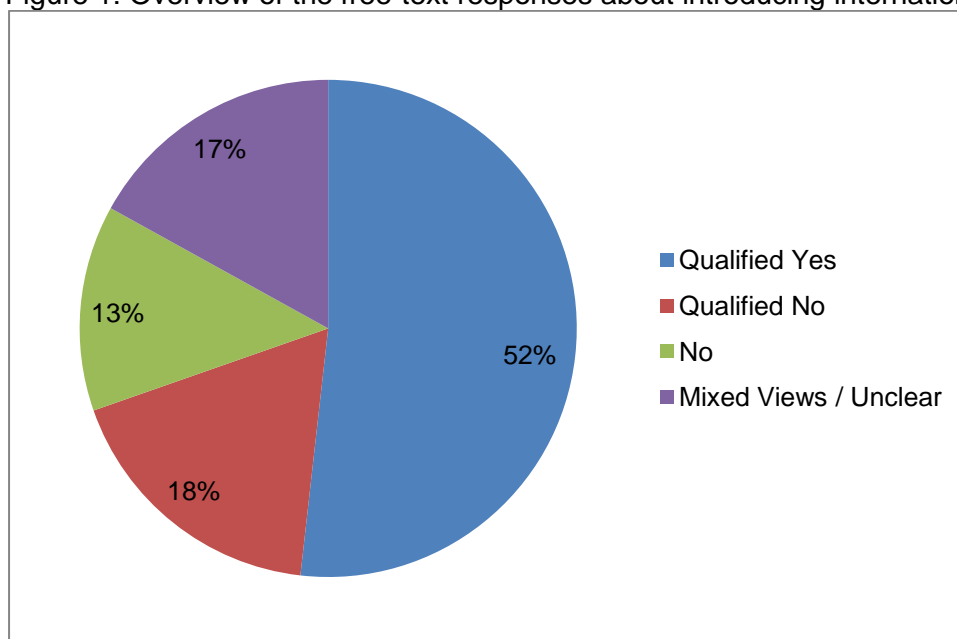Figure 1: Overview of the free-text responses about introducing international reviewers

- Qualified Yes — 52%
- Qualified No — 18%
- No — 13%
- Mixed Views / Unclear — 17%

Table 7: Main issues about the introduction of international reviewers

Issue	Number of responses
Lack of familiarity with UK higher education/UK Quality Code for Higher Education	48
Cost	31
Training	26
No perceived benefit	20
Language barriers	7

One particular challenge arises with the issues of UK Quality Code for Higher Education familiarity and training. The arguments are along the lines that it is essential that international reviewers should be thoroughly familiar with UK higher education ways of working and its nuances. In other words, they should be identical to existing UK reviewers. If such a position were reached, the benefits of having international reviewers, such as critiquing systems from fresh angles, might be nullified, which provides a particular challenge in this area.

4.5   Managing higher education with others

Table 8 shows that almost 87 per cent of respondents considered that the proposals for the review of arrangements for working with others establish an appropriate demarcation between the areas reviewed at a degree-awarding body and those reviewed at the partner, delivery or support organisation. Table 9 shows that nearly 60 per cent of respondents indicated that there should be a separate judgement about managing higher education provision with others.

Table 8: Proposals for the review arrangements for working with others

Q6 Do the proposals for the review of arrangements for working with others establish an appropriate demarcation between the areas reviewed at a degree-awarding body and those reviewed at the partner, delivery or support organisation?	Response (%)	Response (count)
Yes	86.7%	96
No	13.3%	15
answered question		111
skipped question		22

Table 9: Separate judgements for managing higher education provision with others

Q7 Should the new method include a separate judgement about managing higher education provision with others?	Response (%)	Response (count)
Yes	58.6%	65
No	41.4%	46
answered question		111
skipped question		22

4.6   The initial appraisal in more detail

Table 10 indicates that almost 60 per cent of respondents considered the proposed scale and provisional level of confidence appropriate for the initial appraisal to determine the intensity of the review visit.

Table 10: Proposed scale and level of confidence for the initial appraisal

Q8 Is the proposed scale and provisional level of confidence appropriate for the initial appraisal to determine the intensity of the review visit?	Response (%)	Response (count)
Yes	58.5%	62
No	41.5%	44
answered question		106
skipped question		27

Table 11 shows that nearly 70 per cent of respondents felt that the proposed approach to determining the scale of the provision is appropriate.

Table 11: Determining the scale of provision

| Q9 Is the proposed approach to determining the scale of the provision appropriate?	Response (%)	Response (count)
Yes	68.0%	72
No	32.0%	34
answered question		106
skipped question		27

Table 12 indicates that almost 65 per cent of respondents considered the proposed approach to determining the level of confidence to be appropriate.

Table 12: Determining the level of confidence

Q10 Is the proposed approach to determining the level of confidence appropriate?	Response (%)	Response (count)
Yes	64.8%	68
No	35.2%	37
answered question		105
skipped question		28

Figure 2 (question 11) shows that just less than 50 per cent of respondents considered that information used to identify the level of confidence should remain the same, with just over 30 per cent indicating that changes should be made in some way (but not information being enlarged or reduced as the main issue).

Figure 2: Q11 Information used to identify the level of confidence
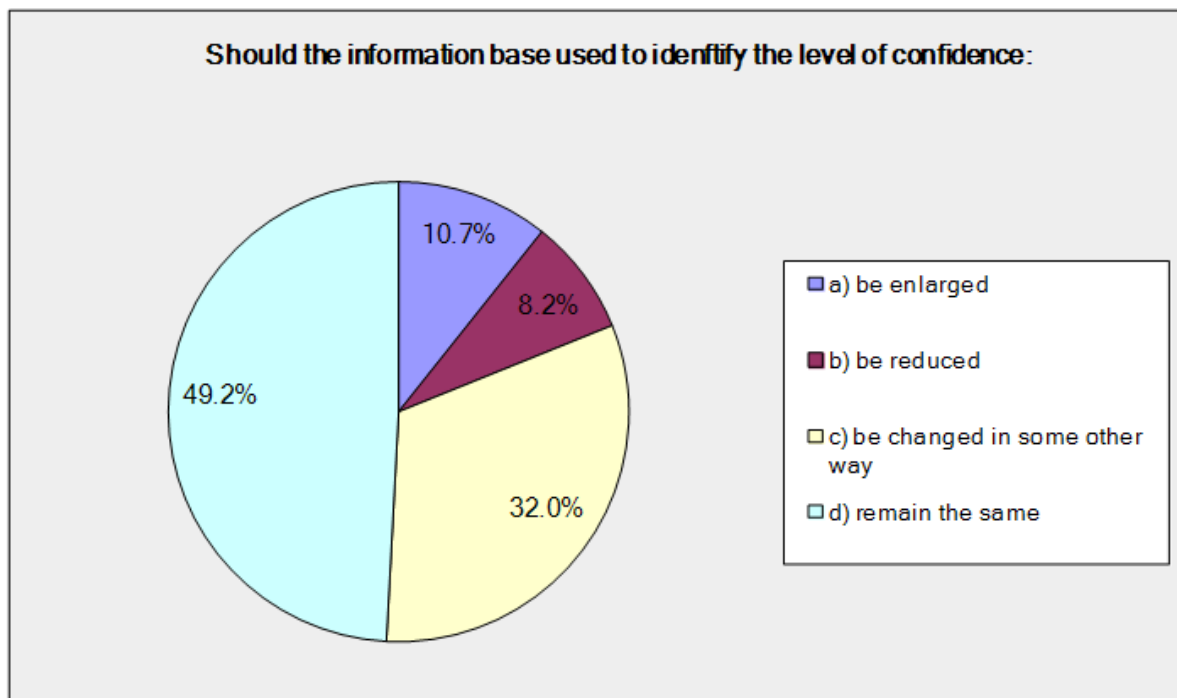
Question 12 invited free-text, brief suggestions about changes relating to the information base. There were 85 responses. Some responses addressed multiple issues.
Table 13 shows responses for which there were at least two respondents.

Table 13: Free-text responses about changes relating to the information base

Response	Number of responses
Reduce the data provision burden and make better use of existing sources, longitudinal data, track records and reports from other bodies (such as the Skills Funding Agency (SFA), PSRBs, General Medical Council (GMC), Ofsted, National Student Survey (NSS) and Destinations of leavers from Higher Education survey (DLHE)) appropriate to the provider and in advance.	21
Too much significance placed on existing reports from other bodies (such as SFA, PSRBs, GMC, Ofsted, NSS, DLHE) not appropriate for some providers.	10
Use of media coverage to help determine the intensity of a review is a major concern.	15
Unhelpful language, especially 'intensity', 'confidence' and 'risk'.	13
Institutions should be able to provide supplementary information of their choice to assist reviewers' understanding of institutions' approaches to the management and delivery of higher education against the Expectations in the UK Quality Code for higher Education, and providers should be able to discuss this with reviewers.	10
Action plans from the last review, actions taken as a result and annual monitoring should be part of the information base.	14
Risk does not relate to volume, and visits and consideration should be as short as is needed to be fit for purpose.	13
Not clear what the provider needs to give in terms of evidence, timings and weightings of different types of information. These could be very important.	12
Provisional levels of confidence in advance of the review visit implies that a judgment has been reached prior to the visit, and that is not appropriate.	10
Self-evaluation document should be included as part of the initial appraisal.	9
Self-evaluation document should not be included as part of the initial appraisal.	4
Spread of subject areas, campuses and collaboration are major risk factors.	6
Key Information Set is flawed and information from provider websites problematic.	6
Student submissions should be included as part of the initial appraisal.	5
Student submissions should not be included as part of the initial appraisal.	4
There should be moderation of initial appraisals for consistency.	2
The National Union of Students and QAA should help develop students' unions to evaluate quality assurance and enhancement processes annually.	2

Table 14 indicates shows that nearly 90 per cent of respondents felt that provider self-evaluation documents should have a bearing on the initial appraisal.

Table 14: Provider self-evaluation documents and the initial appraisal

Q13 Should provider self-evaluation documents have a bearing on the initial appraisal?	Response (%)	Response (count)
Yes	87.8%	80
No	12.2%	26
answered question		106
skipped question		27

Table 15 shows that 84 per cent of respondents considered that student submissions should have a bearing on the initial appraisal.

Table 15: Student submissions and the initial appraisal

Q14 Should student submissions have a bearing on the initial appraisal?	Response (%)	Response (count)
Yes	83.5%	76
No	16.5%	29
answered question		105
skipped question		28

Table 16 shows that 85 per cent of respondents considered the concept of high, medium and low-intensity review visits to be appropriate.

Table 16: High, medium and low-intensity review visits

Q15 Is the concept of high, medium and low-intensity review visits appropriate?	Response (%)	Response (count)
Yes	84.6%	90
No	15.4%	16
answered question		106
skipped question		27

Just over 55 per cent of respondents gave free-text responses regarding the intensity of review visits (question 16). There were 78 responses. Some responses addressed multiple issues. Table 17 shows responses for which there were at least two respondents.

Table 17: Free-text responses regarding the intensity of review visits

Response	Number of responses
A one-day visit is insufficient. The minimum duration should be two days. The panel needs sufficient time to make informed decisions.	8
Judging confidence and deciding intensity prior to a visit may suggest a predetermined assessment and may result in adverse media coverage. The media is likely to confuse low, medium and high intensity with low, medium and high risk.	8
There is concern that the concept of peer review would be weakened were the review team to include only one staff reviewer and one student. It may be preferable to specify a minimum panel size of three, to include a minimum of one UK-based academic, in order to enable student involvement in reviews while maintaining the balance of peer review. The QAA officer should be in addition to this.	8
'Intensity' is not the correct word. Alternatives suggested: tailored, duration, scope, complexity, workload, capacity.	7
Risk does not relate to student numbers and using this approach may bias the outcome before a review commences. High, medium and low intensity of risk could be pejorative and may be interpreted as related to competency rather than size or complexity of provision.	7
Clearer criteria are needed to define levels of confidence, risk and intensity. Factors such as volume of documentation relate to intensity (rather than size of review team).	7
Add more flexibility to the number of days for visits.	6

Response	Number of responses
The provider should be consulted during the process of determining the intensity of the review, so that any additional context of which the reviewers may be unaware can inform the final decision taken. If the provider is not consulted, clear and heavy weightings should be given to the self-evaluation document and student submissions.	5
Checks should be made publicly to show how decisions on intensity have been made.	5
Reduce the burden of preparation for reviews and place a word limit on the self-evaluation document and limits on the evidence base.	4
There must be opportunity in exceptional circumstances - such as where assurance cannot be determined from one visit or if significant concerns are raised - for review teams to follow up their first visit or to escalate the case to senior managers for further work. It is not clear from the handbook how this would work (if at all).	4
Intensity should relate to recent history of reviews of the provider.	4
The number of days should relate to analysis of current information and initial experiences, not to history.	3
The proposed timescale of two weeks within which institutions are required to supply primary evidence for the initial appraisal should be extended to a minimum of three weeks in order to accommodate the potential need to collate the information from a variety of internal sources. Similarly, notification of intensity should be well in advance.	3
PSRB reports should be considered when deciding intensity.	3
PSRB reports should not be considered when deciding intensity.	3
QAA should work with Ofsted to reduce the burden of visits.	2
The workload in preparation for review for small organisations is the same as for large ones.	2

There were 76 free-text responses regarding the initial appraisal (question 17).
Some responses addressed multiple issues. All of the responses covered issues previously addressed in this report, so a table is not provided.

4.7 The review visit in more detail

Table 18 shows that 66 per cent of respondents considered that there should be just one visit to the provider.

Table 18: Number of visits to the provider

Q18 Should there be just one visit to the provider?	Response (%)	Response (count)
Yes	65.6%	69
No	34.4%	36
answered question		105
skipped question		28

4.8   The review team

Table 19 shows that 91 per cent of respondents considered it appropriate to allow professional support staff to be reviewers.

Table 19: Professional support staff as reviewers

Q19 Should we allow professional support staff to be reviewers?	Response (%)	Response (count)
Yes	91.1%	97
No	8.9%	9
answered question		106
skipped question		27

4.9   Keeping the method under review

Table 20 shows that 94 per cent of respondents felt that the proposed categorisation of operational, minor and major changes is appropriate.

Table 20: Categorisation of operational, minor and major changes

Q20 Is the proposed categorisation of operational, minor and major changes appropriate?	Response (%)	Response (count)
Yes	94.1%	97
No	5.9%	6
answered question		103
skipped question		30

4.10   The role of students

Table 21 shows that 65 per cent of respondents indicated that the role of students should be strengthened in Higher Education Review as compared to IRENI and RCHE.

Table 21: The role of students

Q21 Should the role of students in Higher Education Review be strengthened compared to the role of students in IRENI and RCHE?	Response (%)	Response (count)
Yes	64.7%	67
No	35.3%	36
answered question		103
skipped question		30

Ninety-three respondents gave free-text responses regarding the role of students (question 22). Some responses addressed multiple issues. Table 22 shows responses for which there were at least two respondents.

Table 22: Free-text responses regarding the role of students

Response	Number of responses
The mechanism proposed risks being unworkable. Giving all students the opportunity to have input into the process could lead to significant numbers of comments for the review team to consider. This contradicts the notion that the review methodology is intended to scale the intensity of review. Not all students understand the process. Student elected bodies should be used, as should lead student representatives.	31
Higher Education Review documentation, training, advice and briefings should indicate clearly and in more detail the roles and the expectation of students. This is especially true of the expectation that students and institutions work in partnership, so that students and lead student representatives do not expect to work independently of the institution in supporting the review process.	17
There should also be a right of reply built into this process if the student view is deemed partial or ill-informed, and so on, by the institution or the review team.	12
The review team should focus on the systems that the provider has in place to engage with students and should not be distracted by comments from large numbers of individual students. There should be emphasis on the institution's response to student surveys such as the NSS, Postgraduate Research Experience Survey and Postgraduate Taught Experience Survey.	10
Providers dealing with part-time or distance-learning students may not be able to meet QAA's requirements for student involvement. Therefore a student submission should not be compulsory.	7
Comments made in the student submission, as for the institutional self-evaluation document, should be substantiated by appropriate evidence.	6
Within small providers - especially in specialist institutions where students' contact hours can be particularly high, and there may be no sabbatical officers within the students' union - there will be a need for a particular flexibility as to how the arrangements associated with the lead student representative are organised. No providers should be penalised if student representation is not forthcoming.	4
QAA should provide exemplars of self-evaluation documents, student submissions and so on.	4
The weight given to student submissions should be transparent.	3
Students should be given a more formal role after the review has finished. Formal involvement in drafting the follow-up action plan and ensuring its implementation would help students' unions to drive enhancement activity between reviews, and would strengthen the partnership approach often displayed during review in the years in between.	3
At least one round of engagements on the review methodology needs to be completed before introducing any more major changes.	2

4.11 Additional comments

Seventy-nine respondents gave free-text responses when asked for any further comments. This amounted to over 50 pages of text. Some responses addressed multiple issues. While these comments have been considered, they are all covered in previous sections of this report and a table has therefore not been produced here to avoid repetition.

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