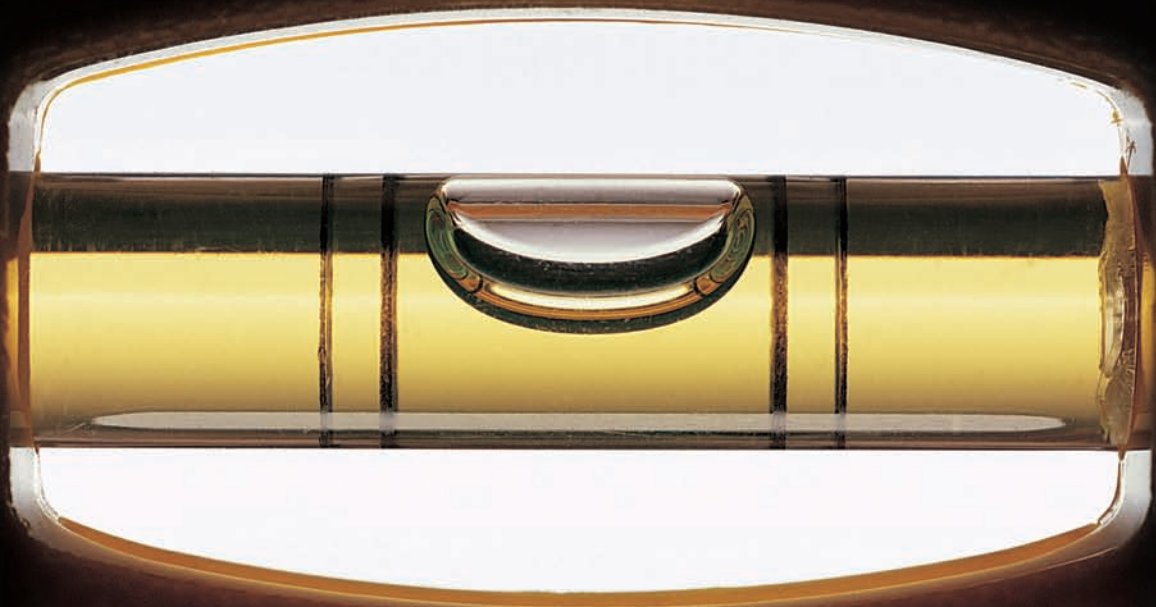


# Quality and standards in UK universities: A guide to how the system works



Universities UK  
Celebrating 90 years  
1918–2008



- 2 Executive summary**
- 3 Quality assurance in UK universities:  
Who does what?**
- 4 University role in quality and standards**
- 7 Universities and the Quality Assurance Agency:  
External review**
- 9 The role of other bodies in quality and  
standards**
- 10 Improvement and enhancement**
- 11 Student involvement**
- 12 If things go wrong**
- 14 International context**
- 15 Conclusion**
- 17 Annex A: Background to quality assurance in  
UK higher education: recent history**
- 19 Annex B: The Academic Infrastructure**
- 21 Annex C: UK differences**
- 23 Notes**

Many sections of this paper comprise text which has been extracted in full or paraphrased, with grateful acknowledgement, from Quality Assurance Agency for Higher Education (QAA) documents. [www.qaa.ac.uk](http://www.qaa.ac.uk)

- 1** UK universities are widely regarded as being among the best in the world. Maintaining the highest academic quality and standards<sup>1</sup> is crucial to that reputation. This paper explains how universities ensure that students can have confidence that the time and money that they invest in their education are well spent.
- 2** The UK model for assuring quality and standards in universities is sound and well-established. It is also well-respected internationally and has influenced parallel developments worldwide. It is a system which has evolved over time and which encourages universities to learn from experience, and each other, in seeking continuously to improve what they do.
- 3** Each university<sup>2</sup> has the responsibility for maintaining the quality of the education it provides and the standards of the qualifications it offers. Universities are their own awarding bodies and they continually assess their systems and their courses to ensure that they are fit for purpose. They do this on an annual basis, for example, by considering reports by external experts and evaluating student performance and feedback; and through Periodic Reviews involving internal and external peers, students and recent graduates of the course. As well as regular scrutiny at the level of individual courses, universities also conduct their own, wider, subject-level reviews. In addition, all universities use a network of external experts – called external examiners – to advise on whether the standards a university sets are appropriate.
- 4** Universities also engage collectively in a range of activities designed to secure and enhance the reputation of the sector as a whole. All universities use a common set of tools, called the ‘Academic Infrastructure’ to underpin their work to maintain quality and standards. The Academic Infrastructure, described in detail in Annex B, includes: *Frameworks for Higher Education Qualifications*, describing the standards represented by each qualification; Subject Benchmark Statements, setting out how those standards apply in particular subject areas; and the *Code of Practice for the Assurance of Academic Quality and Standards in Higher Education*, which sets out precepts and guidance for universities about the management of academic quality and standards, covering everything from external examining to careers education.
- 5** In addition to this work, all universities subscribe to the Quality Assurance Agency for Higher Education (QAA). This is an independent agency which, on behalf of the universities collectively, and the higher education funding bodies in the UK, reviews how individual universities meet their responsibilities for maintaining quality and standards, including by making regular visits to all universities to scrutinise, and report on, their internal processes for maintaining quality.
- 6** Universities also work with professional, statutory and regulatory bodies and other employer groups to ensure their graduates are fit for the world of work. They work with the Higher Education Academy, which supports professionalism in teaching and continuous efforts to improve the student experience.
- 7** This paper describes how the quality assurance system works in all parts of the UK. It sets out the role of all the bodies involved, including the QAA, and is intended to provide a clear explanation of how the different parts of the system fit together for anyone with an interest in how universities work.

- 8** The assurance of standards and quality in the UK is led by the universities themselves, and externally checked by the Quality Assurance Agency for Higher Education (QAA).
- 9** The current system has evolved over time from a more inspection-based model (see Annex A), to one which is designed to ensure that universities manage their own quality and standards effectively and, increasingly, to develop a culture of continuous improvement and enhancement.
- 10** Students are increasingly involved in both internal and external review, as are other stakeholders such as employers and representatives of professional, statutory and regulatory bodies. The aim is to improve quality through self-regulation with a strong input from stakeholders, other organisations and bodies.
- 11** While the details of the quality assurance mechanisms vary between the four countries of the UK, the QAA has adapted the overarching system to accommodate national differences whilst providing a coherent force behind it. All four countries work to common principles and within a common Academic Infrastructure (see Annex B). The main differences between the four national systems are set out at Annex C.

- 12** Each university is a degree awarding body in its own right and is responsible for its own quality and standards.<sup>3</sup> Individual universities have the primary, longstanding and legal responsibility for managing their quality to ensure that their students have a good experience and for maintaining standards to protect the value and currency of awards.
- 13** Universities fulfill their responsibilities for assuring standards and quality through:
- regulations for awarding degrees and other qualifications;
  - procedures for the design, approval, monitoring and review of the courses of study they offer;
  - the assessment of students, which includes making use of external examiners;
  - mechanisms designed to engage and involve students, with the aim of involving them as 'co-creators in their own learning', in all aspects of quality assurance;
  - responding to feedback and interaction with students, employers and professional, statutory and regulatory bodies;
  - exchanging good practice, and dialogue with other universities and QAA, and participation in collective quality initiatives; and
  - co-operation with the QAA and funding council requirements for regular institutional review, including the provision of publicly available information.
- 14** Each university discharges these responsibilities with reference to the QAA *Code of Practice* and QAA, in turn, checks how they do this through its review process which results in a published statement about the degree of confidence that can be placed in each university's ability to manage standards and quality.

### New degree programmes

- 15** Every new degree programme proposed within a university will undergo a rigorous process of programme approval.<sup>4</sup> The department suggesting the degree must present a sound case to a Programme Approval Panel on the proposed content, structure, resources, longevity and market. The Panel ensures that decisions are informed by full consideration of academic standards and of the appropriateness of the learning opportunities that will be offered to students. It also considers the planned outcomes, their delivery and assessment and links to reference points of the Academic Infrastructure, for example ensuring that standards are in line

with the appropriate Subject Benchmark Statements as well as the institution's own award regulations.

- 16** Programme Approval Panels usually include academic staff from other university departments not involved in the delivery of the proposed degree and in most cases will include academic peers and subject experts from other universities. They may also include representatives from professional, statutory and regulatory bodies (PSRBs) or from industry or relevant employer groups (see paragraph 53 below). This externality helps to provide independence and objectivity and thus additional confidence that the standards and quality of the degree are appropriate.

### Current courses: monitoring and review

- 17** Universities routinely monitor and review the effectiveness of each of their courses to ensure they remain current and vital.
- 18** Annual Monitoring, either on-going throughout the year, or in the form of annual reports, involves a process of critical self evaluation by the team providing a course. They reflect on information from a variety of sources including external examiner reports, data on student performance, feedback from staff/student consultation, feedback from employers or PSRBs and any information generated through module monitoring activity or student surveys. As a result of reviewing this information, course teams may decide to make changes to course content, structure, assessment or delivery to further enhance the student learning experience.
- 19** In addition to Annual Monitoring, universities regularly conduct more formal and extensive reviews of courses. Such Periodic Reviews are normally conducted every five or six years and serve to:
- ensure that courses remain current and valid in light of developing knowledge in the discipline, and practice in its application;
  - evaluate the extent to which the intended learning outcomes are being attained by students;
  - evaluate the continuing effectiveness of the curriculum, for example by talking to employers and looking at post-graduation employment information; and
  - ensure that recommendations for appropriate actions are followed up to remedy any identified shortcomings.

- 20** A Periodic Review is a strategic piece of work and typically involves engagement with internal and external peers and with current students and graduates of the course. At the conclusion of the review exercise, the university will decide whether to extend the period of approval of a course for a further five year period and what changes need to be made to ensure the continuing validity and relevance of the provision.

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### Withdrawing courses

- 21** As a result of the monitoring described above, the university may decide to close a course or degree. If closure is recommended, measures must be taken to notify and protect the interests of those involved, in particular those of students enrolled on, or accepted for admission to, the course. The QAA *Code of Practice* states clearly that processes for managing change and the orderly withdrawal of courses are as important as those for design, approval and review.

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### Subject-level review

- 22** As well as considering individual courses, universities are responsible for carrying out regular, wider, reviews at subject level. The QAA (and, in Scotland, the Scottish Funding Council (SFC)) provides guidance for universities in conducting such reviews, for example, in the use of trained reviewers and an element of externality within review teams. In England, the Higher Education Funding Council (HEFCE) expects universities to make information about the process and outcomes of these reviews publicly available, as does the Higher Education Funding Council for Wales (HEFCW) in Wales, though there is no statutory requirement to publish the outcomes. In Scotland the SFC receives an annual summary of internal and external reviews from each university, and expects the QAA to draw on them in its own annual report to the Council. Some Scottish universities make their own reports available, in addition to the reports of the QAA, which are published for each institution.

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### Reviewing the review arrangements

- 23** In addition to all of this, universities must have in place a means of assessing the effectiveness of their course design, approval, monitoring and review practices. QAA expects to see evidence of this in the self-assessment documentation it receives from universities prior to institutional review (see paragraph 34, below). This focus on evaluating the effectiveness of internal quality assurance processes is part of the sector's

overarching commitment to enhancing quality in higher education.

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### Assessment

- 24** Assessment is an important part of how students learn, as well as the means of producing the final summary judgement about how they have performed. All universities have regulations about how student work is assessed to ensure that standards are maintained at the appropriate level, and that student performance is properly judged against this. These are underpinned by a section of the QAA *Code of Practice* which relates specifically to the assessment of students.
- 25** To achieve equity, validity and reliability in the assessment of student work, universities also have policies in relation to internal and external moderation of assessed work. Internal moderation may take various forms but typically will involve a second academic reviewing a sample of student work and verifying that the marks allocated are appropriate. In the event of any dispute about marks the external examiner, who will have been appointed in recognition of their subject expertise, can be asked to moderate and their academic judgement will normally be accepted as both objective and definitive.

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### External examiners

- 26** All UK universities have long made use of a network of independent and impartial academic advisers, called external examiners. These are drawn from other institutions, or from areas of relevant professional practice. External examiners report to the Vice-Chancellor of the university on whether the standards set are appropriate, by referring both to their experience of standards in other universities, and to the Academic Infrastructure established by the QAA (the *Code of Practice*, Subject Benchmark Statements, the *Frameworks for Higher Education Qualifications*, and institutional Programme Specifications). The aim is to ensure that the threshold standards of student performance are comparable with those of students following similar courses in other UK universities.
- 27** External examiners provide authoritative advice on the extent to which the processes for assessment, examination and the determination of awards are sound and have been applied fairly. External examiner reports have significant status within the university. They are directed to the Vice-Chancellor and are considered at, and used by, the department and university in internal quality assurance committees.

**28** The QAA *Code of Practice* provides guidance on the use of external examiners and, in England, Wales and Northern Ireland, universities are expected to share external examiner reports as a matter of course with student representatives.

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### **Public Information provided by universities**

**29** Alongside the mechanisms described in this section, universities make a range of information available for students, employers and the general public. Universities publish Programme Specifications, providing details of undergraduate courses and the knowledge and understanding a student will be expected to have on completion, and how they are to be achieved. In addition, most universities participate in a National Student Survey, which gathers feedback from final year students about their perceptions of their course. The results of this survey are published on the new Unistats website,<sup>5</sup> alongside key statistics, including data on students' entry qualifications, progression, the completion of awards and subsequent employment.



- 30** In addition to their own systems for safeguarding standards and enhancing the quality of their provision, universities are also subject to a rigorous external review process conducted by QAA.

### The review process

- 31** The QAA undertakes regular, formal, external reviews of universities, called 'Institutional Audit' in England and Northern Ireland, 'Institutional Review' in Wales, and 'Enhancement-led Institutional Review' (ELIR) in Scotland. These occur every six years in England, Wales and Northern Ireland, and every four years in Scotland.
- 32** Although the review process varies in the different parts of the UK, its function is to examine the university's internal quality assurance and quality enhancement policies and processes, and to assess and report publicly on the level of confidence that can be placed in them. The QAA also uses reviews of institutions both to identify what it sees as good practice, and also to make recommendations about ways in which improvements might be made to the management of quality and standards. Institutional review is therefore the main way in which the QAA gathers evidence of the university's management of quality and standards.
- 33** While universities themselves are responsible for reviewing courses at subject level, QAA review focuses on examining internal quality assurance and enhancement systems and strategies. The QAA uses a peer review process, in which teams largely comprising academic staff from other institutions, visit universities. In Scotland the team includes an international reviewer. A student is also included in Scottish teams and there are moves towards making similar arrangements in England and Wales and Northern Ireland. Appointment to the review team is by nomination/application and each potential team member is considered against published criteria. Care is taken to ensure the reviewer cohort reflects appropriate sectoral, discipline, geographical, gender and ethnic balances. All reviewers must attend training prior to participating in a review.

### Self-assessment document

- 34** Before the review visit, the university provides the QAA with a written self-evaluation document.<sup>6</sup> This document provides details of arrangements for internally managing quality and standards, and the institution's views of the effectiveness of those structures and mechanisms. The self-

evaluation document is the keystone of the review process and review teams use it as a baseline in setting the agenda for the visit.

### Visits

- 35** Review visits take place in two parts. First, the review team makes a briefing visit to each university, lasting about three days, to ensure they have a good understanding of the institution and to clarify any issues in the university's self-assessment document. This is followed, about five weeks later, by the main visit which usually lasts five days. During this time the review team meets managers, academic staff and students and, sometimes, associated employers. At the end of the visit, the team makes a judgement about whether the university is meeting national expectations for the management of its standards and quality, and also the reliability of information it has provided about them.

### Student focus

- 36** Student interests are central to the principal focuses of review. Review teams scrutinise a range of matters directly relevant to students, including: the accuracy of the information provided for them; the ways in which their learning is facilitated and supported; the means by which they can give feedback on the quality of provision; the means by which they can make a complaint or an academic appeal; and their involvement in internal reviews.
- 37** In addition, student representatives are actively engaged in the key stages of the process. Their representative body, normally the students' union, or equivalent, is invited to participate in the preliminary meeting between the QAA and the institution, as well as the review team meeting students during the main visit. In England, Wales and Northern Ireland they are also invited to make a written submission to the team in advance of the review visit, whilst in Scotland, students are expected to have input into each stage of the university's submission and officers of the representative body and other students are invited to participate in all stages of the process.

### Report and judgement

- 38** Following their visit, the review team prepares a report which discusses the university's arrangements for maintaining appropriate academic standards and quality. It covers institutional strategies for enhancing the quality of its educational provision. It also comments on the accuracy and completeness of the information that the university publishes about

the quality of its educational provision and the standards of its awards. These reports identify features that the review team considers good practice, and makes recommendations about ways in which the institution could improve.

- 39 In the report, the team expresses a summary judgment on the soundness of the university's management of the quality of its courses and the academic standards of its awards, expressed as 'confidence', 'limited confidence', or 'no confidence'.
- 40 In general terms, if the review team judges that the university is managing quality and standards soundly and effectively, and that its future capacity for maintaining quality and standards appears good, 'confidence' will be expressed.
- 41 If the team has doubts, about either the current assurance of quality and standards, or about the institution's capacity to maintain quality and standards in the future, it will express 'limited confidence'. A judgement of limited confidence is not a judgement of failure. It indicates an outcome that is positive but that improvements need to be made.
- 42 However, in extreme cases, if there is "substantial evidence of serious and fundamental weaknesses in the institution's capacity to secure the academic standards of its awards and/or maintain the quality of its educational provision"<sup>7</sup> a review team will make a judgement of 'no confidence'. The team will indicate clearly the reasons and areas of concern that had given rise to this judgement. Although cases of unsatisfactory academic standards of provision have been very rare in UK higher education, where they have occurred the universities in question have moved swiftly to address shortcomings. The QAA's judgment is made public since students and other stakeholders have a right to know where problems have been identified, and to be informed about how the situation has been addressed.
- 43 Review reports also discuss the accuracy, integrity and completeness of the information that the university publishes about the quality of its courses and the academic standards of its awards. In Wales, England and Northern Ireland, an additional separate summary comment is made about this.
- 44 Review reports, containing the summary judgments, are published on the QAA website.

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### Follow-up

- 45 Following the QAA's visit, universities respond to the review team's report, and use it to improve their own performance.

- 46 Where a judgment of confidence has been made, universities prepare a commentary stating how they are building on the strengths identified by the review team and addressing any aspects in need of improvement. Funding bodies use also use the information provided by the report as part of the evidence base for their regular discussions with the institutions they fund.
- 47 Where a judgment of limited confidence has been made, within three months the university must submit an action plan to QAA indicating how it intends to address the recommendations in the report, and must provide, subsequently, a progress report on how the action plan has been implemented. The review is not formally signed off until QAA is satisfied that the action plan has been implemented successfully, with a maximum time limit of 18 months. If, at that point, concerns remain about the effectiveness of the remedial action, QAA will conduct a further visit.
- 48 A judgment of no confidence would indicate that there was substantial evidence of serious and fundamental weaknesses in the university's capacity to secure the academic standards of its awards and/or maintain the quality of its educational provision. Within three months of report publication the university must submit an action plan to QAA with implementation times within 18 months, indicating how it intends to address the recommendations in the report. It must then provide quarterly progress reports on how the identified weaknesses are being addressed. After 18 months, QAA would carry out a follow-up enquiry visit to the institution to check progress. The review would not be formally signed off until QAA was satisfied that the action plan had been implemented successfully.
- 49 Failure to satisfy the QAA could result in the intervention of the relevant funding body,<sup>8</sup> and QAA bringing forward the date of the next visit. In all cases where the QAA has made a judgement of no confidence, the university has responded positively.

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### Public Information provided by QAA

- 50 The documentation published by QAA as a result of the review process is directed at the university being reviewed and how it might improve and as such tends to be technical. However, it is important that information is also available and accessible to other interested parties, including potential students. To address public information needs, the QAA produces a summary of each report for a general audience.<sup>9</sup>

### The funding bodies

- 51** By law, the UK funding bodies have a duty to provide for the assessment of the quality of the provision they are funding. Each of the funding bodies<sup>10</sup> contracts with the QAA for quality assurance services. They each receive a copy of the full QAA report for each university within their jurisdiction. In discharging their quality remit, the funding bodies take account of these reports and may decide to comment on reports or to raise specific issues with individual universities. Each funding body meets regularly with the universities it funds and the outcome of QAA reviews are used routinely as a basis for discussion. Throughout the UK, if a funding body was not satisfied with a university's performance, it could ultimately withhold funding until the issues were addressed satisfactorily.

### The Higher Education Academy

- 52** All UK universities currently subscribe to the Higher Education Academy,<sup>11</sup> which also receives core funding from the UK funding councils. The Academy's major function is quality enhancement. Its mission is to support the higher education sector in providing the best possible learning experience for all students. It plays an important role in assisting universities and colleges to improve the quality of teaching and the student experience in higher education, working closely with them and with the QAA. The Academy accredits over 200 programmes and professional development schemes in teaching for academics. It offers recognition of individual achievement through its fellowships and senior fellowships across the UK and the National Teaching Fellowship Scheme in England and Northern Ireland. It provides a UK-wide framework of support for learning and teaching at discipline level through its 24 Subject Centres, and it supports universities and colleges in bringing about strategic change that will benefit the quality of the student experience, including by sharing good practice. The Academy developed the UK Professional Standards Framework for the sector. The framework applies to all staff who teach and support learning in higher education.

### Professional, statutory and regulatory bodies

- 53** Although each university approves its own courses, individual courses that lead to a professional or vocational qualification, or exemption from a professional examination, are usually accredited by a professional, statutory or regulatory body (PSRBs). For professions which are regulated by statute, only graduates of

accredited courses will be able to practise in the professional area concerned. This is an important safeguard for the public who use services provided by such professionals. For example, the General Medical Council accredits courses in Medicine. PSRBs and employers are involved in the design, approval, monitoring and review of courses with some universities having arrangements for joint accreditation and/or validation events. Members of PSRBs and employer representatives may also be used as external assessors on approval panels.

- 54** Courses are re-accredited on a regular basis, typically every five or six years, although PSRBs may accredit for longer or shorter periods in line with their own priorities. Re-accreditation may take place as a joint exercise with the university where accreditation and university approval periods are the same, but some bodies prefer to conduct separate visits. The PSRB will provide the university with a report of its conclusions and the period of further accreditation awarded. Such reports will normally be considered at department, school, faculty and university level and the university will seek assurance that action is being taken to address any matters identified by the PSRB.

### The National Health Service

- 55** The health service contracts with universities for nursing, midwifery and allied health professions education, and Strategic Health Authorities (in England) also take account of quality assurance matters in their contract monitoring activities. Their systems are designed to operate alongside those of universities and relevant PSRBs, and are being refined in the light of health service re-organisation and the work of the 'Council for Healthcare Regulatory Excellence', which is responsible for consistency and good practice in healthcare regulation.

- 56** Continuous improvement and enhancement<sup>12</sup> of the quality of provision offered to students forms an important part of the overall quality assurance philosophy in UK universities.
- 57** All universities are involved individually and collectively in improvement and enhancement activities and such activities take place at many levels within the institution, from the strategic to operational. In addition to responding to the conclusions and recommendations of approval, accreditation and review exercises, course teams will engage with students, including through formal processes such as Staff Student Consultative Committees and feedback questionnaires. The National Student Survey is another important tool which universities use to improve the student experience.
- 58** Universities also use the review reports published by the QAA to improve what they do, and the QAA follows-up on each review to check the extent to which universities have responded to the issues identified in its report. In its work in all four countries of the UK, the QAA places an increasing emphasis on enhancement as a key aspect of managing quality.
- 59** The substantial amounts of valuable information and data generated by the QAA enable universities to identify and consider general themes emerging within UK higher education, and this forms a key element in universities' improvement and enhancement activities. Themed reports, for example, the *Outcomes from Institutional Audit*<sup>13</sup> series in England and Northern Ireland, and initiatives such as 'Enhancement Themes' in Scotland,<sup>14</sup> collect together the information which has emerged from review visits to universities, and encourage academic and support staff and students to share current good practice and learn from each other.
- 60** The Higher Education Academy also provides support to universities collectively through its network of Subject Centres; its initiatives to support professionalism in teaching; and its work in ensuring that universities have an opportunity to learn from each other by sharing good practice.
- 61** As well as responding to feedback from students and graduates, universities also routinely engage with employers and, in health and social care related areas, user groups, to ensure that courses are providing graduates with the appropriate mix of skills.<sup>15</sup> Universities use this feedback to inform both evolution in the delivery of the course and longer term decisions about course direction and content.
- 62** Universities also routinely seek to benchmark their own performance against published sector-wide data and other sources of information, and use this intelligence to improve what they offer, for example by providing greater flexibility in access to library or IT resources as a result of changing study patterns in the student body, or the development of a new subject area in response to employer demand for graduates with specific knowledge or skills.

- 63** Universities involve students routinely in quality processes through regular feedback and Staff/Student Consultative Committees, as well as in the formal annual monitoring and periodic review activities.
- 64** The Scottish quality assurance system gives students a central role, through the full involvement of student representatives at national, university and course level, and students are already part of QAA review teams in Scotland. Student course representatives receive training by their universities and via a development service called 'Student Participation in Quality Scotland' (Sparqs). Sparqs also provides consultancy to students' associations and universities, advice to the QAA and funding council and contributes to national debates on good practice in all matters relating to the quality of the student learning experience.
- 65** In England and Northern Ireland, training for student course representatives, run by universities and students' unions, is complemented by national training and information events run jointly by QAA and the National Union of Students. Similar arrangements are in place in Wales. The QAA plans to introduce student membership of review teams shortly. The QAA Board, the QAA Scotland Committee and the QAA's Advisory Committee for Wales all have a student member.
- 66** These activities are firmly in line with European developments. Promoting greater student involvement and engagement in quality processes is an aim of the countries involved in the Bologna Process, as encapsulated in the *Standards and Guidelines for Quality Assurance in the European Higher Education Area*.<sup>16</sup>



- 67** Both at university and sector level, there are systems in place to ensure that complaints and concerns can be raised and investigated.

### Student complaints and appeals

- 68** All universities have their own internal complaints procedures, supported by the QAA *Code of Practice*, which contains a section on complaints and appeals. The code states that all universities should have fair, effective and timely procedures for handling students' complaints and academic appeals, and that information about the procedures should be publicly available. Most complaints are resolved internally and the code encourages informal resolution at an early stage before formal procedures are initiated or completed. Universities do not normally allow appeals against the exercise of academic judgment,<sup>17</sup> and this approach has been supported by case law.<sup>18</sup>

### Independent adjudication of student complaints

- 69** In England and Wales, if a student has exhausted the internal complaints procedures of their university and is still unsatisfied they can ask the Office of the Independent Adjudicator for higher education (OIA) to consider their complaint.<sup>19</sup>
- 70** Anyone who was, or is, registered as a student at a higher education institution<sup>20</sup> in England or Wales can complain to the OIA about:
- A programme of study or research for which he or she is or was registered;
  - A service provided to him or her by a higher education institution; or
  - A final decision by a higher education institution's disciplinary or appeal body.
- 71** If the OIA upholds a complaint, either fully or in part, it will make a recommendation to the university about how the situation should be addressed, for example, by paying compensation, assisting the student in some way or asking the university to reconsider a case because of a defect in the handling of the original complaint. In 2007/08, of a student population of over 2 million, 600 eligible complaints were made to the OIA in 2007, of which 11% were found to be "justified" and a further 15% "partly justified". Seven per cent were settled without the need for a full investigation.
- 72** In Scotland, student complaints may be referred to the Scottish Public Services Ombudsman (SPSO). As with the OIA, academic judgements about marks, grades or a final award lie outwith

the Ombudsman's remit, as do complaints about the quality of teaching or assessment. Like the OIA, the SPSO will consider complaints about the process followed by a university when considering academic or disciplinary appeals. The SPSO's reports, including, where appropriate, recommendations for action, are laid before the Scottish Parliament. In 2007–08, of a student population of over 200,000, 60 complaints were made to the SPSO (not all of which will have been made by students). Of all the complaints determined in that year, one was "fully upheld" and two were "partially upheld".

- 73** In Northern Ireland, the universities make use of what is known as the Visitor system as the final stage in their complaints and appeals arrangements. The role of the Visitor is to ensure that the Statutes, Ordinances and Regulations of the university have been properly observed and carried out and that natural justice is observed within the institution. The Visitor's powers do not extend to matters of academic judgement and the Visitor is normally concerned with such matters as procedural propriety, fairness, prejudice and irregularity.

### Institutional matters: The QAA 'Cause for Concern' procedure

- 74** The QAA also has a procedure for handling instances where a 'Cause for Concern' has been identified. Separate, but similar policies cover England, Wales and Northern Ireland, and Scotland. A 'Cause for Concern' is "any policy, procedure or action implemented, or omitted, by a higher or further education institution...which appears likely to jeopardise the institution's capacity to assure the academic standards and quality of any of its higher education programmes and/or awards".<sup>21</sup>
- 75** Where QAA receives information, supported by evidence, from a reputable source, that something is seriously amiss, the causes for concern process would be invoked allowing for immediate and direct intervention by QAA. "Reputable sources" include a range of named organisations in the UK, such as the Government, funding bodies, National Union of Students and many PSRBs. QAA will also investigate "student/public/other stakeholder complaints about serious systemic shortcomings (excluding complaints or appeals relating to individuals) provided they are accompanied by substantiating documentary evidence". They will also investigate whistleblowing by institutional staff, "provided claims are accompanied by substantiating documentary evidence".<sup>22</sup>

**76** The process is one of gradually escalating intervention. Initially, and within a month of QAA's agreement to investigate, a senior member of QAA's staff conducts a brief preliminary enquiry to establish whether there is a case for further investigation. If so, a full investigation is undertaken by a team appointed by QAA with a remit to report within eight weeks. The team's report is published on the QAA website. QAA will discuss the outcome with the university concerned and request an action plan, with targets for rectification of the shortcoming.

- 77** Higher education is an international business. In a competitive global marketplace, the assurance of quality and standards in universities is a major feature in attracting overseas students to the UK. UK universities are highly regarded internationally and value this reputation greatly.
- 78** QAA represents UK interests in a range of international fora. It monitors and incorporates into the UK arrangements, as appropriate, developments in quality assurance at European level, as part of the Bologna process. The UK Academic Infrastructure is consistent with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area*.<sup>23</sup> QAA contributes to, influences and learns from international quality assurance through membership of many international organisations and involvement in higher education projects. It is involved in a wide range of international quality assurance initiatives and, in particular, European Union and Bologna Process matters. This includes membership of the International Network of Quality Assurance Agencies in Higher Education (INQAAHE) and the European Association for Quality Assurance in Higher Education (ENQA). Interest in quality assurance arrangements for UK higher education is such that QAA receives around 50 parties of international visitors per annum.
- 79** As part of ongoing monitoring, QAA was reviewed early in 2008 by an independent external team appointed by its main stakeholders, to confirm that it continues to meet the membership criteria of ENQA.<sup>24</sup>



- 80** Robust arrangements for assuring quality and securing standards are in place in UK universities, led by universities themselves. The combination of thorough internal processes, rigorous external review, and a commitment to continuous improvement is designed to safeguard quality and standards, and help universities enhance the student experience. It is an approach which is widely admired internationally, and has influenced the development of quality assurance systems worldwide.
- 81** However, UK universities are not complacent about quality or standards, and the quality assurance system is kept under review and continues to evolve in the light of experience.



- 1 The roots of the current system lie in the legislation of the late 1980s and early 1990s, a time when government deliberately stimulated both demand and supply in higher education, dramatically increasing the numbers of students without a commensurate increase in funding, leading in turn to a lowering of the “unit of resource” per student. It also bestowed university title on more than thirty polytechnic institutions, which were largely responsible for the expansion in student numbers during this period. The increasing diversity of the sector gave rise to questions about the changing nature of higher education and, inevitably, its quality and standards. In addition, the former polytechnic sector had been subject to external regulation of its quality and standards via the Council for National Academic Awards (which validated their degrees) and this model proved attractive to government.
- 2 As a consequence of the development of a mass higher education sector, government interest in securing greater accountability and assuring measurable outputs and outcomes from higher education also grew. As part of this, a renewed focus on “quality” led to the adoption of new processes – characterised by a move away from a reliance on the judgement of professional staff delivering the service towards inspectorial-style judgements made by external bodies. This information was intended to be used to inform users about provision and to provide government with assurances about value for money. The White Paper *Higher Education: a New Framework*, issued in 1991, proposed the establishment of the four, territorial, UK higher education funding bodies. It also considered quality and distinguished between two types of external quality assurance mechanisms:
  - ‘Quality audit’ – external scrutiny aimed at providing guarantees that institutions have suitable quality control mechanisms in place; and
  - ‘Quality assessment’ – the external review of, and judgments about, the quality of teaching and learning in institutions.
- 3 Quality audit would be the responsibility of a unit owned by higher education institutions and quality assessment that of the funding councils.
- 4 To consider issues that fell into the remit of audit, universities and colleges of higher education established the Higher Education Quality Council (HEQC) in 1992. Most of the functions of the CNAA were no longer required, now that polytechnics were universities with their own degree-awarding powers, and it closed. HEQC absorbed

many of the non-awarding functions of CNAA thereby adding a quality enhancement role to its audit function. Meanwhile the legislation that established the territorial funding bodies in 1992 required them to form quality assessment committees and to secure the assessment of quality in the sectors they were funding. The two processes of audit and assessment (which came to be known as “teaching quality assessment”) worked in parallel for the next eight years.

### Teaching quality assessment (TQA)

- 5 In response to the legislation, the funding councils established departments staffed with quality assessors and an extensive programme of “teaching quality assessment” (TQA) was introduced in each of the jurisdictions. TQA was conducted on a subject-by-subject basis by teams of academic assessors that considered a self-assessment document prepared by each university department, generally followed up by visits. The assessment team’s considerations were noted in institutional reports and a summarising judgement given to each department. The whole cycle took around five years to complete and each of the funding bodies made several adjustments to the process as it developed in practice.
- 6 By 2001 almost all UK academic departments had been assessed of which only a tiny number were considered “unsatisfactory”. TQA enabled the sector to confirm comparability of standards across the whole of the UK higher education system and provided an invaluable set of baseline data on the quality of UK higher education provision. It was, however, highly resource-intensive, both for the funding bodies’ assessment directorates and for universities, which often had to prepare more than one department for assessment at a time. This prompted the Dearing Committee to conclude that “given that the vast majority of outcomes have been satisfactory, we are not convinced that it would be the best use of scarce resources to continue the system in the long term”.<sup>25</sup> The departmental focus did not address the fact that quality assurance is a university-wide responsibility. In addition, its inspectorial nature led to an element of “gamesmanship” in the process, with departments hoping the assessors would not uncover any areas of weakness, at the expense of the university having a full and frank exchange about areas for improvement. Crucially, there was accumulating evidence that applicants to university were not using the information provided by the review reports in making their choices, even though a rolling

programme of league tables began to appear in the media as soon as the summary judgements were published. As universities responded to the review reports, information rapidly became out of date and ceased to be useable.

- 7** TQA ended in Scotland and Wales in 1997 after the first cycle. It took until 2001 for the larger combined sector of England and Northern Ireland to complete. Meanwhile, the staff and functions of the HEQC, along with the quality assessment divisions of the English and Welsh funding councils, were absorbed into the new Quality Assurance Agency for Higher Education (QAA). This had been proposed by the Joint Planning Group for Quality Assurance in Higher Education and was provided with an agenda by the Dearing Report in 1997. Whilst bringing both aspects of external quality assurance together within a single central organisation was rational and appropriate, universities were now enduring two separate external processes, carried out by the same agency, and pressed QAA to streamline this into a single mechanism. The intervening period, until the current quality assurance system was introduced in 2002, was characterised by the completing of TQA in England and Northern Ireland, new subject reviews in Scotland and a two-year period of developmental engagements in Wales.
- 8** TQA/subject review was, therefore, a robust first stage process but, for universities and their students to fully benefit, it needed to evolve to fit with a system that encouraged self-critical debate within universities and emphasised their own and ongoing management and quality improvement tools and processes. The work of HEQC, alongside the practice of TQA, had highlighted learning and teaching issues within institutions and generated a huge, creative and, ultimately, constructive debate in the higher education sector about the nature, purposes and execution of quality assurance. The language of quality, and thinking about its application, became widespread in the sector. This thinking has matured and in so doing, has clarified principles and objectives and assisted the emergence, after several different incarnations, of the system, adapted and appropriate to higher education, in operation today.

- 1 The UK Academic Infrastructure is key to the process of assuring quality and standards across UK higher education. It comprises a collection of integrated concepts and documentation that have been developed by QAA and universities and provides a self-regulating national framework within which autonomous universities can describe and manage their academic standards and quality. Although it is, by its nature, a single set of external reference points, the Academic Infrastructure allows for diversity and innovation within courses offered by individual universities. All universities subscribe to the Academic Infrastructure and QAA judges the extent to which they make use of it in managing the standards and quality of their courses. It is kept under continual review and is revised as appropriate. The UK Academic Infrastructure is unique and much admired internationally. It is consistent with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area*<sup>26</sup> although it is more detailed than the Standards and Guidelines and more specific to the expectations of UK higher education.<sup>27</sup>
- 2 The four elements of the Academic Infrastructure are:
  - the **Code of Practice** for the assurance of academic quality and standards in higher education;
  - **Frameworks for Higher Education Qualifications** in England, Wales and Northern Ireland, and in Scotland;
  - **Subject Benchmark Statements**; and
  - **Programme Specifications**.
- 3 These four individual elements relate to one another so that, for example, the learning outcomes detailed in the Programme Specification will relate to the Subject Benchmark Statement and be located in the Qualifications Frameworks at the appropriate level.

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### The Code of Practice

- 4 The *Code of Practice for the Assurance of Academic Quality and Standards* is essentially a set of guidelines on good practice in universities. Its ten themed sections range from admissions to course design, assessment and careers advice and provide a framework within which individual universities can consider the effectiveness of their approaches to learning and teaching-related activity. The Code is designed so that every institution, regardless of its size, subject base, physical environment, population mix,

traditions etc, will find it relevant. The *Code of Practice* can be found on the QAA website.<sup>28</sup>

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### Frameworks for Higher Education Qualifications

- 5 The two qualification Frameworks describe the main attributes of the major higher education qualifications – the levels of achievement they represent. The frameworks are designed to ensure that universities use the titles of qualifications consistently and as a tool to ensure that they assign the appropriate level to new qualifications that they are developing. They therefore provide a crucial set of points of reference for setting and assessing the standards of their courses. In this way they also assist external examiners and QAA reviewers.
- 6 They are also intended as a guide for prospective students and employers so they can see how different qualifications relate to one another and thus what might be the next step in their progression.
- 7 To give an example, at Honours level a graduate will be expected to have developed “an understanding of a complex body of knowledge, some of it at the current boundaries of an academic discipline. Through this, the graduate will have developed analytical techniques and problem-solving skills that can be applied in many types of employment. The graduate will be able to evaluate evidence, arguments and assumptions, to reach sound judgements, and to communicate effectively. An Honours graduate should have the qualities needed for employment in situations requiring the exercise of personal responsibility, and decision-making in complex and unpredictable circumstances.”<sup>29</sup>
- 8 In acknowledgement of the different types of qualifications that are available in different parts of the UK, there are two frameworks: one for England, Wales and Northern Ireland and another for Scotland. Details of each of the frameworks can be found on the QAA website.<sup>30</sup>

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### Subject Benchmark Statements

- 9 Universities are responsible for determining their own curricula and there is no national curriculum in higher education. As part of the Academic Infrastructure, however, Benchmark Statements set out expectations about standards of degrees in each subject area such as history or engineering. The benchmark statement describes what gives a discipline its coherence and identity, and defines what can be expected of a graduate in terms of the abilities and skills

needed to develop understanding or competence in that subject. Benchmark Statements for some subjects, such as Chemistry, include core content. Others, such as History, allow for a more varied curriculum. Benchmark statements have been developed by, and agreed with, the relevant academic subject communities and national academies of learning, professional bodies and employers as appropriate. This process is dynamic, with existing Subject Benchmark Statements undergoing systematic review over the past few years and new statements being developed as the need arises.

- 10** Subject Benchmark Statements, therefore, allow individual universities flexibility and innovation in course design, within an overall conceptual framework established by the wider academic subject community. Standards in most higher education subjects apply UK-wide. There are exceptions in a few cases of professional qualifications where there are particular standards applying in different parts of the UK, for example in Teaching and in Nursing and Midwifery. Some benchmark statements combine or make reference to professional standards required by external professional or regulatory bodies in the discipline.
- 11** Subject Benchmark Statements are published on the QAA website. They are largely intended to assist academic staff involved in course design, delivery and review but they may also be of interest to prospective students and employers, seeking information about the content, nature and standards of awards in a subject area.

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### **Programme Specifications**

- 12** In addition to these external reference points, all universities are expected to produce Programme Specifications, which provide information about each programme of learning leading to a qualification, that they offer. The programme specification describes the intended outcomes of learning from a course and the means by which these outcomes will be achieved and demonstrated. Programme Specifications were proposed by the Dearing Committee as a means of informing applicants to university, students and employers about the “knowledge and understanding that a student will be expected to have upon completion”.<sup>31</sup>

	Review	Self assessment document	Student submissions	Visits	Judgements	Recommendations	Follow up
<b>England/ N. Ireland</b>	<b>Institutional Audit</b> involving all universities over a six-year cycle	<b>Institutional Briefing Paper.</b> Visiting team will use it to consider the extent to which institutional-level approaches to quality enhancement make systematic use of management information.	Student representatives expected to make a separate submission of their own alongside the institution's document	In two parts: A 'briefing visit', lasting three days, followed by the formal audit visit, which usually lasts five days.	As well as a summary judgement about the soundness of the university's management of the quality of its courses and the academic standards of its awards, review team also makes a comment on the accuracy, integrity, completeness and frankness of the information that the institution publishes about the quality of its courses and the academic standards of its awards.	The published report includes the audit team's recommendations for consideration by the institution, categorised in order of priority: "essential", "advisable" or "desirable".	A paper-based exercise in which the QAA looks at developments since the audit. The institution is asked to comment on actions they have taken since the audit report and any other changes. Occurs at the three-year mid-cycle point
<b>Scotland</b>	<b>Enhancement-Led Institutional Review (ELIR)</b> involving all universities over a four-year cycle.	<b>Reflective Analysis (RA).</b> Universities use it to document their entire range of quality assurance and enhancement activities	Students do not make a separate submission, but are involved at each stage of the institutional process of submitting the Reflective Analysis.	Usually last between five and seven days, in two parts	Summary judgements are made about the soundness of the university's management of the quality of its courses and the academic standards of its awards. Other issues are captured in body of report.	These are contained in the body of the text.	One year after review, the university provides written update to QAA indicating action to be taken in the light of its report. This provides basis for discussion at the annual meeting each institution has with the Agency.
<b>Wales</b>	<b>Institutional Review</b> involving all universities over a six-year cycle	<b>Self-Evaluation Document (SED)</b> also indicates where "thematic trails" might be picked up by the review team.	Students encouraged to make separate submission if they wish	Usually last between five and seven days, in two parts	As well as a summary judgement about the soundness of the university's management of the quality of its courses and the academic standards of its awards, a comment is also made about the accuracy, completeness and reliability of the information that an institution publishes.	These are contained in the body of the text.	The reviewed university submits a written progress report to the QAA in mid cycle, prior to a meeting between the institution and the Agency.





Many sections of this paper comprise text which has been extracted in full or paraphrased, with grateful acknowledgement, from Quality Assurance Agency for Higher Education (QAA) documents. [www.qaa.ac.uk](http://www.qaa.ac.uk)

- 1 Academic 'standards' describe the level of achievement (the threshold) that a student has to reach to gain a particular degree or other academic award. Academic 'quality' describes the effectiveness of the learning experience provided by universities to their students, ie the appropriateness and effectiveness of learning, teaching, assessment and support opportunities provided to assist students achieve their learning objectives.
- 2 For ease of reading we have used the term 'university' throughout this document. Other Higher Education Institutions are also subject to the measures described. There are specific arrangements for monitoring the quality of collaborative provision, and higher education provided in further education colleges, which are not described here. For further information see: [www.qaa.ac.uk](http://www.qaa.ac.uk)
- 3 The QAA advises the Privy Council on the grant of degree awarding powers and the 'university' title. The criteria can be found at <http://www.qaa.ac.uk/reviews/dap/briefGuideDAP.asp>
- 4 In some universities this process is known as 'validation'.
- 5 [www.unistats.com](http://www.unistats.com)
- 6 In England and Northern Ireland this is called a "Briefing Paper", in Scotland it is a "Reflective Analysis" and in Wales "Self-Evaluation Document".
- 7 Handbook for Institutional Audit: England and Northern Ireland, Quality Assurance Agency for Higher Education <http://www.qaa.ac.uk/reviews/institutionalAudit/handbook2006/default.asp>
- 8 HEFCE has developed a policy for addressing unsatisfactory quality. See [http://www.hefce.ac.uk/pubs/circlets/2008/cl21\\_08/](http://www.hefce.ac.uk/pubs/circlets/2008/cl21_08/)
- 9 As part of the main report in England, Wales and Northern Ireland, and in a separate document in Scotland.
- 10 The Higher Education Funding Councils for England, Scotland and Wales, and the Department for Employment and Learning in Northern Ireland.
- 11 The Higher Education Academy was established in 2004 and is an independent company which is jointly owned by the representative bodies for higher education (Universities UK and GuildHE).
- 12 'Enhancement' being the deliberate steps an institution takes at a strategic and managerial level to bring about 'improvement'.
- 13 <http://www.qaa.ac.uk/reviews/institutionalAudit/outcomes/default.asp>
- 14 For information about 'Enhancement Themes' see [www.enhancementthemes.ac.uk](http://www.enhancementthemes.ac.uk).
- 15 According to the HEFCE *Higher Education Business Interaction Survey*, 78% of HEIs report that employers are actively engaged in the development of content and regular reviewing of curriculum at levels 4 or 5 on a 5 point scale (ie the highest level).
- 16 *Standards and Guidelines for Quality Assurance in the European Higher Education Area*, European Association for Quality in Higher Education (ENQA) (2005).
- 17 Other than where there has been a procedural irregularity, or where there are mitigating circumstances which for good reason were not presented at an earlier stage.
- 18 It is clear from settled case law that a university's own rules are the sole forum for dispute resolution in relation to purely academic matters (R v University of Aston Senate ex parte Roffey 1969). The courts will not second guess academic judgment but will be concerned with the procedural fairness aspects (Clark v University of Lincolnshire and Humberside 2000)
- 19 The Office of the Independent Adjudicator (OIA) was established in July 2003 and commenced a voluntary student complaints scheme in March 2004. It superseded the former visitorial system. The OIA was given a statutory footing in the Higher Education Act 2004 which requires all universities in England and Wales comply with the rules for resolving student complaints.
- 20 A student who is at another institution, but undertaking a course of study or programme of research leading to the grant of an award validated or franchised by a higher education institution, is also covered by the OIA scheme.
- 21 *A Guide to Causes for Concern (England and Wales)*, QAA, <http://www.qaa.ac.uk/aboutus/policy/concern.asp> Page 2 paragraph 1.
- 22 QAA *ibid* Page 2 paragraph 5.
- 23 ENQA 2005 *ibid* at 15.
- 24 The report of the ENQA Review Panel will be considered by the ENQA Board in November 2008 and the result published at <http://www.hefce.ac.uk/learning/qual/review.asp>
- 25 *National Committee of Inquiry into Higher Education: Higher Education in the Learning Society* (The Dearing Report) HMSO (1997) paragraph 10.68.
- 26 ENQA 2005 *ibid* at 15.
- 27 Handbook for institutional audit: England and Northern Ireland 2006 (with additional commentary) <http://www.qaa.ac.uk/reviews/institutionalAudit/handbook2006/handbookComments.asp>
- 28 see <http://www.qaa.ac.uk/academicinfrastructure/codeOfPractice/default.asp>
- 29 Framework for Higher Education Qualifications in England, Wales and Northern Ireland <http://www.qaa.ac.uk/academicinfrastructure/FHEQ/EWNI/default.asp>
- 30 Details of the *Frameworks for qualifications*, including level descriptors can be found at: <http://www.qaa.ac.uk/academicinfrastructure/FHEQ/default.asp>
- 31 The Dearing Report, (1997) Recommendation 21 paragraph 9.53.





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