This consultation document sets out proposals for revisions to the system used for quality assurance of higher education in England and Northern Ireland.

Responses should be made online by Friday 5 March 2010

Future arrangements for quality assurance in England and Northern Ireland

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Future arrangements for quality assurance in England and Northern Ireland

To	Heads of HEFCE-funded higher education institutions
	Heads of HEFCE-funded further education colleges
	Heads of LSC-funded further education colleges
	Heads of universities in Northern Ireland
Of interest to those responsible for	Institutional staff responsible for quality assurance
	Student union officers
	Funding councils and institutional representative bodies in Scotland and Wales
	Other bodies with an interest in quality assurance of higher education, including employer bodies; professional, statutory and regulatory bodies
Reference	2009/**47**
Publication date	December 2009
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Executive summary

Purpose

1. This consultation document sets out proposals for revisions to the system used for quality assurance of higher education in England and Northern Ireland. It has been developed by the representative bodies for higher education (Universities UK (UUK) and GuildHE) and funders (HEFCE and the Department for Employment and Learning (in Northern Ireland)), with the advice and guidance of the Quality Assurance Agency for Higher Education (QAA).

2. We are committed to a quality assurance system that is accountable, rigorous, transparent, flexible, responsive and public-facing. We want to tackle concerns about quality and standards and make real changes to improve the student experience and the reputation of higher education.

Key points

3. This document consults on:

a. Principles and objectives for the revised quality assurance system.

b. The outline of a revised institutional audit method to operate from 2011-12, which would be more flexible and transparent, and which would provide improved information for a non-specialist audience, presented in clear and accessible terms.

c. How institutional audit could focus on particular topics, and how these might change over time.

d. How the comparability of threshold standards could be assured.

e. How the language used to describe the different levels of confidence expressed in audit judgements might be improved.

f. Whether institutional audit should make a judgement (rather than a comment) about the reliance that can be placed on the accuracy and completeness of published information.

4. The QAA will run a further consultation on the detail of the revised institutional audit method in late 2010.

5. This document also describes related elements of the quality assurance system, including: arrangements for external examining and the review of these being conducted by UUK and GuildHE; the review of teaching quality information being conducted by the Teaching Quality Information/National Student Survey Steering Group; and the review of the Academic Infrastructure being conducted by the QAA.

Action required

6. Responses should be made online by **Friday 5 March 2010** using the response form which can be accessed on the HEFCE web-site alongside this document at www.hefce.ac.uk/pubs/hefce/2009/09_47. This is an open consultation and we would welcome views from anyone with an interest in higher education.

Purpose of consultation

7. This consultation document sets out proposals for revisions to the system used for the quality assurance of higher education (HE) in England and Northern Ireland. It reflects the need to decide on the quality assurance review method to be used in England's and Northern Ireland's higher education institutions (HEIs) after 2010-11, when the current cycle of institutional audit will be completed. This provides a valuable opportunity to consider how the quality assurance system for higher education as a whole can maintain its fitness for purpose in the years ahead.

8. The document takes account of both the need to assure quality (that is, appropriate and effective teaching, support, assessment and opportunities for learning provided for students) and to maintain threshold standards (that is, the level of achievement that a student has to reach to gain an award). It concentrates in particular on the role of institutions and the Quality Assurance Agency for Higher Education (QAA) in doing this, while acknowledging that professional, statutory and regulatory bodies (PSRBs) also play a vital role. We also set out how the representative bodies, HEFCE, the Department for Employment and Learning (in Northern Ireland) (DEL) and the QAA will work together in a new group to oversee and manage the revised quality assurance system.

9. Therefore, this consultation seeks views on:

a. Principles and objectives for the revised quality assurance system.

b. The outline of a revised institutional audit method to operate from 2011-12, which would be more flexible and transparent, and which would provide improved information for a non-specialist audience presented in clear and accessible terms.

c. How institutional audit could focus on particular topics, and how these might change over time.

d. How the comparability of threshold standards might be assured.

e. How the language used to describe the different levels of confidence expressed in audit judgements might be improved.

f. Whether institutional audit should make a judgement (rather than a comment) about the reliance that can be placed on the accuracy and completeness of published information.

10. Once these fundamental matters have been decided, the QAA will produce a detailed operational description for institutional audit explaining how the expectations and outcomes of the process will be achieved in practice. This will include details of the issues to be assessed together with the potential sources of evidence and an account of the arrangements for the publication of the findings. Following consultation by the QAA in 2010, the operational description will form the basis of a handbook for institutions, auditors and others offering guidance on how audits will be conducted. Agreement on the purposes, principles and outputs of the arrangements will also underpin revisions to the method for the quality assurance of HE in further education colleges (FECs), and the publication of Teaching Quality Information (TQI). These will be the subject of separate consultations to follow in 2010-11.

11. The intention is that, using a sector-wide approach based on agreed principles, purposes, outputs and outcomes, institutions in England and Northern Ireland will be able to demonstrate clearly that they are operating, and are themselves subject to, robust, effective and transparent quality assurance procedures. Improved public access to verified and useful information on standards and quality will benefit students, employers and society more broadly, and will provide a basis for continued confidence in programmes and awards offered by HEIs.

Introduction

12. We have a world-class higher education system in England and Northern Ireland, with an excellent reputation for the quality of its degrees and its teaching. This is echoed in the views of our students, who have consistently rated their experiences highly. However, it is essential that the public remain confident in this reputation, and this depends on very high academic quality and standards. Higher education providers have a duty to provide a high-quality learning experience to their students, whose future careers and personal development ambitions depend on what they experience and achieve during their studies. Further, a robust and rigorous approach to quality assurance and standards is crucial to continued employer confidence, and to the good international standing of our higher education institutions and graduates.

13. This document discusses the future system for quality assurance of higher education in England and Northern Ireland, and proposes ways in which this system can meet the needs of all those with an interest in quality assurance, including how existing arrangements can be improved. The consultation seeks the views of the higher education community and other interested parties on these proposals.

14. A number of bodies, including autonomous universities and colleges, HEFCE, DEL, the QAA and the Secretary of State, have distinct but complementary roles in the assurance of quality and standards of higher education in England and Northern Ireland. Students increasingly have their own place in this quality assurance system, engaging through feedback, representation and acting as student auditors. Employers and PSRBs also play an important role.

15. The current quality assurance system in England and Northern Ireland, the Quality Assurance Framework (QAF), has been in place since 2002. This framework sets out to ensure that standards are set, maintained and assured, and that the quality of the student learning experience is protected.

16. A detailed description of the various elements of the QAF is set out in Annex A of this document. In brief, it comprises institutional audits and collaborative provision audits carried out by the operationally independent QAA, and the provision of published information on quality and standards (including a national student survey). Institutions' own internal quality assurance processes are a vital part of the system, as is the Academic Infrastructure – a set of 'reference points' against which all institutions manage their own academic quality and standards. External examiners play a central role in assuring comparability of standards[1]. Audit examines the use by institutions of the reference points, external examiners and internal quality assurance processes, in order to ensure that they are functioning well.

17. These arrangements are complemented by other safeguards. These include the QAA's 'causes for concern' procedure[2], which enables a problem at an institution to be quickly investigated, whether the problem is identified by a student, a member of staff or any other person or organisation. HEFCE also has a policy to address unsatisfactory quality in the case of long-term poor quality in an institution, which involves the removal of funding should serious failings go unaddressed[3]. All HEIs have their own internal processes for dealing with student complaints, while the Office of the Independent Adjudicator for Higher Education provides an independent and free recourse for student complaints in England. More than 50 public, statutory and regulatory bodies also have an important role in quality and standards for the awards they accredit. QAA auditors use information from these bodies' reviews where possible, to avoid duplication.

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[1] For more information on external examining and the review of external examining currently underway, see paragraphs 75-77.

[2] Further information can be found at www.qaa.ac.uk/causesforconcern/concern.asp

[3] 'Policy for addressing unsatisfactory quality in institutions' (HEFCE 2009/31) can be read at www.hefce.ac.uk under Publications.

18. We believe that all of these safeguards, which are also described in more detail in the UUK publication 'Quality and standards in UK universities: A guide to how the system works' (2008)[4], are vital and should not be replaced. This consultation concentrates primarily on improvements to institutional audit. However, it begins by asking about principles and intended outcomes for the quality assurance system as a whole. This will have an impact on future consultations, for example on the method for reviewing HE in further education colleges.

19. The QAF itself has changed over time, in line with the recommendations of the QAF Review Group, chaired by Dame Sandra Burslem. This group recommended that 'the purpose of the QAF, its impact and effectiveness should be reviewed before the final year of the first cycle [of institutional audit] in order that any changes can be consulted on and agreed'[5]. As we are now coming up to the end of the current cycle of institutional audit (July 2011), this consultation takes forward that recommendation.

20. This consultation document has been developed by the representative bodies for higher education (UUK and GuildHE) and funders (HEFCE, DEL), who are the formal signatories, with the advice and guidance of the QAA, and has been endorsed by the Boards of these organisations. In recognition of the importance to robust quality assurance of the independence both of HEIs and of the QAA, the latter has advised on, but is not a formal signatory to, the consultation. The National Union of Students (NUS) has also contributed greatly to the analysis and the development of the proposals.

21. The Association of Colleges has also participated fully in the discussions that have informed this consultation document. The involvement of further education colleges in framing a comprehensive approach to quality assurance recognises the significant and evolving contribution of colleges to higher education.

Concerns raised over quality and standards

22. Recent concerns have been raised over whether quality and standards are being maintained in the face of a mass higher education system. Several groups have looked at the evidence for these concerns, including a sub-group of HEFCE's Teaching, Quality, and the Student Experience (TQSE) committee[6], the QAA[7], the UUK/GuildHE/QAA Quality Forum, and the House of Commons Select Committee for Innovation, Universities, Science and Skills (IUSS)[8]. The issues discussed by the various groups included 'contact time' and study hours, plagiarism, admissions and assessment practices and external examining. The groups also debated whether the information currently published about HE is sufficiently accessible and useful.

23. This consultation takes forward the recommendations of the above groups' reports where relevant. There are undoubtedly some areas that need to change, and there is a risk that public confidence in the quality of higher education could be damaged if no action is taken. However, we should take care that the many effective elements of the existing arrangements are not lost. Any revised quality assurance system needs to be able to respond to concerns and be sufficiently flexible to adapt to the continually changing nature of higher education, while remaining robust. It also needs to provide jargon-free information that can be understood by a non-specialist audience.

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[4] Universities UK, 'Quality and standards in UK universities: A Guide to how the system works' (2008), available at www.universitiesuk.ac.uk/quality

[5] HEFCE 2005/35, 'Review of the Quality Assurance Framework: Phase one outcomes', recommendation 18.

[6] 'Report of the sub-committee for Teaching, Quality, and the Student Experience: HEFCE's statutory responsibility for quality assurance' (HEFCE 2009/40), available at www.hefce.ac.uk under Publications.

[7] 'Thematic enquiries into concerns about academic quality and standards in higher education in England – final report', QAA (2009), available at www.qaa.ac.uk under Publications/Thematic enquiries project.

[8] 'Innovation, Universities, Science and Skills Committee – Eleventh report', House of Commons (2009), available at www.publications.parliament.uk/pa/cm200809/cmselect/cmdius/170/17002.htm

Consultation on the future quality assurance system

24. This consultation is in two main sections:

• principles and objectives for a revised system

• the future of institutional audit.

25. Each section comprises a discussion of the relevant topic, proposals for future developments and a series of embedded questions to which you are invited to respond. Each question requires respondents to indicate their level of agreement on a five-point scale, and also allows 'free text' comments.

26. Your views on the proposals and the questions should be returned by **Friday 5 March 2010** using the online response form which can be accessed on the HEFCE web-site alongside this document at www.hefce.ac.uk/pubs/hefce/2009/09_47.

27. Seminars providing the opportunity to discuss the consultation questions further will be held on 21 and 27 January 2010. All institutions have been sent invitations to these events. If you require further information please contact Mary Gazzard (tel 0117 931 7443, e-mail m.gazzard@hefce.ac.uk).

Principles and objectives for a revised system

Strengths and limitations of the current system

28. The current QAF has many strengths, which should be recognised. In particular, the following characteristics are fundamental and it is proposed that they should be retained:

a. Principal responsibility for standards and quality lying with individual institutions, operating with reference to, and within the parameters set by, agreed national reference points.

b. Clear links between institutions' internal processes and external verification.

c. Sustained student engagement at all levels (including students as full members of audit teams in many cases).

d. External quality assurance carried out by operationally independent bodies (QAA and PSRBs).

e. Clear and independent systems for managing complaints and causes for concern.

f. Support for a diverse HE sector with a range of awarding bodies and programmes.

g. A strong emphasis on quality enhancement as well as quality assurance[9].

h. Good fit with European standards and guidelines, which supports global recognition of the high standards of our awards[10].

29. The QAF does, however, need to be revised to include mechanisms that can quickly and robustly address concerns such as those referred to in paragraph 22. Revised arrangements should also provide reassurance to the general public. In particular they will need to address:

a. Concerns that standards between institutions are not comparable, or consistently applied.

b. A need for improved information, advice and guidance for prospective students.

c. Limited flexibility of the current system to respond to changing circumstances.

d. External examiner arrangements that may not be able to respond to future challenges unless reformed.

e. The use of overly technical language that does not meet the needs of different audiences.

f. The perception that higher education is too insular in its approach to quality assurance.

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[9] For more detail on quality enhancement see paragraphs 82-83.

[10] For example, England, Northern Ireland and Wales are, together, one of nine out of 46 Bologna Process European countries to successfully verify their qualifications frameworks against the Framework for Qualifications of the European Higher Education Area.

g.	The need to ensure that the different institutional and sector-wide elements of quality assurance, including those that fall under the remit of PSRBs, are seen as a comprehensive whole.

h.	Poor public understanding of quality assurance processes, and sometimes poor sector understanding.

30.	For the purposes of this consultation, we have replaced the term 'Quality Assurance Framework' with 'quality assurance system'. We believe that this is more indicative of the wide range of processes that underlie quality and standards in higher education.

Principles underpinning the revised quality assurance system

31.	The revised quality assurance system must be underpinned by principles which will provide the conceptual and operational context in which it operates. We consider that the revised system to assure quality and standards should (note that these are not listed in any order of priority):

a.	Provide authoritative, publicly accessible information on academic quality and standards in higher education.

b.	Command public, employer and other stakeholder confidence.

c.	Meet the needs of the funding bodies and of institutions.

d.	Meet the needs of students.

e.	Rely on independent judgement.

f.	Support a culture of quality improvement within institutions.

g.	Work effectively and efficiently.

Consultation question 1

Do you agree that the principles in paragraph 31 are broadly the correct ones on which the revised quality assurance system should be based?

32.	Objectives for the revised quality assurance system flow from each of these principles, as follows (note that these are not listed in order of priority):

a.	**Provide authoritative, publicly accessible information on academic quality and standards in higher education.**

  i.	Provide timely and readily accessible public information, on a consistent and comparable basis, on the quality and standards of the educational provision for which each institution takes responsibility.

  ii.	Report results on a robust, consistent and comparable basis that meets public expectations.

b.	**Command public, employer and other stakeholder confidence.**

  i.	Ensure that any provision that falls below national expectations can be detected and the issues speedily addressed.

  ii.	Apply transparent processes and judgements, and function in a rigorous, intelligible, proportionate and responsive way.

  iii.	Assure the threshold standards of awards from HEIs in England and Northern Ireland, wherever and however they are delivered.

  iv.	Explain clearly where responsibilities lie for the quality and standards of provision and how they are secured.

c.	**Meet the needs of the funding bodies and of institutions.**

  i.	Enable the funding bodies to discharge their statutory responsibilities to assure the quality of the programmes they fund.

  ii.	Enable institutions to discharge their corporate responsibilities, by providing them with information on how well their own internal systems for quality management and setting and maintaining standards are functioning, and identifying areas for improvement.

d.   **Meet the needs of students.**

  i.   Have current and prospective students' interests at its heart, underlying all of the other principles.

  ii. Engage students in the quality process, whether at course, institutional or national level.

  iii. Focus on the improvement of the students' learning experiences without compromising the accountability element of quality assurance.

e.   **Rely on independent judgement.**

  i.   Incorporate internal reviews that involve external participants.

  ii. Recognise and support the important role of external examining.

  iii. Incorporate external reviews carried out by independent reviewers.

  iv. Incorporate external reviews run by an operationally independent body (the QAA) and professional, statutory and regulatory bodies.

f.   **Support a culture of quality improvement within institutions.**

  i.   Recognise institutional autonomy and responsibility for quality and standards.

  ii. Apply a process of external review, both by academic peers and by students, rather than inspection by a professional inspectorate.

  iii. Include processes based on rigorous institutional self-evaluation.

  iv. Promote self-improvement in institutions (quality enhancement).

  v.   Enable the dissemination of good practice.

g.   **Works effectively and efficiently.**

  i.   Operate efficiently, in order to avoid disproportionate use of institutional effort and resources which could otherwise be directed to the delivery of front-line student teaching.

  ii. Rely on partnership and co-operation between the institutions, the QAA and the funding bodies.

  iii. Address both quality (appropriate and effective teaching, support, assessment and opportunities for learning provided for students) and standards (levels of achievement that a student has to reach to gain an award) as two distinct but interlinked concepts.

  iv. Work on the principle of collecting information once to use in many ways.

  v.   Acknowledge that while the quality assurance system applies to England and Northern Ireland only, it is underpinned by reference tools which are UK-wide.

  vi. Adhere to the Standards and Guidelines for Quality Assurance in the European Higher Education Area (encompassing internal and external quality assurance).

  vii. Maintain sufficient flexibility and responsiveness to meet changing demands and public priorities in a timely manner.

  viii. Complement and avoid duplication with, so far as possible, other assurance processes in HE (for example Ofsted; professional, statutory and regulatory bodies).

Consultation question 2

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

The future of institutional audit

The current institutional audit method

33. Institutional audit is the main form of external scrutiny that is applied by the QAA to individual higher education institutions. The current audit method is the fifth since its introduction in 1991, and it is therefore sensible to consider whether or not it should be continued, either unchanged or modified, or whether some different form of external scrutiny is now required to meet the changing environment.

34. It is important to reflect on the lessons learnt from the experience of the past few years. Audit functions well as an assurance process, provided that the other elements of the quality assurance system are operating efficiently and effectively. These other elements include: the Academic Infrastructure (reference points for all institutions); external examining arrangements; publication of information about teaching quality (including the National Student Survey); institutions' own internal reviews; the QAA's causes for concern process; the work of professional, statutory and regulatory bodies; and the Office of the Independent Adjudicator. (See Annex A for further information.) If evidence were found that these other elements were not operating properly, it might be necessary to consider a more intensive approach to external review.

35. Although we are aware that work is needed to improve some elements of the quality assurance system, the HEFCE TQSE sub-committee found no evidence of systemic failure. Therefore, we recommend a form of external scrutiny based on the institutional audit approach. The procedural and operational detail (the method) to be adopted will depend upon the coverage and focuses of audit, the judgements to be made, and the forms of report required, all of which are discussed later in this document. This consultation does not attempt to go into a level of operational detail, which falls into the area of responsibility of the QAA. Following this consultation, the QAA will carry out its own full consultation in 2010 on the details of how a new audit method will operate in practice, including what information the QAA will require from institutions and when.

Strengths and limitations of the existing audit method

36. There is much to commend the existing audit method:

a. It acknowledges institutional autonomy, so that institutions can provide creative and flexible HE courses to meet the demands of students and employers.

b. It is based on agreed national threshold standards, by subject and by level, set out as reference points (in the Academic Infrastructure).

c. It acknowledges the vital importance of external examiner arrangements, which are unique in the world at undergraduate level[11].

d. The level of demand it places on institutions is, on the whole, considered by most parties to be proportionate. A more intensive and wide-ranging method would be more bureaucratic and would divert funds from front-line teaching and resources.

e. It promotes quality enhancement, in that it is not just about following a process but about making real improvements to the student experience.

f. Institutions can be sure that they have been judged using comparable procedures.

g. It meets European guidelines.

h. It involves students, including as equal members of review teams in many cases.

i. Reports are freely available on the QAA website.

37. Notwithstanding this, the existing method has its limitations:

a. It is difficult for a non-specialist to understand the rationale behind the method, to interpret its outcomes or to understand how it ensures comparability of standards.

b. It is carried out over a fixed cycle, which allows for an element of consistency in the way different institutions are reviewed but means it

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[11] As set out in 'Considering the UK Honours Degree Classification System: International Summary: a report for the QAA/SHEFC Quality Enhancement theme group on Assessment by Critical Thinking' (2004), available at www.enhancementthemes.ac.uk/documents/assessment/JaneDenholmfinalreporthonoursclassificationREVISED200904.pdf

is difficult to make substantial changes to the method. This means that it is difficult to respond convincingly to concerns over a particular aspect of quality or standards (for example assessment or plagiarism) if they arise.

c. The reports produced, while of use to institutions and the funding bodies, are not targeted at a wider audience. People outside the HE sector frequently find them difficult to understand as they are often written in technical language.

d. It only offers a comment, rather than a judgement, on the provision of public information. This differentiation (made for logistical reasons) may give the impression that providing robust and accessible information is of less importance than maintaining quality and standards, but recent criticisms have shown this area to be a concern for many students and organisations.

Characteristics of a revised institutional audit method

38. In order that a revised institutional audit method should meet the needs of the present day and, so far as possible, future challenges, we propose that the QAA be asked to develop a method that is (compared to the current method):

a. More proactive and flexible, able to investigate particular themes or concerns should the need arise.

b. Better explained and presented in reports and handbooks, with the public as a principal audience, using simpler language.

c. Clearer about the importance attached to the provision of robust and comparable public information by institutions.

d. Clearer about the comparability of threshold standards between institutions, including the vital role of the Academic Infrastructure in supporting this.

e. As far as reasonably possible, of no increased overall level of demand, ensuring that maximum funding is devoted directly to learning and teaching.

Focus of a new audit method

39. Institutional audit could examine any of a huge number of topics. As the audit method has evolved, it has tended to move from a position where visit agendas were left largely to the auditors' discretion, to one where a considerable proportion of the topics to be covered is prescribed. Because there is a limited amount of time available to audit teams, whose judgements must be robust and defensible, these topics must be clearly identified and agreed.

40. Although we support the current focuses of institutional audit (as listed in the Institutional Handbook), there are particular issues of public concern that might be further investigated in the new method, whether in every institutional review, in some, or through a form of thematic review. We know that institutions are making great efforts to address these issues, but we may need to do more to demonstrate the impact of these efforts, in order to provide public confidence. We would particularly draw the QAA's attention to:

• the provision of accurate and appropriate information to current and potential students on the nature of the learning experience they can expect

• academic misconduct (for example plagiarism, cheating)

• mechanisms for ensuring high quality and standards for international students, including English language proficiency checks

• staff training and development

• the provision of effective feedback to students on their work.

41. We also want the new method to be flexible. In the light of findings of past audit cycles and current areas of public interest, it is proposed that in the

revised institutional audit method, QAA be asked to enquire into and report on key areas common to all institutions, plus other areas that might vary from institution to institution or from time to time. This would enable audit to respond as appropriate to the different circumstances of different institutions while maintaining comparability across key areas. It would meet the objective of 'maintaining sufficient flexibility and responsiveness to meet changing demands and public priorities in a timely manner' (paragraph 32g.vii). Paragraph 63 suggests how the lists of topics for consideration might change on an ongoing basis.

42. In terms of the key areas common to all institutions, we reassert our commitment to the assurance of the management of quality and standards against the reference points set out in the Academic Infrastructure. We also reassert our commitment to a particularly important aspect of institutional audit, which is the way in which audit teams find it particularly difficult to express confidence if there is not:

• strong and scrupulous use of independent external examiners in summative assessment procedures

• use of independent external participants in internal quality management procedures.

This underlines the principle about externality set out in paragraph 32e.ii-iv.

43. If the response to question 4 below is positive, then the QAA will consult on the detail of key areas as part of its 2010 consultation on the operation of the method.

Consultation question 4

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

Standards

44. Earlier in this document, we stated that the quality assurance system needs to assure the threshold standards of awards (that is, the level of achievement that a student has to reach to gain an award), wherever and however they are delivered.

45. There are currently a number of important ways in which threshold standards are assured across institutions, for example:

a. The Academic Infrastructure, which is a set of 'reference points' for institutional standards. The framework for higher education qualifications sets out the generic outcomes and attainment expected of a student at each level. The subject benchmarks describe what gives a discipline its coherence and identity, and define what can be expected of a graduate in terms of the abilities and skills needed to develop understanding or competence in the subject. For example, there are many different history degrees in England, but every single one should be designed and reviewed against the outcomes set out in the published subject benchmark for history.

b. Institutional audit examines the effectiveness of an institution's arrangements for maintaining appropriate academic standards, against the reference points in the Academic Infrastructure.

c. External examiners, who should operate independently and impartially, are drawn from other institutions or from areas of professional practice and comment on the standards of awards, including undergraduate awards. Further information is provided at paragraphs 75-77.

d. More than 50 professional, statutory and regulatory bodies, such as the General Medical Council and the Institute of Engineering and Technology, review standards for particular courses in order to accredit them.

46. Comparability of standards is an important issue, and we consider that there is scope in institutional audit to strengthen the way standards are approached. We suggest that we should ask the

QAA to consider how it could strengthen audit and/or the Academic Infrastructure to better address the question of comparability of standards, but without compromising institutional autonomy with regard to degree-awarding powers.

Consultation question 5

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

Audit judgements

47. Institutional audit at present results in judgements, which are published. These have considerable repercussions for the reputation of institutions, and can lead to the withdrawal of HEFCE/DEL funding where poor judgements are not speedily addressed. Judgements are made on:

- the confidence that can reasonably be placed in the soundness of the institution's present and likely future management of the academic standards of its awards, and

- the confidence that can reasonably be placed in the soundness of the institution's present and likely future management of the quality of the learning opportunities available to students.

48. Institutions may receive a judgement of 'confidence', 'limited confidence' or 'no confidence' for each of these two areas. Separate but similar judgements are made in respect of provision and awards offered through collaborative arrangements.

49. The current institutional audit method also results in a comment on:

- the institution's arrangements for maintaining appropriate academic standards and quality of provision of postgraduate research programmes

- the institution's approach to developing and implementing institutional strategies for enhancing the quality of its educational provision, both taught and by research

- the reliance that can reasonably be placed on the accuracy and completeness of the information that the institution publishes about the quality of its educational provision and the standards of its awards.

50. The reason for using 'confidence' judgements rather than other forms of words is the need to provide a judgement that can remain valid for the life of the audit cycle (currently six years). Much could change in this time, so the judgements offer a view on the likely sustainability of quality and standards into the future, assuming these are present at the time of the audit.

51. The language in which the judgements are expressed may nevertheless be ambiguous. 'Limited confidence', in particular, is intended to indicate that an institution still meets acceptable levels of quality and/or standards. However, this may not be immediately apparent.

52. We therefore propose that the QAA be asked to review the terms it uses to describe the different levels of confidence expressed in audit judgements, with a view to ensuring that the status of each judgement is clear and unambiguous to all readers.

Consultation question 6

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

Public information

53. A large amount of public information on teaching quality is available. For example, all audit reports can be found on the QAA web-site. A national set of data for all institutions is published on the Unistats web-site, for example on average entry qualifications and completion rates. Institutions also work hard with the NUS to encourage all final-year students to give their opinions on their course to the National Student Survey (NSS); the results are then published by

subject for each institution. The NSS, which gathered the views of more than 220,000 students in 2009 (a 62 per cent response rate), is a major impetus for sustaining and improving quality. In addition, all HEFCE-funded HEIs and FECs, and DEL-funded HEIs, are required to publish their own information on teaching quality, including progression and graduate destinations. Paragraphs 10-12 of Annex A provide further detail.

54. As noted above, QAA auditors examine the information that the institution publishes about the quality of its educational provision and the standards of its awards, and provide a comment on its accuracy. However, they do not provide a judgement, and therefore should the data be considered to be inaccurate, the funding councils do not have the power to demand further action or (in extreme situations) to withdraw funding.

55. Although a large amount of information is available, we consider that there should be improvements to information for prospective students, both in terms of the content and the way in which it is made available.

56. Both the TQSE sub-committee and the IUSS Select Committee reports recommend that students and potential students should have more information on what they can expect from their time in higher education, such as: the teaching and study hours expected; academic and financial support that is available; and clear assessment criteria. Much of this information is often available but may be difficult to find, and practice may vary across different institutions.

57. The TQSE sub-committee has recommended that the whole TQI data set should be reviewed. It has also recommended the development of a universal set of information in a comparable format, following research into understanding the needs of the intended users of the information (students, parents, employers and other stakeholders).

58. In response, HEFCE, with other stakeholders including UUK, GuildHE and the QAA, is reviewing

public information on teaching quality to see what can be improved. The review is being led by the Teaching Quality Information/National Student Survey steering group, who are in the process of commissioning research into the information that students and potential students need from institutions and how best this should be presented. This will be followed by proposals for full consultation in 2010-11 and implementation as soon as possible afterwards. This will ensure that an evidence-based approach is taken to establishing a new common data set. As some of this information is developed on a UK-wide basis, the review will consider how issues affect Scotland and Wales as well as England and Northern Ireland. Details on this review can be found at www.hefce.ac.uk under Learning & teaching/Assuring quality/Teaching Quality Information. Further information can be obtained from Chris Taylor (tel 0117 931 7264, e-mail c.taylor@hefce.ac.uk). The review will consider the National Student Forum's suggestion[12] that information should be available through a single information, advice and guidance portal; this is being explored by the NUS and UCAS.

59. Once a common data set is agreed on and available, it would be feasible to consider changing the existing 'comment' on the reliance that can reasonably be placed on the accuracy and completeness of the information that the institution publishes (for example, on its web-site, or in hard copy) about the quality of its educational provision and the standards of its awards to a 'judgement'. This would help to support the principle of commanding public and stakeholder confidence and assuring the reputation of HE by reinforcing the importance of providing clear and accurate information to students, potential students and other interested parties. Clearly much development work will be required to identify how this would be undertaken and what information would be assessed. We would expect this to be informed by the review and subsequent consultation and to be included in the topics covered by institutional audit.

60. Respondents should note that the consultation on the common data set will not take place until

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12 'Annual report 2008', National Student Forum, available at www.dius.gov.uk under Higher Education/Students/Student Listening Programme/National Student Forum.

late 2010. It is anticipated that any change from a 'comment' to a 'judgement' would not apply from the beginning of the new method in September 2011, but would be introduced at a later stage.

Audit reports

61. Reports of institutional audits currently comprise three parts: a summary, intended for the general public; the report itself, intended for institutional managers and other directly interested parties, such as the funding councils; and a longer, more detailed technical annex designed to meet the needs of quality assurance specialists and practitioners. While this may be an appropriate way of dealing with the different needs of different audiences, the structure and relatively technical vocabulary used in the reports are unlikely to be accessible to a non-specialist audience (potential students, for instance). It is therefore proposed that the QAA be asked to produce the summary reports in an entirely standalone form that does not require any specialist knowledge of quality assurance or of its technical vocabulary. In doing so QAA will, of course, be alert to the need to ensure that the descriptions offered in the summary are entirely consistent with those in the report itself.

Frequency of audit

62. Institutional audits are currently running on a six-year cycle, from 2005 to 2011. The cycle approach allows institutions to know when exactly they can expect an audit visit and plan accordingly. Institutions are audited in a similar way within the cycle, and this means that review outcomes are comparable. But this cycle approach makes it difficult to introduce changes to the method or scope, for example to investigate particular concerns emerging at a sector level.

63. In the light of this, we propose that audits should be organised on a rolling basis. Institutions should still expect to be audited regularly – we would expect that, on average, this will still occur once every six years – and to be given plenty of time to prepare for their audit. We would not expect some institutions to be audited more often than others (unless, as now, an institution's audit was brought forward as a result of the HEFCE policy for addressing unsatisfactory quality or the QAA causes for concern procedure). We would also expect to ensure comparability by ensuring that a consistent 'core' set of topics were always covered in the audit. However, abandoning a fixed cycle approach means that minor changes to procedures and the topics to be considered can be made on an ongoing basis. Following agreement by the Quality Assurance System Group, which will include sector representatives (see paragraphs 69-71) the QAA would be asked to operationalise any changes. More substantial revisions may be introduced after full discussion in the Quality Assurance System Group and, where this group considers it necessary, consultation with the sector.

Possible operational models for the revised institutional audit

64. The QAA requires the freedom to develop the procedures and operational details of the revised audit method in the light of its extensive experience and expertise. We do not therefore intend to make proposals about specific operational models for audit in this consultation. Once we have analysed the results of this consultation, we will ask the QAA to develop an operational description to meet the agreed requirements. The QAA will then discuss possible options with relevant parties, including an open consultation in 2010.

Involvement of students

65. Students, as key participants in higher education and a partner in its delivery, are at the heart of the revised quality assurance system. The QAA has made it clear that it proposes to highlight the importance of this in the draft operational description of the revised institutional audit method, including:

- students' role in preparation for audit

- students' contribution to internal quality assurance procedures

- students' involvement in quality enhancement activities.

66. In accordance with its Student Engagement Strategy, the QAA also proposes to:

- continue to place students in audit teams, as equal members

- continue to include the views of students in audit evidence, via students' written submissions and interviews

- encourage the involvement of students in periodic reviews.

Audit of collaborative provision

67. Institutional audit currently includes consideration of an institution's collaborative activity, either as part of the audit itself or, if the provision is too large and complex to be accommodated properly, as a separate exercise. It is intended that the principles and proposals relating to institutional audit should be applied equally to the audit of collaborative provision.

Quality assurance of work-based learning

68. The development of work-based learning (WBL) in recent years has given rise to understandable concerns that it might need special attention in terms of its quality assurance, or that 'normal' quality assurance mechanisms might unreasonably hinder its growth. The QAA has looked closely at this question and has revised the relevant section of the Code of Practice accordingly. It also issued a statement in 2008 explaining the nature of the issue and why the quality assurance of WBL should not be seen as a particular difficulty. As this is however an important and growing area of higher education, HEFCE has funded the Higher Education Academy (HEA) to work with the QAA and Foundation Degree Forward in commissioning a series of demonstrator projects. These seek to enhance practice in quality assurance aspects of employer-responsive HE and to contribute to QAA guidance on employer engagement. The reports will be published by spring 2010. The proposed specification for institutional audit in this document envisages the inclusion of WBL as an area for routine scrutiny, rather than having its own individual method.

Future management of quality assurance arrangements

69. To manage and develop the new quality assurance system, we are setting up a standing Quality Assurance System Group, jointly owned and serviced by UUK, GuildHE, DEL and HEFCE. This group will have the QAA as its principal adviser, and a broad membership drawn from institutional experts in quality assurance, the Association of Colleges, the HEA and other interested parties. In order to ensure that the group is not inward-focused, but appropriately challenged, we will also invite the NUS and an employer representative (for example, a professional, statutory and regulatory body) to join the group, and the Department for Business, Innovation and Skills to observe meetings. The group will also need

to be mindful of the many points of intersection with Scotland and Wales.

70. The purpose of this group will be to have an oversight of the policy and direction of the quality assurance arrangements for England and Northern Ireland, and to review and propose revisions to it as and when necessary. The group should have the power to recommend minor adjustments to the audit method, but would expect to consult the sector with regard to substantive changes. The terms of reference for the group will be published before the end of the consultation period.

71. The Quality Assurance System Group will meet as soon as possible in 2010. Its first task will be to consider the responses to this consultation document and to advise the UUK and HEFCE Boards and the GuildHE Executive on the way forward.

Other safeguards of quality and standards that do not form part of this consultation

72. There are a number of other important aspects of quality assurance that provide public confidence. These have been or are the subject of other consultations and so we are not consulting on them here. They are described here as intrinsic parts of the quality assurance landscape.

73. There are currently four main strands of work under way to address concerns raised about quality and standards. These are: revisions to audit (the subject of this consultation), a review of public information about quality and standards (described in paragraph 58), a review of the Academic Infrastructure and a review of external examining (these are described below). HEFCE, UUK, GuildHE and QAA will provide up-to-date information on the progress of these activities on their web-sites.

Academic Infrastructure

74. The Academic Infrastructure is a vital part of the quality assurance system, in that it promotes comparability of standards across all UK HE. There is further information in Annex A, paragraphs

13-15. The QAA is undertaking an evaluation of the Academic Infrastructure to see if it is meeting its objectives or is in need of revision. This evaluation is taking into account the views of a wide variety of stakeholders, including institutions and students. As part of the evaluation, a consultative discussion paper will be published in February 2010 which will seek views on how the Academic Infrastructure is used and how any revisions or developments might affect this. Further information about the evaluation is available from Jayne Mitchell (e-mail j.mitchell@qaa.ac.uk).

External examining

75. External examining is a mechanism whereby senior institutional staff examine, monitor, comment on and evaluate examination procedures in another institution. It has traditionally been considered a key means of ensuring comparability of standards and good practice. While the evidence suggests that external examining arrangements are generally robust[13], some improvements need to be made to ensure that external examining continues to fulfil its vital role.

76. To meet this challenge, UUK and GuildHE are leading a review of external examining arrangements. The review will consider and recommend what improvements need to be made to ensure that external examiner arrangements effectively support the comparability of academic standards and are robust enough to meet future challenges. It will co-ordinate with, and inform the activities of, other agencies in this area (the QAA, the HEA) to ensure, on behalf of the sector, the coherent development of, and clear public information about, external examining arrangements. The review will ensure that its work is integrated into the QAA's wider evaluation of the Academic Infrastructure, and the future quality assurance system.

77. Further details are available from Greg Wade at UUK (tel 0207 419 5479, e-mail greg.wade@universitiesuk.ac.uk) and from www.universitiesuk.ac.uk/quality

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[13] See 'Outcomes from institutional audit: external examiners and their reports', QAA (2008) at www.qaa.ac.uk/reviews/institutionalaudit/outcomes/externalexaminers.asp

Integrated Quality and Enhancement Review

78. Integrated Quality and Enhancement Review (IQER) is the method of quality assurance used in FECs. Although the specific operation of IQER is not considered in detail in this consultation, FECs will have a strong interest in the results of any changes to the quality assurance arrangements as a whole because they are likely to affect them – either directly through their inclusion in institutional audit and collaborative provision audit, or through changes made to the IQER process or to the information data set requirements.

79. The current cycle of IQER ends in July 2012, one year after the current cycle of institutional audit ends in July 2011. We therefore propose that considerations of what might come after this IQER cycle ends should be considered in detail and taken outside of this consultation document. This could be taken forward by a specialist HE in FECs sub-group of the Quality Assurance System Group. It should be aligned with the principles and purposes of quality assurance set out earlier in this document, which apply equally to HE in HEIs and HE in FECs.

80. In addition, where an FEC gains foundation or taught degree-awarding powers, the audit method and the judgements made will need to be in line with those for HEIs. The aim will be to ensure that the principles and objectives of the quality assurance system are met by all providers with the power to make HE awards.

Audit of transnational activity

81. The QAA is developing a strategy to cover the quality assurance of transnational educational activities. Because this does not affect all institutions, and is likely to need a different approach because of the different context in which this provision is undertaken, it will be the subject of separate discussion and consultation by the QAA in due course. In the meantime, the QAA intends to continue with its programme of overseas audits.

Quality enhancement

82. We believe that both at institutional and national level, quality assurance and enhancement are intrinsically linked and that this relationship will continue to be an important factor in ensuring the maintenance of quality and standards in the future. Higher education providers already undertake quality enhancement and innovation as part of their daily business, for example in offering new programmes or adjusting older ones, and providing support and professional development for new teaching staff. Enhancement also occurs as a response to feedback, be it from students, internal quality reviews and validation processes, audit or the NSS. Institutions also learn from complaints, including through the national work of the Office of the Independent Adjudicator for Higher Education to identify and help institutions to address patterns in complaints. It is vital that this commitment to enhancement in institutions continues.

83. Nationally, much support is available for this process of enhancement:

Quality Assurance Agency for Higher Education

a. The QAA works in partnership with the providers and funders of higher education, the staff and students in higher education, employers and other stakeholders to enhance the assurance and management of standards and quality in higher education and promote a wider understanding of the value of well-assured standards and quality.

b. The QAA enhancement strategy has a number of components: to support academic standards and their quality assurance through maintenance and updating of the Academic Infrastructure; to support continuous improvement in institutions' quality assurance systems and in external audit and review activities; and to contribute to, stimulate and sometimes lead on national and international developments and projects.

c. Enhancement activities designed to assist institutions in managing their responsibilities for the standards and quality of the education they provide include: briefings; publications; meetings; events; collaborative work with stakeholders and partners, such as the HEA and HEFCE (the report 'Quality enhancement and assurance – a changing picture?' was the result of a joint HEA-QAA-HEFCE enhancement project undertaken with HEIs in England and

Northern Ireland in 2008); and analysis and dissemination of the intelligence from reviews and audits and their evaluations (for example the QAA's 'Outcomes…' series of papers).

d. The QAA also brings information about cases brought to its causes for concern procedure to the UUK/GuildHE/Quality Forum, in order to discuss any patterns with vice-chancellors directly, so that they can be quickly addressed.

Higher Education Academy

a. The HEA exists to support all providers of higher education in offering a high-quality student learning experience. The HEA does this at individual, subject and institutional level by: using and encouraging an evidence-informed approach; brokering and sharing effective practice; supporting institutions in strategic change; informing, influencing and interpreting policy; and raising the status of teaching. Some of the ways in which it pursues an enhancement role include: working with subject communities to improve assessment practice; promoting benchmarking of practice in using learning technology; and supporting institutions participating in the flexible learning pathfinder scheme.

b. The HEA also accredits professional development provision, and supports the National Professional Teaching Standards Framework for teaching and supporting learning in HE, which it is currently reviewing. This is an important mechanism for improving the training and development of all those who teach, and thus improving the quality of the student experience.

Proposed timetable

2010

Early 2010	First meeting of Quality Assurance System group
5 March 2010	Closing date for this consultation
Second half of March 2010	UUK, GuildHE, HEFCE and DEL to discuss the results of this consultation with the QAA, NUS and Association of Colleges
April and May 2010	UUK, GuildHE and HEFCE to agree a joint way forward, and to advise the QAA of the specification for the principles and intended outcomes of a revised quality assurance system
Autumn 2010	QAA consultation on operational description (the detail of how institutional audit will operate)
Early 2011	Agreement on final method
Early 2011	Final handbook and operational description produced. Training/briefing of auditors begins.
AY 2011-12	Audit process begins, with the first self-evaluation documents being submitted in autumn 2011

Consultation question 10

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

Annex A

Outline of the current quality assurance arrangements

The Quality Assurance Framework

1. Any quality assurance regime needs to consider both quality and standards. 'Quality' refers to ensuring that appropriate and effective teaching, support, assessment and opportunities for learning are provided for students. 'Standards' refers to the level of achievement that a student has to reach to gain an award (for example a degree). The funding councils have a statutory duty, under the 1992 Further and Higher Education Act, to make sure that quality is assessed. Institutions themselves manage the quality of teaching and learning and are responsible for setting and maintaining the standards of the awards they offer.

2. The QAA was formed in 1997, bringing together the sector-owned Higher Education Quality Council (which audited institutions' management of their own internal quality assurance processes) and the quality assessment divisions of the funding councils. Following the strenuous and resource-intensive twin-track approach of quality audit and subject review, a new regime was introduced in 2002. This re-emphasised the principle of institutional autonomy and self-regulation, aimed at reducing the resources that institutions needed to devote to external accountability, while still providing reliable independent external judgements on the assurance of quality and standards in individual institutions and allowing for a diversity of institutions and programmes.

3. This regime, sometimes called the 'Quality Assurance Framework' (QAF) was designed to encompass a number of elements that, together, would provide systematic coverage of the key essentials of academic quality and standards in higher education. In outline, the envisaged framework consisted of: rigorous validations and periodic internal reviews by institutions of their academic activities; external scrutiny through QAA's institutional audit procedure of the effectiveness of these processes and more general assurance and enhancement mechanisms; and the provision, by institutions themselves, of accurate and up-to-date public information about the quality and standards of their programmes and awards. It excluded specific external judgements on the quality and standards of individual subjects or programmes.

4. The QAF was introduced in 2002 and reviewed and updated in 2004 by the Quality Assurance Framework Review Group (serviced by all three sponsor bodies – HEFCE, Universities UK and GuildHE), with the close involvement of the QAA. This led to the streamlining of the institutional audit method, improvements to public information and a revised method for assuring the quality of collaborative provision.

5. At present, the external components of the Quality Assurance Framework consist of:

*   institutional audits, carried out by the QAA

*   collaborative provision audits carried out by the QAA, to supplement institutional audits for those HEIs with large or complex collaborative provision that cannot be accommodated within a regular institutional audit

*   the publication of information about quality and standards, to help potential students (and their parents and advisers) make choices about where to apply to study. The information, which includes the results of the National Student Survey, is published on the Unistats web-site, www.unistats.com. Institutions are also expected to make certain information about the quality and standards of their programmes publicly available.

6. It is important to note that the QAF is based on HEIs having primary responsibility for their own quality and standards and having internal procedures in place to ensure that they are satisfactory. Institutional audit tests that these procedures are in place and operating effectively.

Institutional audit

7. Institutional audit compares institutional claims with evidence and judges them against criteria. The 'claims' have taken different forms over the years, from documents illustrating policies and practices, to specially written self-evaluation submissions. Similarly the 'evidence' has at times included primary sources, such as external examiners' reports, course approval documentation and oral evidence from groups of staff and students, as well as secondary evidence in the form of analyses and reports specially prepared for the audit. The

'criteria' have shifted since the introduction of audit from an institution's own aims and objectives to the expectations of the Academic Infrastructure, although there has not been a requirement for rigid compliance with all the individual elements of this.

8. Institutional audit is by its nature a 'sampling' technique, rather than a comprehensive scrutiny of all institutional activity. It therefore considers the key points at which quality and standards are secured and revealed. This is cost-effective, allowing a judgement to be made in a limited time, using limited resources. It avoids duplication with institutions' own quality assurance procedures and is concerned to ensure both that those are fit for purpose and that their purposes are appropriate. However, institutional audit cannot (and is not designed to) offer a systematic assessment of all programmes and awards in an institution.

9. A full description of the audit method is set out in the Handbook for Institutional Audit available at www.qaa.ac.uk under Publications.

Public information on quality (Teaching Quality Information)

10. Any quality assurance system must ensure that adequate public information on quality and standards is provided, both for assurance and to enable prospective students to make an informed choice about where to apply to study. It should also provide the opportunity to compare information and statistics on a range of topics. The Unistats web-site (developed by UCAS and jointly funded by all four UK funding bodies) was developed as a response to this need. At the moment the following information is published on the Unistats web-site, at subject level where possible, for all HEFCE and DEL-funded HEIs and HEFCE-funded FECs:

- results of the National Student Survey (feedback from final-year undergraduates on their satisfaction with their courses)

- data about an institution's current student body – entry qualifications and UCAS tariff, continuation and achievement

- Destinations of Leavers from Higher Education (DLHE) survey data – destinations of leavers, job categories and job types (this is still being developed for directly funded provision in FECs)

- context statistics – student domicile, age, level of study, gender, study mode.

11. The collection, provision and review of this information are major drivers of quality. This applies particularly to the National Student Survey, which had more than 220,000 respondents in 2009.

12. In addition, institutions are expected to make the following information publicly available[14]:

- information on institutional context, for example:

  – mission statement

  – sections of corporate plan

  – statement of quality assurance policies and processes

  – learning and teaching strategy

- information about the quality and standards of programmes, for example:

  – programme specifications

  – information about procedures and outcomes for programme approval, monitoring and review

  – details of accreditation by professional, statutory and regulatory bodies

  – arrangements for assessment and external examination procedures

  – results of internal student surveys.

  – information about links with employers.

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[14] For HEIs this list of information was published in 'Review of the Quality Assurance Framework: Phase two outcomes' (HEFCE 2006/45), Annex F. For HE delivered in FECs a similar list can be found in Annex D of the IQER handbook (see www.qaa.ac.uk under Publications).

The Academic Infrastructure

13. The UK does not have a national curriculum for higher education, or national examinations for degrees. HEIs with degree-awarding powers are individually responsible for the standards of the qualifications they award. In order to maintain the coherence and integrity of a higher education system covering all institutions in the UK, the QAF has as its structural foundations four elements of the Academic Infrastructure[15]:

- programme specifications – concise descriptions of the intended learning outcomes from a higher education programme, and how these outcomes can be achieved and demonstrated

- the frameworks for HE qualifications, which define the level of achievement expected at each stage of study

- subject benchmark statements, which describe the key aspects of a particular discipline and describe the skills and abilities that a student of that discipline should acquire

- a Code of Practice in 10 sections covering themes such as external examiners and student assessment.

14. This set of UK-wide reference points, which was developed and is maintained by the QAA in conjunction with the HE sector, constitutes the common basis for the establishment and maintenance of academic quality and standards in the UK, and provides the boundaries within which institutions' autonomy is exercised in these areas.

15. Although the Academic Infrastructure is intended principally as a set of agreed reference points to describe academic standards in the UK, it is also used as the basis for the scrutiny of quality and standards by the QAA in its institutional audits. It contributes to ensuring comparability of standards between awards. For similar awards, the threshold level of student achievement – the 'academic standards' – should be broadly equivalent across the UK and the Academic Infrastructure helps to ensure this. In making judgements, institutional audit teams draw on the Academic Infrastructure, looking for evidence that it is carefully considered.

Other procedures for assuring quality and standards

QAA causes for concern procedure

16. QAA's causes for concern procedure[16] allows any organisation or individual to ask the QAA to investigate concerns about an English institution's management of the academic standards and quality of any of its HE programmes and/or awards. The appropriate consequences in the case of a cause for concern being substantiated in whole or in part will depend on the nature, extent and seriousness of the concern. Action plans will be required, and an institution's next scheduled institutional audit or review may be brought forward. The procedure is also an important part of HEFCE's policy on addressing unsatisfactory quality.

HEFCE policy on unsatisfactory quality

17. HEFCE's policy for addressing unsatisfactory quality in institutions[17] sets out clearly the process and sanctions, including withdrawal of funding and additional student numbers, that will be invoked where an institution receives a 'no confidence' judgement from the QAA in its institutional audit or Integrated Quality and Enhancement Review (IQER).

Office of the Independent Adjudicator for Higher Education

18. All institutions in England subscribe to the Office of the Independent Adjudicator for Higher Education (OIA), which has the power to investigate student complaints, and to recommend an institution to pay compensation and change its procedures should the complaint be upheld. This is an important and independent recourse for students. We support close linkages between the OIA and the QAA to ensure that a one-off complaint is not indicative of a more systemic issue. At the time of writing, no institution has failed to comply with a recommendation of the OIA.

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[15] For more information on the Academic Infrastructure see www.qaa.ac.uk/academicinfrastructure/default.asp

[16] Further information can be found at www.qaa.ac.uk/causesforconcern/concern.asp

[17] 'Policy for addressing unsatisfactory quality in institutions' (HEFCE 2009/31).

Professional, statutory and regulatory bodies

19. 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. Accreditation ensures that standards, in terms of the syllabus taught and the outcomes that students achieve, meet expectations for professional membership and/or practice. For example, the General Medical Council accredits courses in Medicine and the Institution of Engineering and Technology accredits various engineering courses. A 2005 report noted that more than 50 bodies were involved in reviewing quality and standards in universities and colleges, and each institution interacted with a different combination of these depending on the range of programmes it offered[18]. We are asking the QAA to continue to work with these other bodies to ensure that their quality assurance processes complement, so far as possible, other assurance processes in HE, to ensure a more streamlined approach to quality assurance.

Other reference points

20. Alongside the Academic Infrastructure, other national frameworks exist to ensure comparability of standards. The HE credit framework for England[19] provides guidelines to aid and assist institutions in the operation of credit accumulation and transfer. The QAA has also worked with the sector to agree guidelines on the accreditation of prior learning.

Further education colleges

21. FECs are not subscribers to the QAA and HEFCE has a responsibility only for their higher education activities. However, efforts have been made in recent years to ensure that the quality assurance system used for HEFCE-funded HE in FECs resembles that used for HE in HEIs, so far as appropriate, so that the student studying HE in an FEC can expect an experience comparable to that of the student studying HE in an HEI. This requires the principles and purposes of quality assurance to be the same, wherever and however the HE is delivered.

22. At present no college has powers to award its own higher education qualifications[20]. They work with awarding bodies, generally Edexcel and/or one or more HEIs. The awarding bodies retain responsibility for the academic standards of all awards granted in their names and for ensuring that the quality of the learning opportunities offered through collaborative arrangements enables students to achieve the academic standard required for their awards.

23. IQER, the external review procedure operated by the QAA on HEFCE's behalf in FECs, focuses on how colleges discharge their responsibilities within the context of their agreements with their awarding bodies. The QAA reviews the responsibilities of the HEIs within these relationships through institutional audit/collaborative provision audit.

24. FECs are also expected to draw on, and refer to as appropriate, elements of the Academic Infrastructure in their arrangements for HE.

25. Information about the quality and standards of HEFCE-funded HE in FECs is published on the Unistats web-site, using a very similar data set to that used for HEIs. FECs are also expected to make certain institutional or programme-level information publicly available.

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[18] 'The costs and benefits of external review of quality assurance in higher education', report by J M Consulting to HEFCE, Universities UK, the Standing Conference of Principals, the Department for Education and Skills and the Quality Assurance Framework Review Group (July 2005).

[19] 'Higher education credit framework for England: guidance on academic credit arrangements in higher education in England', available from www.qaa.ac.uk/england/credit/default.asp

[20] The 2007 Further Education and Training Act provides for colleges to apply for foundation degree awarding powers.

Annex B

Summary of consultation questions

Responses should be made online by **Friday 5 March 2010** using the response form which can be accessed on the HEFCE web-site alongside this document at www.hefce.ac.uk/pubs/hefce/2009/09_47.

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

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

Please add any comments:

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

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

Please add any comments:

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

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

Please add any comments:

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

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

Please add any comments:

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

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

Please add any comments:

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

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

Please add any comments:

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Consultation question 7: Subject to sector agreement on the data that the institution makes available to inform prospective students and other interested parties about the quality of its educational provision and the standards of its awards:

Do you agree that institutional audit should make a judgement about the reliance that can reasonably be placed on the accuracy and completeness of this information?

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

Please add any comments:

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

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

Please add any comments:

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

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

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

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

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List of abbreviations

DEL	Department for Employment and Learning (in Northern Ireland)
FEC	Further education college
HE	Higher education
HEA	Higher Education Academy
HEFCE	Higher Education Funding Council for England
HEI	Higher education institution
IQER	Integrated Quality and Enhancement Review
IUSS	Innovation, Universities, Science and Skills [Select Committee]
NSS	National Student Survey
NUS	National Union of Students
OIA	Office of the Independent Adjudicator for Higher Education
PSRBs	Professional, statutory and regulatory bodies
QAA	Quality Assurance Agency for Higher Education
QAF	Quality Assurance Framework
TQI	Teaching Quality Information
TQSE	Teaching, Quality, and the Student Experience (a HEFCE Strategic Committee)
UUK	Universities UK
WBL	Work-based learning