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Issues paper

Report of sub-committee

This report is for information

In November 2008, the Teaching, Quality and the Student Experience sub-committee was formed to investigate concerns raised over the quality of English higher education. This document reports on the work of the sub-committee and sets out its recommendations.

Report of the sub-committee for Teaching, Quality, and the Student Experience

**HEFCE's statutory responsibility for
quality assurance**

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Foreword from the Chair

As chair of the sub-committee which produced this report for the Higher Education Funding Council for England (HEFCE), I am pleased to introduce it. While commissioned for the specific purpose of advising HEFCE on its statutory obligations with respect to quality and standards in the English higher education sector, the report inevitably has wider ramifications. Its recommendations concerning the external examiner system, the kinds of information that higher education institutions (HEIs) should provide and that students need, and the future role of the Quality Assurance Agency (QAA) will be of interest across and beyond the sector. It reflects a growing interest by the public and by Government in the quality of English higher education, an interest shown by the recent wide-ranging enquiry 'Students and Universities' carried out by the Innovation, Universities, Science and Skills Select Committee chaired by Phil Willis MP.

The sub-committee, in advising HEFCE, came to the conclusion that while there is no systemic failure in quality and standards in English higher education, there are clear areas for improvement. The external examiner system is nothing like as dysfunctional as some would have us believe, but it would certainly benefit from a review and from a strengthening of external examiners' powers. The need for information in a format that is easily understandable – and that corresponds with what applicants, students, parents, employers and other stakeholders actually want to know – is paramount. This will oblige HEIs to provide information in a more standard, accessible format and will require significant changes to the role of the QAA. It is essential, above all, that the QAA comes to regard itself as a public-facing organisation whose job it is not only to assure quality, but also to explain how and why the public should have confidence in English higher education. It is striking, for example, that in a report of over 100 pages that contain a wealth of useful information, the IUSS Select Committee omits mention of the subject benchmarking process by which orientation points have been set for the standards to be reached for each subject in university-level study. If a House of Commons Select Committee can overlook such a key element in the methodology of standard-setting in universities, there is little hope for ordinary members of the public unless there is a radical change to the way in which information about quality and standards is provided.

The TQSE sub-committee's report makes proposals that it believes are proportionate and practical. They are not the product of a complacent approach; the seriousness with which all parts of the sector takes these issues emerged with unmistakable clarity from the committee's investigations. Sensible reform will only be possible if all parts of the sector are able to work together with the funding councils and Government in agreeing a framework for quality assurance and enhancement that will satisfy both the sector and its stakeholders. HEFCE, the sub-committee argues, has a legitimate interest in the means by which HEIs maintain standards, and a statutory obligation to make provision for the assurance of quality. HEFCE can best discharge this obligation through a co-operative approach, with involvement and engagement from the sector and all bodies and organisations connected with this area.

Professor Colin Riordan, Chair, Sub-committee for Teaching, Quality, and the Student Experience

October 2009

Report of the sub-committee for Teaching, Quality, and the Student Experience

HEFCE's statutory responsibility for quality assurance

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Of interest to those responsible for	Quality assurance
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Executive summary

Purpose

1. In November 2008, the Teaching, Quality, and the Student Experience (TQSE) sub-committee was formed to investigate concerns raised over the quality of English higher education (HE). This document reports on the work of the sub-committee and sets out its recommendations.

Key points

2. This report has been produced in response to concerns raised in the public domain during 2008 – most notably in national media, but also in published reports – over perceived threats to quality and standards in English higher education.

3. The Higher Education Funding Council for England (HEFCE), which has a statutory duty to ensure that provision is made for assessing the quality of education in institutions it funds, took these concerns very seriously. The HEFCE Board and its strategic committee for Teaching, Quality and the Student Experience agreed to set up a TQSE sub-committee specifically to investigate these concerns and consider:

- whether the concerns were substantiated
- how public confidence in the quality and standards of the HE sector might be maintained and where necessary restored
- whether there was a risk that HEFCE's statutory duty might be compromised
- what actions should be recommended to HEFCE and others as a result.

4. In considering these issues, the sub-committee had to bear in mind that HEFCE is only one of a number of organisations with an interest in quality and standards. Most notably, higher education institutions (HEIs) are responsible for setting and maintaining the standards of the awards they offer with reference to sector-agreed benchmarks. The Quality Assurance Agency for Higher Education (QAA) carries out evaluations of academic quality and is responsible for maintaining the Academic Infrastructure against which standards are referenced. Public, statutory and regulatory bodies also contribute to this area. All these organisations and others need to work together in maintaining the quality and standards, and hence the reputation, of English higher education. Members of the sub-committee also bore in mind that some elements of quality assurance apply to the whole UK higher education sector. For example, the Academic Infrastructure is a national framework, and some of the reports and evidence used refer to HE throughout the UK, rather than England only.

5. The current cycle of institutional audit, the quality assurance method used in English HEIs, comes to an end in 2010-11. The sub-committee therefore had an opportunity to make recommendations on how the method could be revised to address some of the concerns.

6. The sub-committee's overall conclusion is that there is no systemic failure in quality and standards in English higher education. It did however identify several areas of concern which need to be addressed if the effectiveness of the quality assurance system is to be maintained in the future.

Areas of concern considered by the sub-committee

7. The committee considered a wide range of evidence sources in relation to the following key areas of concern.

8. *Admissions procedures.* The sector faced allegations that students who would not be able to benefit from higher education were being admitted to HE, and in particular that international students were admitted without sufficient ability in English to undertake HE study. The sub-committee considered that, overall, admissions procedures were sound, but that clearer guidance and better support should be provided to international students.

9. *Degree classifications.* There has been considerable debate as to whether the increasing proportion of first and upper second class degrees being awarded represents 'grade inflation'. The sub-committee considered the work of the Measuring and Recording Student Achievement Group (the Burgess Group). It endorsed the Burgess Group's findings that the traditional degree classification system is no longer fit for purpose – though this is a view of how results are presented, not on degree standards themselves – and the continuing work on the Higher Education Achievement Report.

10. *Plagiarism.* Media reports have suggested that plagiarism in higher education is widespread and increasing. Internet usage and the move away from reliance on traditional examinations as an exclusive assessment method have clearly had an effect. However, the sub-committee considered that while plagiarism cannot be regulated out of existence, there is a verifiable commitment to reducing its incidence to an absolute minimum. The sub-committee believed that better publicity for the effective work being

undertaken to prevent and counteract plagiarism within institutions and in the wider HE sector would do much to alleviate public concerns.

11. *External examiners.* The external examiner system is often held up as a means of ensuring comparability of standards and good practice. However, individual examiners' experience is limited to the organisations in which they have worked, so it is arguable whether they can provide such reassurance at national level. Allegations have been made of institutions pressurising external examiners to pass students, or simply ignoring their advice. In addition, the external examiner's role is not well understood by the wider public. The sub-committee recommends a review of the external examiner system. This should consider clarification of the examiner's role and the provision of an independent recourse for examiners to raise concerns, along with greater scrutiny of external examiners' views during institutional audits.

12. *Assessment and feedback.* A number of reports have identified assessment as a challenging area for the HE sector, particularly as student numbers increase. Student surveys also regularly identify the need to improve the type and amount of feedback given to students. The sub-committee recommends that institutions should continue to improve and promote their assessment systems and criteria as well as their processes for offering formative feedback, and make sure that students understand the processes.

13. *Contact time and learning hours.* There is increasing debate over whether UK HE students receive fewer contact hours and undertake less study time than those in other countries. The sub-committee considered that quantity of teaching time does not necessarily equate with the quality of teaching or learning, and a diversity of approaches is desirable. However, students entering UK HE would clearly benefit from further guidance on what to expect from their experience, of which independent, self-guided learning is a crucial part. Institutions also clearly need to provide information in an appropriate common format. This should cover the nature and amount of staff contact that students may expect, the nature of the learning effort expected, the time this will take, and the academic support likely to be available. Institutions should also publicise a clear rationale for the contact hours required for individual programmes, and explain how these relate to other resources.

14. *Institutional audit method.* The sub-committee considered whether the existing audit method was adequate for meeting HEFCE's statutory requirements. Institutional audit has many strengths and has successfully identified problems in a few institutions. However, it provides very broad judgements (contrasted with a high level of technical detail in audit reports), which are of limited use for a wider audience. Locking the method into a six-year cycle also means that it lacks flexibility, as significant changes cannot be made during this time, and nor can a particular sector-wide 'theme' of concern be investigated should the need arise. The sub-committee considered that the current audit method, if continued, will not provide HEFCE with sufficient evidence to fulfil its statutory duty. It proposed some revisions for HEFCE to consider with the representative bodies and QAA.

15. *Public information.* The sub-committee considered that two main types of information should be published: information about quality indicators and similar comparable information, which HEFCE specifically requires to fulfil its statutory duty; and

information about the wider student experience, aimed at a public audience, which needs to be clearly formulated and widely accessible. The data published on the Unistats website may not always fulfil either role, although the National Student Survey is valuable and has achieved wide recognition. The sub-committee recommends a full review of information needs and a common approach to publishing key institutional information, including on institutions' own web-sites.

Conclusions

16. The sub-committee does not consider there to be a systemic failure in quality in English HE. However, challenges to quality and standards are serious issues and the sector cannot be complacent. The Quality Assurance Framework needs revising, to provide HEFCE with continued reassurance that its statutory duty is being fulfilled, and to respond more flexibly to sector trends. The way in which external examiners are used needs reviewing to ensure that the system contributes effectively to maintaining public confidence in quality and standards. The greatest need, however, is for more accessible public information about quality and standards, and about the wider student experience. This will be a challenge for HEFCE and for institutions, but will put the sector on a firmer footing to meet future challenges and show more transparency in how it is accountable.

Action required

17. Many of the sub-committee's recommendations require action from institutions, in particular producing better, clearer guidance about various aspects of their provision and quality assurance systems. Institutions should consider how they might best address these recommendations.

Introduction

1. This document represents the conclusion of the work of the sub-committee of HEFCE's strategic committee for Teaching, Quality and the Student Experience (TQSE) in considering the Council's approach to quality and standards in the English higher education (HE) sector.
2. The resulting report has its origin in summer 2008, when a number of concerns were raised in the media and elsewhere about perceived problems in the quality and standards of higher education provision. The high profile of these concerns meant that there was a risk of damage to public confidence in the higher education sector. It was clear that English higher education needed to be better placed to respond in the future.
3. The Higher Education Funding Council for England took these concerns very seriously, and established the TQSE sub-committee to advise on responding to them. The sub-committee's approach was threefold:
 - a. Establish whether the concerns were substantiated.
 - b. Consider how public confidence in the quality and standards of the HE sector might be maintained and where necessary restored.¹
 - c. Determine whether HEFCE's statutory duty to make provision for assessing the quality of HE in institutions it funds might be compromised as a result.

This report considers these issues in greater detail.

4. The purpose of the report is to provide HEFCE with advice on how it may best fulfil its statutory duty for quality assurance. The report therefore places the concerns within the context of the quality assurance framework (QAF) and makes recommendations as to what HEFCE should seek from the QAF in future in terms of assurance and information. This will be particularly important after 2011, when the current audit cycle ends.
5. The sub-committee is keenly aware that HEFCE and the sector own the QAF jointly. In taking the recommendations forward, the Council will need to agree next steps with key stakeholders, including Universities UK (UUK), GuildHE, the Association of Colleges and the National Union of Students (NUS). HEFCE, UUK and GuildHE will then issue a joint consultation to the sector.
6. The sub-committee thought, however, that it was also important to consider areas that might strictly or traditionally be considered 'outside HEFCE's remit'. As a provider of public funding, HEFCE has a legitimate interest in both the quality and standards of the provision it funds – partly because of its statutory duty, but fundamentally because of its responsibility for ensuring that the public funding it disburses is put to good use. If standards and quality continue to be questioned and assurance cannot readily be

¹ Throughout this report, the word 'public' should be taken to mean those who are not HE professionals but have a strong interest in HE, notably students and potential students, their parents and advisers, employers and the national press.

supplied at a time when regulatory systems are coming under increased scrutiny, then the potential for damage to the reputation of English higher education is high, both at home and abroad.

Background

7. This section is provided to offer readers the opportunity to consider the sub-committee's conclusions with an informed understanding of the background and context to the work.

8. The sub-committee took into account the different responsibilities of a wide and varied range of bodies for quality assurance. HEFCE, the Quality Assurance Agency for Higher Education (QAA) and HE providers themselves all have their own responsibilities in this regard, and several other organisations also have a role. The following discussion aims to clarify some of these different areas.

HEFCE's statutory responsibility

9. HEFCE was established by the 1992 Further and Higher Education Act. Section 70(1) of the Act states that:

Each council shall

(a) secure that provision is made for assessing the quality of education provided in institutions for whose activities they provide, or are considering providing, financial support under this Part of this Act, and

(b) establish a committee, to be known as the "Quality Assessment Committee", with the function of giving them advice on the discharge of their duty under paragraph (a) above and such other functions as may be conferred on the committee by the council.

10. Since 1997, HEFCE has fulfilled this statutory duty by contracting with QAA to carry out assessments of quality on its behalf. Since 2002, HEFCE has also provided for the publication of robust and comparable public information on teaching quality, including the National Student Survey (NSS). The TQSE strategic committee fulfils the role of the Quality Assessment Committee.

11. The Secretary of State retains a reserve power to ask any two or more funding councils to make provision for the assessment of academic standards (section 82(2) of the Act). This power has not been invoked.

12. The TQSE committee is responsible for carrying out the duties of the Quality Assurance Committee referred to in the 1992 Act – that is, advising HEFCE on discharging its statutory duty. The sub-committee was set up to provide a sharper focus on this function.

The Quality Assurance Framework

13. From 1993 to 1997, HEFCE carried out its own quality assessment programmes. Since 1997, HEFCE has contracted with QAA for review and other services.²

14. QAA is an independent body, established as a company limited by guarantee and having charitable status. The company's 'members' are sector representative bodies, including UUK and GuildHE, but it has no formal links to government or individual higher education institutions (HEIs). It receives funding from HEFCE and other funding councils through contracts, and from HEIs through subscriptions, but is operationally independent from these bodies in its day-to-day functioning. Funders endorse the annual programme of work, but have no influence over the appointment of auditors or reviewers, and nor can they influence the content or outcome of an individual institution's audit or review.

15. QAA checks how well institutions meet their responsibilities for maintaining academic standards and quality, identifies good practice and makes recommendations for improvement. It also publishes good practice information to help institutions to develop effective quality assurance systems.

16. Between its foundation in 1997 and 2001, QAA conducted two separate review processes in English HEIs: one covering institutional management of quality and standards (institutional audit), the other the quality of teaching and the standards of awards at subject level (subject review). The outcomes generally demonstrated high quality and standards across the sector. In 2001, following an announcement by the Secretary of State that the burden of HE quality assurance was too great and should be reduced, the Council agreed with the sector representative bodies UUK and GuildHE (then the Standing Conference of Principals), the then Department for Education and Skills and QAA to move to a revised Quality Assurance Framework for England. The QAF represents a unique balance between public accountability and institutional autonomy. It was jointly agreed by HEFCE, UUK and GuildHE. In its current form the QAF comprises:

- institutional audits by QAA
- collaborative provision audits (CPAs) to supplement institutional audits for those HEIs with large or complex collaborative provision
- publication of information on quality and standards, to help potential students (and their parents and advisers) to make choices about where to study. This Teaching Quality Information (TQI) consists of a standard set of subject-level data, including student continuation rates, employment destinations and the results of the NSS. The dataset is published by Unistats (www.unistats.com). Institutions are also expected to make some institutional and programme-level information publicly available, e.g. on their web-sites.

²The QAA-HEFCE contract can be viewed on the HEFCE web-site at:
www.hefce.ac.uk/AboutUs/related/gaa.pdf

17. The revised QAF is informed by the following principles:
- a. Recognition that it is primarily the responsibility of each HEI to: operate robust internal mechanisms for setting, maintaining and reviewing quality and standards; generate information about its quality and standards; and publish the key parts of that information.
 - b. Meeting public information needs, so that stakeholders and – above all – potential students can obtain up-to-date, consistent and reliable information about the quality and standards of teaching and learning at different institutions and in different subjects (student feedback is an important part of this).
 - c. Lightness of touch, to reduce the burden on institutions to the minimum consistent with proper accountability and with meeting information needs, and thus to secure the greatest value from the resources used.
18. The revised quality assurance processes were implemented through a transitional cycle between 2002 and 2005, when each HEI received one or more ‘developmental engagements’ (except those audited in the first year) and an institutional audit. Following this, institutional audit moved to a six-year cycle for 2005-06 to 2010-11.
19. Between 2004 and 2008, the Quality Assurance Framework Review Group (QAFRG) reviewed the effectiveness of the QAF. The QAFRG was jointly owned by HEFCE, UUK and GuildHE and was chaired by Dame Sandra Burslem. Recommendations from this group have been incorporated into the audit method and TQI dataset.³

Audit and review processes

20. The principle of HEIs’ autonomy and responsibility for their own standards and internal quality systems means that the QAF is informed to a large extent by institutions’ own internal mechanisms, in particular their quality assurance reviews, and the use of the external examiner system. Institutional audits check whether these are functioning effectively. Such internal processes therefore need to be considered in discussions about the QAF as a whole.
21. The whole process for institutional audit (including preparation, briefing visits, the audit visit itself and subsequent drafting of the report) can take nearly a year. An audit team normally comprises four auditors and an audit secretary. These are staff from the sector, and are trained by QAA. From spring 2010, a student auditor may also form part of the team unless the HEI specifically opts out of this.
22. Before the main visit, the audit team considers briefing documents provided by the HEI and by student representatives, and discusses them in a three-day briefing visit to the institution in advance of the main audit. This procedure identifies detailed lines of enquiry for the main audit visit. The audit takes approximately five working days; up to

³ The QAFRG produced three reports, accessible through the ‘Publications’ section of HEFCE’s web-site. Links to all three are at: www.hefce.ac.uk/learning/qual/qaf/

four of the days involve meetings between the audit team and staff and students of the institution and, if relevant, its collaborative partners, as well as further study of documentation. On the final day, the audit team makes preliminary decisions about its judgements (see below), any areas of good practice that merit highlighting, and any recommendations for action by the institution. After the audit, a full report is prepared. The institution is given an opportunity to respond to this report before it is published, approximately 20 weeks after the visit.

23. An important feature of the process is that it is entirely independent. No external organisation, including HEFCE, is able to influence it or direct the auditors in any way.

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

Each of these judgements may be expressed as 'confidence', 'limited confidence' or 'no confidence'.⁴ Judgements may also be differentiated, for example to separate collaborative provision from the institution's own provision, or 'present' and 'future' management (see Annex C for a summary of results). Reports include recommendations for the institution's consideration. These may be 'essential' (matters putting quality and/or standards at risk and requiring urgent corrective action), 'advisable' (matters with the potential to put quality and/or standards at risk and requiring preventive or corrective action), or 'desirable' (matters which could potentially improve quality and standards).

25. Higher education delivered in further education colleges (HE in FECs) is assessed using Integrated Quality and Enhancement Review (IQER). This is also a peer review system, and involves two visits. The first is a developmental engagement, which aims to support colleges in reviewing and improving the management of their HE by focusing on a specific area and recommending improvements. The results of this are not published. The second visit, the summative review, looks at all aspects of a college's management of its HE and results in a published report. The summative review results in similar judgements to audit, of 'confidence', 'limited confidence' or 'no confidence' about the college's management of its responsibilities for academic standards (in the context of relevant agreements with awarding bodies) and the quality of learning opportunities, together with an evaluation of the effectiveness of the college's procedures for ensuring the accuracy and completeness of the information it is responsible for publishing.

26. If an institution receives a judgement of 'limited confidence' or 'no confidence', it is required to produce and implement an action plan to address issues within a set timeframe. If an institution is unable to resolve the issues that led to a 'no confidence'

⁴ A full account of the criteria used to make these judgements can be found in Annex E of the QAA 'Handbook for institutional audit', at:

www.qaa.ac.uk/reviews/institutionalAudit/handbook2006/default.asp#p7

judgement, HEFCE is empowered to institute sanctions, such as preventing the institution from applying for additional student numbers and, ultimately, the withdrawal of funding.⁵ These sanctions would not apply in the case of a 'limited confidence' judgement as the institution is still judged to be operating above a minimum quality threshold, albeit with some concerns that must be addressed.

27. In institutional audit, QAA officers undertake a 'mid-cycle follow-up' approximately three years after the main institutional audit visit. This is a desk-based exercise that provides a 'health check' on an institution's continuing management of academic standards and quality of provision. It is an opportunity to reflect on developments made in the management of standards and quality within the institution since the previous institutional audit and, in the context of that audit's findings, for QAA to advise the institution of any matters with the potential to be of particular interest to the team that conducts the institution's next audit.

28. HEFCE receives regular reports from QAA on the results of audit and review, as well as an annual overview report which provides commentary on themes and trends in quality and standards. Additionally, from time to time QAA publishes reports on overarching themes that are based on audit (see Annex D).

Teaching Quality Information

29. In establishing institutional audit, it was recognised that the subject-level information from the former academic review method was lost. The TQI dataset was intended, in part, to address this. It consists of the following data, at subject level where possible, for all HEFCE-funded HEIs and FECs:

- National Student Survey results (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.

30. Institutions are also expected to make the following information publicly available:⁶

- a. Information on institutional context, for example:
 - mission statement
 - sections of corporate plan
 - statement of quality assurance policies and processes

⁵ HEFCE 2009/31, 'Policy for addressing unsatisfactory quality in institutions', at www.hefce.ac.uk/pubs/hefce/2009/09_31/.

⁶ For HEIs this list of information was published in HEFCE 2006/45, 'Review of the Quality Assurance Framework: Phase two outcomes', Annex F. For HE delivered in FECs, a similar list can be found in Annex D of the IQER handbook, at: www.qaa.ac.uk/reviews/IQER/handbook08/default.asp#p14

- learning and teaching strategy.
- b. 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 (PSRBs)
 - arrangements for assessment and external examination procedures
 - results of internal student surveys.
- c. Information about links with employers.

Academic Infrastructure

31. The QAF is underpinned by the sector-owned, UK-wide Academic Infrastructure (AI), which provides a way of describing academic standards in UK higher education and the means by which these outcomes are achieved and demonstrated. The AI consists of:

- programme specifications – these include concise descriptions of the intended learning outcomes from a higher education programme, and how these outcomes can be achieved and demonstrated
- qualifications frameworks (one for England, Wales and Northern Ireland and one for Scotland) – these describe the generic levels of achievement represented by particular higher education qualifications
- subject benchmark statements – these set out expectations for standards of degrees in a range of subject areas. They 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
- the ‘Code of practice for the assurance of academic quality and standards in higher education’ – this provides guidance on maintaining quality and standards for universities and colleges subscribing to QAA (see www.qaa.ac.uk/academicinfrastructure/codeofpractice/).

Other QAA functions

Causes for Concern procedure

32. The Causes for Concern procedure enables organisations and individuals to ask QAA to investigate concerns relating to an institution’s policies or procedures (or lack of these) that are having a serious adverse effect on its academic standards and the quality of its higher education awards. If, having considered available evidence, QAA considers that the concern is justified, QAA officers will make a preliminary investigation at the institution. If this uncovers further evidence for concern, a full investigation can be made by a team of trained reviewers, which will result in a published report.⁷ The procedure

⁷ Full guidance on the Causes for Concern procedure can be found at: www.qaa.ac.uk/causesforconcern/default.asp

offers an opportunity for problems arising outside the normal audit or review cycle to be followed up, without the need to wait until the next formal engagement.

Advice on degree-awarding powers

33. Applications for taught degree-awarding powers, foundation degree-awarding powers, research degree-awarding powers or university title must be made to the Privy Council. QAA is responsible for scrutinising such applications according to government criteria and offering confidential guidance to the Privy Council accordingly. Applications are initially considered by a sub-committee of the QAA Board, the Advisory Committee on Degree Awarding Powers. If the application merits further examination, experienced and senior academic peers are engaged to scrutinise the organisation. The Advisory Committee and the QAA Board then consider the assessors' advice before making a recommendation to the Privy Council.

HE providers and their responsibilities for quality and standards

34. Higher education institutions are autonomous bodies. Those with degree-awarding powers, which are established through charters or statutes, are responsible for setting the standards of their own awards. They are expected to do this against sector-agreed subject and qualification benchmarks and by carrying out their own internal assessments and reviews of quality and standards. They maintain responsibility for their awards even if these are delivered elsewhere, for instance by university or college partners or overseas. The following sections provide more detail on how HEIs carry out these responsibilities. Further education colleges, as deliverers of HE, are responsible for working with their validating partners to ensure that the 'HE experience' in an FEC is of an equivalent quality to that in the awarding HEI.

Programme changes and approval

35. Institutions take a thorough, well-established and rigorous approach to their responsibilities for the quality and standards of the provision they offer. While the detail and terminology of arrangements vary to some extent, the pattern is very similar across English higher education as it rests on similar powers and approaches and fits within a national, and in many cases UK-wide, approach to supporting quality and standards. The Academic Infrastructure provides an overarching national architecture.

36. A new programme of study has to successfully complete a staged approval process by an institution with degree-awarding powers. Typically, this involves:

- a. Preparing documentation containing detailed information about a programme, such as learning outcomes, assessment methods, details of the core teaching team, library and technology resources, etc. Much of this information will be contained in a programme specification.
- b. Discussing the documentation at a series of committees or panels at departmental and institutional level, culminating in programme approval or

validation. Academic peers from the institution and from external organisations will take part in this process.

37. Programmes are normally reviewed or revalidated at intervals, typically around five years. This again involves panels of internal and external peers, and may additionally include the views of students and graduates. Major modifications to modules or complete programmes also undergo a committee/panel scrutiny approval process.

38. Once a programme is running it continues to be subject to an institution's internal quality assurance regime. Exact arrangements differ, but most include regular programme committees to discuss problems as they arise (these may include student representatives and/or receive suggestions from a student forum) and the provision of annual programme reports to an academic committee.

39. QAA audit checks that arrangements such as these are in place and operating in a satisfactory manner.

40. Institutions seek student feedback and evaluation of their academic experience. Various mechanisms are used, including questionnaire surveys (in addition to the NSS, which only involves final-year students) and course representative systems. Institutions and departments are increasingly aware of the need to keep students informed about actions taken as a result of student feedback. Processes such as these ensure that quality assurance measures feed through into quality enhancement.

41. Provision which is franchised or validated by another HEI is subject to processes that mirror those at the lead partner HEI.

External examining

42. External examiners are typically appointed for four years. Teaching programme committees/leaders make a nomination which has to be approved by a higher level committee on the basis of provided information, such as a CV, publication list and general reputation. A small, focused programme might have only one external examiner; broader or larger programmes typically have two, or a team of examiners assigned across years/modules.

43. The specific roles of external examiners vary across subjects and institutions, but typically include the following:⁸

- a. Approval of examination questions (external examiners can and do ask for changes).

⁸ Further information on the roles of external examiners can be found in QAA's 'Code of practice', Section 4:

www.qaa.ac.uk/academicinfrastructure/codeOfPractice/section4/default.asp

- b. Advice on continuous assessment or coursework.
- c. Moderation of assessment results, following an internal double-marking and/or moderation process, through sampling student assessment and/or examination scripts and by looking at the overall spread, breakdown and comparability of marks.

44. External examiners report their findings at an examination board, which consists of core/senior programme teachers and is chaired by a senior academic who is not part of that programme team. Examination boards are typically held every semester or year depending on institutional arrangements. This may result in marking modifications that affect results and/or adjustments to the teaching, learning and assessment of modules to reflect the comments of external examiners.

45. External examiners write a report for consideration at senior level in which they comment on standards, general matters relating to assessment (e.g. appropriateness of assessment formats) and, where appropriate, other aspects of teaching and learning or course content. The report may include actions that the programme team is required to take. Institutions have established internal processes, overseen at senior level, to ensure that these are taken forward. External examiners and chairs of examination boards expect an institution to act on recommendations before the next board meets.

Preparing for audit

46. Internally, institutions respond to and prepare for audit such that there is a cycle of enhancement. After they receive an audit report, extensive consideration is given to auditors' comments. Most audit judgements are positive, giving a judgement of confidence in processes to assure standards and quality. Particularly strong features are highlighted, as well as aspects that an institution may consider need enhancing. The latter are the subject of serious consideration, and most of them will be acted on and reported in the mid-cycle desk-based QAA review. They will certainly be the subject of scrutiny at the next audit visit. Preparations for audit begin several months in advance of the visit. This provides an opportunity for an internal 'health check' and includes drafting an institutional self-assessment document. The students' union also prepares its own document for consideration, in consultation with the institution. The audit process then proceeds as described elsewhere in this report.

PSRBs and accreditation

47. Many professional and vocational programmes are accredited by external professional, statutory or regulatory bodies. PSRBs are particularly concerned that standards, in terms of the syllabus taught and the outcomes that students achieve, meet expectations for professional membership and/or practice. Different PSRBs operate differently, but all have a policy of accreditation based on examination of documentary evidence and visits. The process frequently bears similarities to audit, but at individual

course level as opposed to across a whole institution. Most accreditation lasts for five years before renewal. It is a rigorous and extensive process.

48. Over half of higher education providers in the UK have at least some of their programmes subjected to accreditation by a PSRB. A survey of 55 institutions carried out by SQW Consulting found that 58 per cent of them had some kind of involvement with PSRBs.⁹ In some institutions the majority of students are registered on PSRB-accredited programmes, and these bodies play a significant role in defining standards at national level. PSRBs apply these standards, through periodic inspections and other engagements, across all relevant providers. Standards of awards remain the responsibility of individual institutions, which also determine their own curriculum, teaching and assessment strategies to deliver the learning outcomes, and standards agreed with PSRBs.

49. The QAFRG found that PSRB reviews, which are conducted at programme level, can provide several benefits, including valued professional recognition and a licence to practise, as well as further evidence of the good quality of programmes. However, they represent an additional burden.¹⁰

Responsibilities of other bodies

50. Other bodies may also have a role regarding quality and standards. The Office of the Independent Adjudicator for Higher Education (OIA), which is funded through sector subscriptions, operates an independent student complaints scheme, pursuant to the Higher Education Act 2004. If a complaint is investigated, higher education institutions are expected to comply with the formal decision of the OIA reviewer and any recommendations in full. Employers also have a number of roles in HE, including input into curriculum design, provision of work placements, or as purchasers of HE for in-house programmes. The Office for Standards in Education (Ofsted), the Training and Development Agency for Schools, and Strategic Health Authorities also have responsibilities for some provision.

The link between quality assurance and quality enhancement

51. At institutional and at national level, quality assurance and enhancement are linked. Higher education providers 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.

⁹ SQW Consulting, 2008, 'Assessing the impact of reviews of collaborative arrangements on higher education institutions', www.hefce.ac.uk/pubs/rdreports/2008/rd11_08/

¹⁰ Report of the Quality Assurance Framework Review Group, 2008, 'Phase three outcomes: assessment of the impacts of reviews of collaborative provision', HEFCE 2008/21, www.hefce.ac.uk/pubs/hefce/2008/08_21/

52. Nationally, QAA encourages enhancement, for example through its published audit and review reports, outcomes reports and reforms to the Academic Infrastructure.

53. The Higher Education Academy exists to support all providers of higher education in offering a high quality student learning experience. It 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, accrediting professional development provision in HE teaching, and supporting institutions participating in the flexible learning pathfinder scheme.

Context for the formation of the sub-committee

Concerns raised over quality and standards

54. In summer 2008, a number of concerns were raised in the media and elsewhere about perceived problems in the quality and standards of UK higher education provision. The areas of concern included:

- an increase in the proportion of first and upper second class degrees awarded
- the extent of plagiarism
- the recruitment of overseas students without the required standard of English
- poor assessment practices, including lack of appropriate feedback
- external examiners being unable to influence the assessment process
- contact time and learning hours.

55. While HEFCE was able to use the results from institutional audit as evidence that quality and standards overall in the sector were sound and robust, it was not always possible to find comprehensive evidence to refute or corroborate specific allegations. Institutional audits provide some information about these concerns. QAA's 'Outcomes from institutional audit' series provides summaries of findings from institutional audits by theme; titles include 'External examiners', 'Work-based learning' and 'Assessment of students'.¹¹ Audit is, however, selective by nature and is not designed to consider an entire institution's provision in detail. The cyclical nature of audit also means that problems might exist for some time before an external body can detect them, although internal processes may well have resolved the matter before any external scrutiny is applied.

56. There have also been questions over whether TQI provides the right information in the right format. The NSS has rapidly achieved a high profile and has had a positive impact on quality processes in institutions, and its results are demonstrably both valued and used by applicants (see later section on 'Public information'). The Unistats web-site

¹¹ All the QAA 'Outcomes from institutional audit' papers referred to in this report can be downloaded from www.qaa.ac.uk/reviews/institutionalAudit/outcomes/outcomes1.asp and Annex D of this report contains a list of all the outcomes reports available.

does not yet appear to have developed as much visibility among applicants as might be wished, although significant changes to the initial dataset and closer joining of the site to the UCAS applications process mean that this situation is improving. It is likely that more could be done to publicise the site and make the data more accessible to the key audience of potential students.

57. Although the sub-committee took these issues seriously, members also noted that the concerns and complaints outlined above, while receiving a large amount of publicity, were made by a very small fraction of students and staff. There are around 1.2 million students in England; in 2008, the Office of the Independent Adjudicator for Higher Education (which also covers Wales) received 900 complaints, of which 71 per cent were considered not justified.¹²

58. Despite this caution, the highly public nature of the concerns means that public confidence in HE may be seriously undermined, both at home and abroad. Potential students already use information produced by the media, such as league tables, to help them to make choices about where to study, and may well be influenced by negative coverage. International students comparing the UK with other countries as a possible study destination may also be influenced. The sub-committee considered that if concerns are not substantiated then it is important to promote a positive message to reassure these audiences that the quality of the HE they will experience is sound.

The future of institutional audit

59. The current six-year audit cycle comes to an end in 2011, and it is necessary for HEFCE, the sector and QAA to agree during academic year (AY) 2009-10 the key principles and processes that should underlie the method to apply from 2011-12. The IQER method comes to an end in 2012, and it is hoped that HE in FECs can be assessed using a method analogous to that used in HEIs as far as is possible. It is important that any new approach should be able to address quality concerns effectively and enable HEFCE to have confidence that it can discharge its statutory duty.

Innovation, Universities, Science and Skills Select Committee

60. The House of Commons' Innovation, Universities, Science and Skills Select Committee (IUSSC) launched a wide-ranging enquiry in October 2008 into students and universities. Questions on quality of teaching provision, admissions policies and degree classifications have formed part of this enquiry. These are issues which therefore have a high profile in government.

Formation and working of the TQSE sub-committee

61. The concerns over the quality of higher education outlined above potentially mean that HEFCE's effectiveness in fulfilling its statutory function could be called into question. In the autumn of 2008, the TQSE committee and HEFCE Board therefore formed a sub-committee specifically to investigate the concerns in more detail and, in light of its findings, to advise HEFCE on the fulfilment of its statutory function. The terms of

¹² OIA, 'Annual report 2008', www.oiahe.org.uk/docs/OIAHE-Annual-Report-2008.pdf

reference and membership of the committee are at Annex B. The committee met four times between November 2008 and June 2009.

62. The sub-committee heard perspectives on the current quality assurance context from HEFCE, UUK/GuildHE, the Higher Education Academy and the National Union of Students. It also received information and ideas from QAA on a range of possible approaches to redeveloping institutional audit.

63. In agreeing its approach to the concerns raised, the sub-committee considered evidence from existing reports and data analysis. It also drew heavily on a HEFCE-funded report¹³ on QAA enquiries carried out under the following themes:

- student workload and contact hours
- language requirements for the acceptance of international students
- recruitment and admission practices for international students
- use of external examiners
- assessment practices.

QAA's enquiries also took note of submissions to the IUSSSC enquiry.

64. The evidence and recommendations in QAA's thematic enquiries report were extensively considered by the sub-committee and have thus fed into its judgements and recommendations.

65. Although every effort was made to obtain and consider appropriate evidence, the sub-committee was aware of the very large body of work in the area of quality assurance and it was not possible to carry out exhaustive research in the short timescale available. HEFCE officers would be pleased to consider other work which is brought to their attention as part of ongoing discussions about the future of the Quality Assurance Framework.

66. In this report, the sub-committee sets out its findings and conclusions from consideration of the available evidence, and makes recommendations to HEFCE on how the Council might best fulfil its statutory duty in the future in light of these findings. In making recommendations for future action, the sub-committee has been at pains to recommend only solutions it considers to be feasible, to indicate who would be the most appropriate group to carry out actions, and to make recommendations commensurate with the size of any shortcomings it has identified.

Areas of concern

67. The following sections set out areas the sub-committee identified as being of potential concern to HEFCE regarding its ability to fulfil its statutory duty. For each, the sub-committee has, where appropriate, offered a judgement on:

- whether or not the concern is substantiated

¹³ QAA, 2009, 'Thematic enquiries into concerns about academic quality and standards in higher education in England – final report', www.qaa.ac.uk/standardsandquality/thematicenquiries/FinalReportApril09.pdf

- whether it poses a risk to public confidence
- whether it poses a risk to HEFCE's fulfilment of its statutory duty.

Following on from these judgements, the sub-committee has sought to make one or more recommendations for action, as appropriate.

Relationships between quality and standards

68. Recent debates have focused not just on what students experience while in HE, but also on the standards they reach on completing their qualification. Within the HE sector this distinction is explained in the difference between 'academic quality' and 'academic standards', which are regarded as related but essentially different and distinct. The following definitions from QAA¹⁴ are widely used in the sector:

Academic quality is a way of describing how well the learning opportunities available to students are managed to help them to achieve their award. It is about making sure that appropriate and effective teaching, support, assessment and learning opportunities are provided for them.

The words 'academic standards' are used to describe the level of achievement that a student has to reach to gain an academic award (e.g. a degree). For similar awards, the threshold level of achievement should be the same across the UK.

69. The 1992 Act does not define the terms 'quality' and 'standards', but uses them as if there is some difference between them. While there is no strict legal definition of these terms, we understand that a court of law in attempting to define them would be likely to recognise 'quality' and 'standards' as technical terms with a specific meaning to a particular technical community, and that this would be considered alongside the meanings of the terms as accepted by the majority of the HE community at large.

70. The sub-committee therefore accepts QAA's technical definitions as accurate for the process of quality assurance, but would caution that to a non-specialist (many of whom, like students, employers and parents, could reasonably be considered as being within the HE community) 'quality' and 'standards' may well be indistinguishable, or that usage of the term is likely to vary. Public understanding of where responsibilities lie is not likely to be as extensive as that of a specialist. QAA's thematic enquiries report notes that: 'among the general public and media commentators there does not appear to be a common understanding of what the terms "academic standards" or "academic quality" mean' (p.4).

71. The sub-committee believes that many observers and users of HE may have a broad conception of quality that relates to the whole student experience, including the effectiveness of the teaching but also non-academic aspects such as the institution's facilities. That conception is less likely to include the management of learning opportunities and many other matters specifically referred to in institutional audit. While the sector may need the audit process to reach judgements on quality as defined by QAA (above), it should not expect non-specialists to become familiar with the detail of

¹⁴ www.qaa.ac.uk/students/faqs.asp#Q24

technical definitions. Rather, the public needs clear, non-technical information about the areas for which the various bodies involved (institutions, HEFCE and QAA) are responsible.

72. The Council receives a certain amount of information on standards from QAA, via institutional audit reports and QAA's annual report to HEFCE. HEFCE can also use the Causes for Concern process to raise a concern about standards as well as quality.

73. It is important to be clear, however, that HEIs, as autonomous bodies with the power to award degrees, must be responsible for the standards of their awards, within the context of sector-agreed subject and qualification benchmarks. Since HEFCE cannot directly guarantee the standards of the many and diverse awards available, it must rely on institutions to manage their own standards and on assessment of how well they do this.

74. The range of institutions, diversity of missions and variety of modes of learning and awards available in HE mean that comparability of standards is difficult. Despite this, a national threshold standard is reached by reference to the Academic Infrastructure, three components of which (the HE qualification framework, subject benchmark statements and programme specifications) are concerned with providing clear reference points for standards in institutions. The consideration of an institution's management of standards in institutional audit includes its use of the AI.

75. The sub-committee considers that there may be scope to strengthen this aspect of audit, to support the demonstration of appropriate standards in HE, and returns to this topic later in the report (paragraphs 131-146). It is important to remember that the Academic Infrastructure has a UK-wide application, and so other countries would reasonably expect to be involved in any discussions about changes to it. However, the sub-committee does not propose changes directly to the AI, but only to the way in which parts of it are used in audit. HEFCE will need to take these issues forward jointly with QAA and the sector.

76. Even though institutions are responsible for their own standards, the public are likely to hold HEFCE to account if quality or standards in HE were found to be poor or failing to any considerable extent. The quality assurance method would also come under public scrutiny if it failed to detect serious problems quickly. As HEFCE allocates public funding to institutions and to QAA, in these circumstances it could expect the media and public to ask questions about how appropriately it was spending public funds and how it proposed to improve its effectiveness in the future.

77. Given these issues and the need to maintain public and government confidence, the sub-committee believes that, in addition to HEFCE's statutory responsibility for providing quality assessment, it also has a strong interest in ensuring that standards are set appropriately.

78. The sub-committee considers that while HEIs have the right and duty to maintain their own standards, HEFCE has a legitimate interest in ensuring that this is taking place. To provide assurances to government on the efficient and effective use of public funding, and to fulfil its requirements under the Act, HEFCE needs to know that:

- a. Systems are in place to set standards appropriately, and that these sector-specified standards are being met.
- b. Institutions' systems for the management of standards are robust and effective.
- c. Procedures for addressing problems are robust and effective in each institution.

79. The sub-committee is confident that the first of these points is by and large the case, thanks to the evidence provided from external examiners' reports and subject benchmarking. However, such evidence is generally contained within institutions and so is not readily available. In any case, it is of such a technical nature that it would not be accessible to the general public. It should also be borne in mind that external examiners' experiences are necessarily limited to the institutions in which they have worked as academics or examiners, and hence they can offer only a limited comment on comparability at national level (PSRBs which offer accreditation may be able to do more in this regard). Therefore, it is difficult to readily identify convincing evidence of the first point in a format that can be publicly presented, and which would provide an easy means to refute allegations of poor performance in a way that maintains public confidence. The sub-committee saw no evidence of systematic failure for points b. and c., although there are aspects that need improvement. Later in the report, recommendations are made for strengthening the external examiner system and making improvements to the systems and procedures referred to under b. and c.

Sub-committee's judgement on quality and standards

Public confidence: There is a risk that public confidence in quality assurance may be undermined if the terms in which it is discussed cannot be understood.

HEFCE's statutory duty: Clarification of responsibilities will help HEFCE to maintain its role and explain it to others. While standard setting must be the responsibility of institutions – and the collective responsibility of the sector – HEFCE has a legitimate interest in knowing that standards are appropriate and are being maintained.

Recommendation:

R1. The sub-committee considers that the distinct definitions of 'quality' and 'standards' are both helpful and necessary, but an explanation of how the two relate to each other and who is responsible for what should be prepared in a format more appropriate for public use. This should be widely publicised. HEFCE, QAA, the NUS and representative bodies should agree a draft and an appropriate communications

strategy. Any published guidance needs to be brief and in language that is clear and accessible.

Admissions procedures

80. Some media articles have suggested that admissions standards are falling, as pressure to increase numbers means that students are being admitted who are perhaps not capable of, or not well prepared for, studying at a higher level. Information from HEFCE suggests that average 'traditional' entry qualifications have increased in recent years, although this gives rise to further debates around perceived grade inflation in the schools sector.

81. Alongside this, there are suggestions that international students are being admitted without suitable qualifications, particularly in English, for the sake of the additional funds they bring. QAA considered this specific issue as part of its thematic enquiries. Those interviewed considered recruitment of international students to be a positive feature of higher education – although they were also candid about the fact that they represent 'a significant financial input for many institutions'. The QAA report, which concentrates on international admissions, notes that a 2007 survey by the UK Council for International Student Affairs found that 41 institutions had admitted students onto programmes with less than the minimum stated language requirements. The sub-committee cautions, however, that admissions decisions for any student – whether home or international – are made on a case-by-case basis. Admissions tutors make judgements on an individual's potential to succeed, taking previous qualifications and experience into account. This aspect of institutional autonomy should not be compromised.

82. International students, particularly those for whom English is not their first language, often need more support than home students both before admission and during their studies. The QAA report suggests that there is variability in the availability and/or effectiveness of English language and other support mechanisms for international students. Focus group participants also noted that 'where issues relating to cultural differences to academic study and language ability arise, they affect not only the learning opportunities of international students but also those of 'home' students'.

83. The section of the QAA 'Code of practice' relating to admissions rightly states that the policies and procedures which institutions use to attract, recruit, select, admit and enrol students should be clear, fair, explicit and consistently applied. No systemic general failing in admissions procedures has been identified through QAA institutional audit, and the sub-committee has confidence in this assessment. Admissions processes often operate at departmental level, however, and systematic consideration at this level would be cumbersome. The sub-committee believes that as institutions' reputations at home and abroad depend on maintaining high standards, they are likely to be making every effort to maintain their standards.

84. Despite this confidence, the sub-committee believes that there is a real risk of damaging public confidence in higher education if admissions practices are believed to be anything less than robust. Better explanations of how admissions practices operate should be provided for the public and potential students.

85. International students in particular would benefit from further guidance both on admissions procedures and on the support they can expect to receive during their studies, so that they know what questions to ask of their institution. Institutions themselves might also benefit from disseminating good practice in this regard. The sub-committee notes and commends a project recently commissioned by the UK Council for International Student Affairs and the Higher Education Academy, which seeks to establish a national resource centre for teaching and learning for international students (TALIS). One aim of the TALIS project is to identify and disseminate information and guidance on teaching and learning for international students, with the intention of strengthening the UK international student experience. This will be a valuable contribution to this information gap.

86. As part of its widening participation strategy, HEFCE has been working with the Office for Fair Access to ask HEIs for a strategic assessment of their widening participation achievements, which should include a high-level statement on admissions policy showing how the institution will ensure transparency, consistency and fairness through its own internal procedures.¹⁵ The documents were submitted to HEFCE by the end of June 2009. The expectation is that these should be published when fully developed; they will provide valuable information about admissions procedures in the sector.

87. The sub-committee acknowledges and welcomes the work done by the Supporting Professionalism in Admissions (SPA) service, which is gathering and disseminating good practice in admissions and supporting institutions in developing fair admissions practices. Its work includes highlighting the importance of transparent, published admissions policies and procedures. At the time of preparing this report, SPA was drafting a good practice statement for admissions policies.¹⁶ The current draft states that: 'all policies must be transparent, easy to find and understand, both on the web-site and referred to or outlined in relevant printed materials'. It also offers excellent advice on transparency of language and ease of access on institutional web-sites (section 4.3 of the draft statement). The sub-committee fully endorses the statement and would encourage all institutions to engage with and benefit from the work of the SPA service.

Sub-committee's judgement on admissions procedures

Is there substance to the allegations? The sub-committee found no evidence of systemic failure in admissions procedures. Its members are aware of the potential for anecdote to feed media allegations of falling admissions standards in the context of financial and commercial pressures, but consider that the procedures presently in place, along with the institutional imperative to protect reputation, are more than sufficient to ensure that appropriate admissions standards are upheld.

Public confidence: Despite the above, the incidence of negative public perception of this area needs to be addressed.

¹⁵ HEFCE 2009/01, 'Request for widening participation strategic assessments', www.hefce.ac.uk/pubs/hefce/2009/09_01/

¹⁶ For the latest draft see: www.spa.ac.uk/good-practice/admissions-policies.html

HEFCE's statutory duty: The sub-committee considers that, overall, there is sufficient evidence to be confident that admissions procedures, including those for international students, are sound and do not currently present a threat to the fulfilment of HEFCE's statutory duty.

Recommendation:

R2. Each institution should develop a statement about the support arrangements that international students can expect from the institution, both in making the transition to the UK and in their continuing studies. This should include support in the English language and for personal and academic issues as appropriate. Clearer guidance should be provided to international students and their advisers about higher education teaching, learning and assessment practices in England.

Degree classifications

88. There has been much discussion in recent years, both in the public media and within the sector, about whether the increasing proportion of students graduating with upper second and, particularly, first class degrees reflects 'grade inflation' rather than improving standards.

89. This is an area of considerable debate, where statistical evidence is used to support conflicting views. The TQSE sub-committee considered data provided from HEFCE's Analytical Services Group, which confirmed that the proportion of firsts and upper seconds has increased from 42.5 per cent for UK students starting in 1996-97 to 46.4 per cent for 2002-03 starters. This is not necessarily evidence of 'grade inflation'; increases may be just as attributable to the similar trends in grade increase in entry level qualifications, which are strongly linked to final degree outcome, or to greater 'value added'. In short, it is very difficult to be entirely sure of the reasons for the increased achievement level and the sub-committee is not minded to draw simplistic conclusions from an increase in first and upper second class degrees.

90. The Measuring and Recording Student Achievement Group chaired by Professor Bob Burgess (the Burgess Group) undertook substantial work on this issue between 2003 and 2007.¹⁷ The Burgess Group had concerns regarding the equivalence of similar degree classes for the same subject at different institutions, and among different subjects within an institution. It recognised a need for greater stability in outcome measures, but in a diverse sector where institutions determine their own awards, noted that exploring this further would require considerable work.

¹⁷ Burgess Group, 2004, 'Measuring and recording student achievement', and 2007, 'Beyond the honours degree classification: the Burgess Group final report', both available from UUK: www.UniversitiesUK.ac.uk

91. The Burgess Group concluded that:
- a. While standards of degrees are satisfactory, the existing degree classification system has outlived its usefulness and is no longer fit for purpose. It provides a summative judgement that does not reflect the student's full achievement during their study, and is no longer suitable within the context of lifelong learning.
 - b. There is an inappropriate focus on firsts and upper seconds, when lower degree classifications also represent an achievement.
 - c. The sector should identify and agree an effective system of representing and communicating student achievement. The group recommended a Higher Education Achievement Report (HEAR), which would build on the existing academic transcript and reflect the components involved in achieving a degree. While the existing classifications will be retained for the present time, the group hoped that they might be replaced with another form of summative judgement or (ideally) that the need for an overall judgement might disappear.
92. The Burgess Implementation Steering Group is currently managing a trial of the HEAR in 18 HEIs.¹⁸ The HEAR describes achievement and does not deliver a single overall summative judgement, although it also records the traditional degree classification. The sub-committee believes that the work this group has undertaken has outlined relevant issues in this area, and endorses the approach being taken.
93. The QAA thematic enquiries report comments on degree classifications as part of assessment. QAA audits contain several recommendations on arrangements for the classification of honours degrees, and interviews for the enquiry confirmed the Burgess Group's findings that the classification system is not fit for purpose.
94. The Burgess Group continues to work on developing public guidance as to how and why approaches to degree classifications vary. The sub-committee welcomes this work, which will be an important step in informing public perception in this regard.

Sub-committee's judgement on degree classifications

Is there substance to the allegations? The degree classification system (but not the standards of degrees themselves) is an area of difficulty. The sub-committee regards the HEAR as an appropriate change to begin to address this issue, although it will not solve all problems around comparability. The sector has recognised this and is taking the HEAR forward.

Public confidence: There is a risk to public confidence, mitigated by the work of the Burgess Group.

¹⁸ UUK media release, 21 October 2008, 'Institutions pilot new student achievement report', www.universitiesuk.ac.uk/Newsroom/Media-Releases/Pages/HEARtrial.aspx

HEFCE's statutory duty: The sub-committee considers that there is no issue regarding HEFCE's statutory responsibility.

Recommendation:

R3. The sector should continue to take forward as rapidly as is prudent the recommendations of the Burgess Group. HEFCE should consider what further support might be made available to institutions in introducing the HEAR and disseminating information to students, employers and an international audience about its purpose.

Plagiarism

95. Reports in the media and from individual institutions suggest that plagiarism is on the increase among students across the HE sector. Several reasons are suggested for the rise of plagiarism, including:

- the availability of information on the internet
- more coursework, group work and continuous assessment, as opposed to closed examinations
- increased class sizes, leading to tutors' unfamiliarity with student work
- lack of student awareness about what plagiarism is, including cultural differences
- better detection software leading to more plagiarism instances being recorded.

The term 'plagiarism' encompasses a wide variety of deficiencies, ranging from poor referencing to the purchase of 'ghost written' essays, which makes it more difficult to identify definite trends. Plagiarism of certain types is now easier to commit, but also easier to detect.

96. A report published in May 2008 by the Academic Misconduct Benchmarking Research Project (AMBeR)¹⁹ considered survey responses from 100 HEIs and found that in one academic year, 0.72 per cent of students (i.e. 7.2 cases for every 1,000 students) had been found to have plagiarised work, which it notes is a low incidence compared with other sources, such as surveys of students themselves. However, there does not appear to be any national research into plagiarism statistics over time, so the sub-committee finds it difficult to draw evidenced conclusions about whether the problem is worsening, or what this might mean given the points above.

97. While plagiarism must of course be a concern regarding academic quality and standards, the sub-committee is aware that institutions are working hard to identify and address plagiarism. Actions to tackle plagiarism start with an institution's learning, teaching and assessment strategy. Much effort in institutions is devoted to 'designing plagiarism out' of programmes. More specific actions can include the use of plagiarism

¹⁹ Tennant P and Duggan F, 2008, 'The recorded incidence of student plagiarism and the penalties applied', AMBeR project, Higher Education Academy and Joint Information Systems Committee (JISC), www.heacademy.ac.uk/assets/York/documents/AMBeR_PartII_Full_Report.pdf

detection software such as Turnitin, clearer guidance to students on good academic practice, and the development and implementation of a strong anti-plagiarism policy across an institution. Institutions also employ a wide range of sanctions to deal with offenders, including informal warnings, zero-marking a module, requiring students to retake modules, restricting marks for retaken modules, dropping a degree class or, in extreme cases, expulsion from a course and/or institution. Penalties tend to be more severe in the later years of a degree.

98. The section of the QAA 'Code of practice' relating to assessment recommends that students should be provided with information and guidance about plagiarism, and institutional audit will consider whether guidance is clear and appropriate. Audit outcomes confirm that institutions have clear policies in place to deal with plagiarism, and teaching staff are made aware of these. The Academy JISC Academic Integrity Service (AJAIS) plays a valuable part in helping institutions to do this and in disseminating good practice. AJAIS considers pedagogical and management responses needed to address academic misconduct and embed academic integrity.²⁰ Plagiarism resources pertinent to particular subjects are also available from Higher Education Academy Subject Centres.

99. QAA has not been asked to make any formal assessment of institutions' approaches to detecting and addressing plagiarism, but there may be scope to look further at this area in the revision of the audit method.

100. The public perception of plagiarism in higher education appears to remain negative, as evidenced by the attention it has received in the IUSSSC enquiry. It would be beneficial to publicise institutions' methods for detecting and addressing plagiarism more widely, to reassure the wider public that this issue is taken very seriously. To support public confidence, the sector cannot be, or be seen to be, complacent.

Sub-committee's judgement on plagiarism

Is there substance to the allegations? There will always be instances of plagiarism, but institutions take the issue very seriously and are continuing to develop ways to detect and address it.

Public confidence: Negative public perception is a serious concern.

HEFCE's statutory duty: The sub-committee considers that there is sufficient evidence to be confident that plagiarism does not currently present a threat to the fulfilment of HEFCE's statutory duty.

Recommendation:

R4. The sub-committee recommends that to support public confidence, institutions continue to enforce their policies in a consistent manner. They should ensure that staff and students are aware of the professional advice available nationally, such as that provided by the Higher Education Academy. Institutions should also help

²⁰ See: www.heacademy.ac.uk/ourwork/learning/collaboration/academic_integrity

the public to understand what they do by publicising their policies in an accessible format.

External examiners

101. The external examiner system is held up as a safeguard against inconsistent standards and as a means of ensuring good practice in assessment. It is therefore an area of legitimate interest for HEFCE. The role of the external examiner was explained in more detail in paragraphs 42-45 of this report.

102. The institutional audit method explicitly considers the strong and scrupulous use of independent external examiners. The sub-committee notes in particular that QAA's 'Outcomes from institutional audit' report on external examiners, considering 59 institutional audit reports published between December 2004 and August 2006, concluded that: 'overwhelmingly, the evidence of the audit reports indicates that institutions' external examining arrangements were working satisfactorily'. The 2008 report states that, in most cases, external examination procedures were 'making a significant contribution to institutions' work to safeguard the academic standards of awards'.

103. The diversification and growth of English HE means that the role of the external examiner has changed. While multiple pathways and modules have increased the complexity of many programmes, institutions have responded by using teams of examiners and adhering to the QAA 'Code of practice' section on external examining. The external examiner system also forms part of the Higher Education Academy's enhancement work, which has raised questions over whether improved induction and support systems are needed for external examiners.²¹ The sub-committee considered whether external examiners, and the system as a whole, are sufficiently well resourced; it can be expensive for an institution in terms of paying travel and subsistence costs, but fees do not adequately recompense examiners for the work involved. It is incumbent on HEIs to use their teaching funding efficiently and effectively according to their strategic direction, but the external examiner system should be a priority.

104. The QAA thematic enquiry report notes that in the media, 'matters to do with the role and work of external examiners are not well understood', with some sources being under the impression that there is a nationally regulated body and criteria for awards. Among students in the focus groups, awareness and understanding of the functions of external examiners appeared to be low.

105. Some allegations of abuse of the external examiner system have been made in the national press. These suggest that examiners are being put under pressure to pass unsatisfactory students or to rescind comments made in their reports. The sub-committee considers that it would be valuable to provide external examiners with an independent recourse to which they could apply if they were unhappy with how an institution received their work. This should not be regarded as an opportunity for 'whistle-blowing'; rather, it should be a recognised part of the system to which examiners can refer if other routes have been exhausted.

²¹ See: www.heacademy.ac.uk/ourwork/institutions/externalexaminers

106. Respondents to the QAA thematic enquiry indicated that the external examiner system is respected and valued; they did not report widespread concerns or dissatisfaction with current practice. Views as to the role and purpose of external examiners varied. Ensuring comparability of standards was one view, but others considered that external examiners ensure fairness in assessment arrangements or offer an external view on planned provision. Some interviewees suggested that the selection and appointment of examiners by institutions is not always transparent.

107. The sub-committee believes that HEFCE has a legitimate interest in knowing that the external examiner system is sufficiently robust to inspire confidence in the level of scrutiny it provides. While existing institutional audit arrangements consider how an HEI makes use of its external examiners, there may be scope to link more specifically and robustly to examiners' findings in that institution, for example in comparability of standards or robustness of assessment procedures. The sub-committee considers that it would be valuable for an audit panel to speak directly with a sample of external examiners. While the sub-committee accepts the evidence from audit reports that the system is working satisfactorily, it does not consider that the current situation of challenge can be left unexamined.

108. In common with other agencies, the sub-committee specifically rejects calls for a nationally regulated system of external examining, as it believes that this would be contrary to institutional autonomy, drive diversity out of the system, present an unbearable cost, and risk the current basis of academic service on which the system depends.

Sub-committee's judgement on the external examiner system

Is there substance to the allegations? The system is under strain, and some substantive areas would benefit from support and improvement.

Public confidence: Negative public perception is a serious concern. There is a need to educate the wider public about the role of the external examiner system and what it can and cannot do.

HEFCE's statutory duty: The sub-committee considers that there is sufficient evidence to be confident that the external examiner system is robust enough to enable HEFCE to fulfil its statutory duty at present. It is not certain, however, that this will continue unless changes are made to the system.

Recommendation:

R5. The sub-committee considers that a full review of the external examiner system is needed, and that it is particularly important to consider the following:

- a. Provision of sufficient confidence to all relevant stakeholders, including HEFCE, that standards of awards are at an appropriate level and comparable across the sector. External examiners' role in this regard should be clarified and communicated to a wider audience.

- b. Provision of an independent recourse by which external examiners feel able to raise issues or concerns when routes within institutions' own processes are exhausted (this is of critical importance to public confidence).
- c. Whether the system is sufficiently well supported by institutions to function effectively.
- d. Whether the system is appropriate to changing practice.
- e. Whether external examining is sufficiently well recognised in promotion procedures.
- f. General terms of reference for the external examiner role, including a job description, should be agreed across the sector. This will help to ensure consistency and comparability, and make it easier to explain to the public at large exactly what role external examiners play in assuring standards. It may be most appropriate for QAA to include this in the relevant section of its 'Code of practice'.
- g. The sub-committee specifically recommends that at audit a representative sample of external examiners is interviewed by the panel.

109. The sub-committee acknowledges that addressing these issues will require a considerable amount of work over an extended period. This will require engagement from a wide range of sector organisations and institutions themselves. Given that the system is UK-wide, UUK and GuildHE may wish to consider taking forward some aspects of this recommendation, especially point b. Further discussion would be needed as to the organisations, parameters and timescales involved.

Assessment and feedback

110. The area of assessment and feedback consistently receives lower NSS scores than other learning and teaching elements. In the 2009 NSS, the overall satisfaction rate was 82 per cent, whereas 65 per cent of respondents were satisfied with assessment and feedback.²² A high quality HE system depends on its assessment practices being transparent and robust. However, there is a perception in the media that the need to perform well in 'league tables' puts institutions under pressure to pass students who might not in fact meet the required standard. There is also anecdotal evidence that some students paying high levels of fees have an expectation that they 'should' receive a good degree.

²² See www.hefce.ac.uk/news/hefce/2009/nss.htm for the results; 65 per cent is an improvement on the 2008 score of 64 per cent. This could indicate that interventions and attempts to improve practice in this area are beginning to have an effect.

111. The QAA's thematic enquiries report comments that: 'Academic audit reports have consistently attached more recommendations for action to institutional assessment arrangements than almost any other area scrutinised by audit teams.' Perspectives on assessment practices varied, but the report identifies the following concerns:

- incompatibility of assessment practices in different subjects, which causes difficulties for multi-disciplinary courses
- variations in assessment practices among institutions and disciplines, and the reasons for these, which are not widely understood
- allegations, supported by some responses from academic staff, that some institutions encourage staff to adopt more lenient grading schemes, to improve institutional standing in league tables.

112. Senates and assessment boards have a significant role in maintaining standards. While QAA's 'Outcomes from institutional audit' report on the assessment of students (June 2008) notes that most assessment boards perform well, it also expresses concerns that some of them lack guidelines for exercising discretion in determining awards. Other concerns refer to inconsistencies in assessment arrangements, although this is reported to be improving.

113. Regarding feedback in particular, a 2008 NUS report²³ shows similar results, noting that 85 per cent of students rated the quality of their teaching and learning experience as 'good or excellent', but only 25 per cent reported receiving individual oral feedback on their assessments compared with 71 per cent who would want it. The time taken to receive feedback varied; 25 per cent of students had to wait more than five weeks for feedback on their coursework. Feedback also varied greatly in its content and helpfulness. QAA's 'Outcomes from institutional audit' report on student assessment comments on variations in feedback practice and difficulties in adhering to guidelines.

114. This suggests that while students are generally satisfied with the teaching they receive, they identify the receipt of formative feedback as a weak area. There is a need to ensure that institutions address this. Remedies may include:

- professional development for staff
- outlining clearly for students the type and amount of feedback they may expect
- clarifying for students what constitutes feedback, so they can identify when it is given
- institutions recognising that providing student feedback takes time and resources
- selective and appropriate use of technology
- recognising that there will be variation among subjects as to what is expected and appropriate.

115. A 2008 report by the Financial Sustainability Strategy Group (FSSG)²⁴ identifies student assessment as an area that is particularly under pressure in terms of resources.

²³ National Union of Students, 2008, 'NUS student experience report', available from: www.nus.org.uk

²⁴ Financial Sustainability Strategy Group, 2008, 'The sustainability of learning and teaching in English higher education', www.hefce.ac.uk/finance/fundinghe/trac/fssg/FSSGreport.pdf

Greater diversity in programmes and in the student body has led to an increase in the complexity and volume of assessment, although the report notes that assessment has become more rigorous and professional since 1990. The report suggests that one response could be to take a more differentiated approach to assessment, for example by using more formative methods. The sub-committee is aware that many institutions are already working hard to review and adapt their assessment processes. The FSSG report comments that: 'reaching a better balance of assessment, without loss of value or quality of UK HE is one of the major challenges facing the sector in achieving a more sustainable teaching and learning experience'.

116. The sub-committee recognises that individualised assessment and feedback will be challenging in a continually changing, mass higher education system. However, there is evidence that institutions are active in enhancing their assessment practices and procedures, in some cases in response to NSS results, and in educating students about their approaches. There is scope to do more to support institutions in this work; the Higher Education Academy, with the significant body of work it has already undertaken in this area, is ideally placed to do so. Individual institutions, departments and staff will, however, need to take ultimate responsibility for implementation.

Sub-committee's judgement on assessment and feedback

Is there substance to the allegations? Evidence from QAA and the NSS suggests that assessment and feedback are challenging areas for the sector. The sub-committee does not consider that there is evidence of a systemic failure in the sector, but institutions should not be complacent and need to work continually to ensure that practices are consistent and robust.

Public confidence: There is a risk to public confidence if accusations of 'dumbing down' continue to be made.

HEFCE's statutory duty: The sub-committee considers that there is sufficient evidence for HEFCE to be confident that existing assessment practices are robust enough to enable it to fulfil its statutory duty.

Recommendations:

R6. Institutions should ensure that assessment methods and criteria are easy to interpret and widely available through public media such as web-sites, course prospectuses and student handbooks.

R7. Institutions should continue to review and improve their processes for offering formative feedback to students and aim to ensure that it is useful, timely and appropriate.

Contact time and learning hours

117. A number of recent research reports have found that UK students spend less time studying than their European counterparts, and that UK degrees are shorter in length

overall.²⁵ The studies have given rise to a good deal of debate in the sector and there are still conflicting views as to their conclusions. It is clear that direct contact hours and the effort required from students in their own time vary hugely by subject area and among institutions. Different studies have measured these in different ways, and the distinction between contact and study hours is not always made. Most of the research concentrates on 'traditional' young, full-time students, and it is important to bear in mind that part-time and mature students have a further variety of experience.

118. The work undertaken by CHERI suggests that the relationship between time-on-task and the quality of learning is not a simple one; the situation is rather more complex. Although there is evidence of a relationship between time spent on studies and a successful learning outcome, the relationship is not particularly strong. The study also found that differences in experiences do not necessarily mean that one is 'better' than another. The NUS survey of student experience notes that, while students may prefer certain types of teaching over others (e.g. interactive methods rather than traditional lectures), the majority (75 per cent) believe that the amount of contact time they receive is sufficient.

119. The CHERI study found that ERASMUS students were rather more likely to report the requirements at UK institutions as 'less demanding' than those of their home institutions, although they also perceived the teaching and student support as being of high quality.

120. The chief executive of the Higher Education Academy, in his submission to John Denham's debate on the future of higher education, commented that: 'there should be a clear national statement to the effect that there is no evidence to support a causal relationship between the number of class contact hours and student learning outcomes'.²⁶

121. The Financial Sustainability Strategy Group report comments that contact hours are an important factor in considering the sustainability of the student-staff ratio in HEIs.²⁷ Reduced contact hours can attract adverse comment from students. One response is to teach in increased group sizes, which may affect the nature (and hence perhaps quality) of the contact.

122. The sub-committee has borne in mind that higher education in England has a particular approach to learning and teaching, which emphasises a learning culture based

²⁵ These reports include: Bekhradnia B and Sastry T on behalf of the Higher Education Policy Institute, 2007, 'The academic experience of students in English universities' (www.hepi.ac.uk/pubdetail.asp?ID=240&DOC=1); Brennan J, Patel K, Tang W on behalf of the Centre for Higher Education Research and Information (CHERI), April 2009, 'Diversity in the student learning experience and time devoted to study: a comparative analysis of the UK and European evidence – a report to HEFCE' (funded by HEFCE) (www.hefce.ac.uk/pubs/rdreports/2009/rd06_09/); National Union of Students, 2008, 'NUS student experience report', available from: www.nus.org.uk

²⁶ Ramsden P, 2008, 'The future of higher education: teaching and the student experience', www.dius.gov.uk/higher_education/shape_and_structure/he_debate/teaching_and_student_experience.aspx

²⁷ See footnote 24.

on a partnership between learner and teacher input. The CHERI report found evidence to suggest that UK students are more likely than others to undertake additional work beyond that required by their institutions.

123. The UK's approach to the Bologna process has always been that the learning outcome rather than time input should be the key measurement, although this may not be generally known or understood outside the sector. PSRBs have also progressively moved away from stating requirements for learning time to emphasising learning outcomes and recognising diversity in curricula leading to their attainment.

124. The CHERI report found other differences in student experiences between higher education in the UK and elsewhere. Compared with other countries, for example, UK HE demonstrates a relatively low emphasis on group work and a lower frequency of work placements, but greater emphasis on learner autonomy. These aggregate conclusions mask differences among institutions and subjects, and the sub-committee notes that HE in FECs has not been considered in the various studies.

125. QAA's thematic enquiries on contact hours did not find any evidence from institutional audit reports that students had expressed concern about the level of tuition and academic support they received. However, the enquiry found that there can be confusion about the nature of 'contact time' – for example, does it include e-mail contact or laboratory hours? Consideration of comments on student blogs, mostly by arts and humanities students, found that while some students are content with the concept of self-directed learning, others consider that limited contact hours represent poor value for money, and it is this perception that may underpin many of the current debates. Enquiry interviewees reported that: 'institutions could do more to explain the academic culture to applicants and could work with students to clarify expectations'. All focus group discussion participants considered that differences in modes of delivery across disciplines might not be clearly understood by those outside higher education.

126. The QAA report mentions suggestions from submissions to the IUSSSC that where students receive a higher level of contact hours, particularly one-to-one support, those with poorer qualifications on admission achieve a better outcome from their higher education experience. The sub-committee considers that students should have access to support from academic staff, alongside support from others involved in the teaching and learning process.

127. The sub-committee is clear that a wide diversity of teaching and learning styles and approaches is both desirable and necessary to meet the needs of an exceptionally diverse student body with diverse learning needs. In particular, the sub-committee believes that quantity of teaching time does not necessarily equate with the quality of either the teaching or learning associated with it.

128. The sector should not, however, be complacent about this issue. There is currently a lack of evidence-based understanding of the relationships between contact time, student effort and the outcomes achieved. The decision about where and what to study is a major decision in a student's life, and it is important that students have every opportunity to choose the experience that will be right for them. What students can expect from their time in higher education is a vital part of the information required in that

decision-making process. Students, especially those without experience of higher education in their families, need help to make the transition from school to higher level learning; they may not appreciate that there is a difference between teaching and learning at school level and that at higher level. Some of those advising prospective students may not appreciate that teaching and learning styles have changed significantly in both schools and the HE sector in the last two decades. Prospective students need to be very clear that they can and should expect a different style of learning, teaching and assessment from that found in schools – or indeed, in the case of many students from outside the UK, from that delivered by HEIs in their own country. Once at an institution, students need to be assured that they are being treated fairly and consistently regarding the opportunities they have for interaction with academic staff. Remedying this will include better pre-application information and explanation, but also institutions placing even more emphasis on the transition to higher education.

129. In short, the sub-committee believes that if the sector is serious about defending the diversity and distinctiveness of its teaching, it must provide robust and comparable information about what students can expect from their time in higher education to enable them to make an informed decision. This must include the nature and extent of contact time students can expect to receive and the approximate number of hours they will need for further study.

130. Moreover, even if the quality and standards of UK HE were comparable or indeed superior to that delivered overseas, the sub-committee believes that fewer contact hours may cause students – particularly international students – to consider that their degrees represent poor value for money. It could also lead to an international perception that an English degree is inferior to one from elsewhere. These perceptions need addressing, and the sub-committee believes that a central foundation to this is ensuring that those who are making financial commitments to HE know what they are getting for their investment, through the provision of robust and comparable information. A further, vital step is to ensure that potential students know that the culture of UK higher education is based to a great degree on independent learning and enquiry, particularly in some subjects.

Sub-committee's judgement on contact time and learning hours

Is there substance to the allegations? It is clear that 'contact hours' in the UK are shorter than elsewhere, but it does not follow that UK HE is of lower quality or has lower standards; the sub-committee can find no evidence for this.

Public confidence: This area has the potential to undermine public confidence both in the UK and overseas. However, academic rationale rather than public perception must drive institutions' teaching methods.

HEFCE's statutory duty: The sub-committee considers that contact hours are not HEFCE's responsibility under its statutory duty.

Recommendations:

R8. The sub-committee refers later in this report (R17 and R19) to the need for institutions to provide information in an appropriate common format. This should include information on the nature and amount of staff contact that students may expect, the nature of the learning effort expected, the time this will take, and the academic support that is likely to be available. Institutions should also publicise a clear rationale for the contact hours required for individual programmes and explain how these relate to other resources, such as the use of information technology (IT) and library provision.

R9. Institutions should continue to pay attention to student needs regarding the 'transition' into higher education.

The institutional audit method

131. Given that the institutional audit method is due for review before the current cycle ends in 2010-11, it is pertinent for the sub-committee to consider whether the method is adequate for meeting HEFCE's statutory needs in its current form and, if not, how it might be revised.

132. The sub-committee recognises that institutional audit has many strengths. It acknowledges institutional autonomy, its burden is proportionate and there is evidence that preparation for audit is beneficial to institutions in that it entails reflection on and evaluation of quality assurance systems at a high level. Institutions can also be sure that they have been judged using a comparable process.

133. The results of institutional audit should provide reassurance to HEFCE that the quality of HE is high. Since the start of the current cycle in 2002, 93.8 per cent of institutional audits have resulted in judgements of confidence (Annex C provides a fuller breakdown by year). Only 11 limited confidence judgements have been made, for a variety of reasons; the use of the Academic Infrastructure features in several reports, and the demands of collaborative provision create challenges for some institutions. Of 29 collaborative provision audits since 2004, two have resulted in limited confidence judgements; both included mention of external examiners.

134. QAA requires all institutions receiving a limited confidence judgement to draft and implement an action plan within a set timescale; this has been done satisfactorily in all cases. The fact that some limited confidence judgements have been made – although these are fortunately a small minority – is, the sub-committee believes, clear evidence that audit is effective in identifying problems. No judgements of 'no confidence' have been made in HEFCE-funded HEIs to date.

135. The move to institutional audit from subject-level scrutiny also reflects a high level of trust in the autonomous nature of HEIs as responsible awarding bodies, in that it is expected that institutions will maintain their internal systems and standards, report information accurately and honestly, and take appropriate action when necessary. HEFCE trusts QAA, and the auditors it trains, to identify any problems with quality systems and make appropriate judgements.

136. QAA carries out regular evaluations of institutional audits. These show that audit teams and institutions are broadly satisfied with the institutional audit process. Evaluation has also confirmed that the audit process has achieved its aims, with respondent groups identifying multiple benefits for the institution and students as a direct result of it.²⁸

137. It has been some time, however, since the QAF replaced the more burdensome subject review, which had an important role to play in establishing the levels of confidence and trust that enabled the move to the current framework. QAA also believes that the audit method has now evolved to a period of 'steady state', such that any further activity using the current method will probably only offer marginal returns in the continuing development of internal quality systems.²⁹ Its value for quality enhancement may therefore be increasingly limited.

138. Institutional audit has its limitations. The six-year audit cycle – albeit including a desk-based, mid-cycle review – means that problems, if they exist, could persist for some time before an outside body detects them. The steady-state cycle which provides comparability also means that the system is inflexible to major change which would result in an HEI being audited 'differently' at the end of the cycle from one audited at the beginning. This was the basis for some institutions' objections to including students in audit teams, although such inclusion has now been made optional. Such inflexibility can potentially act as a brake on mid-cycle innovation. The sub-committee acknowledges that revisions to the 'Code of practice' have been incorporated mid-cycle (e.g. those made to include work-based learning and e-learning more explicitly in the QAF). However, under the present system a significant change in method cannot be considered before the end of a six-year cycle, nor can the audit process easily be used to focus on a particular aspect should it be identified as a matter of public concern.

139. The sub-committee notes that QAA's Causes for Concern process, which can be used to instigate an investigation into potential poor quality or standards at an individual institution, is an effective way of responding to *specific* problems outside the normal cycle. HEFCE, for example, has requested two preliminary enquiries under this process: one in an FEC (following a poor Ofsted report) and one in an HEI, about responses to external examiners' recommendations. Both of these were addressed satisfactorily without recourse to the full Causes for Concern enquiry process.

140. As time goes on, it is questionable whether the audit reports are still the most suitable format for HEFCE, in terms of fulfilling its statutory responsibilities, for HEIs, or for the general public. The judgements made are extremely broad, whereas the reports are very detailed and technical; HEFCE takes account of the summary judgements, but does not tend to use the detail of the reports. The judgements themselves can be hard to understand, particularly 'limited confidence'; this indicates that institutions are still operating above a minimum quality threshold, but is unlikely to be recognised outside the HE sector. The status of a 'desirable' as opposed to an 'essential' recommendation may also not be clear beyond the sector.

²⁸ QAA annual report to HEFCE, January 2009.

²⁹ QAA paper, 'Possible approaches to institutional audit', presented to the sub-committee in January 2009.

141. The 'Outcomes from institutional audit' reports are valuable in their thematic approach, but a significant number of audits need to have been completed before meaningful summaries can be made. Potential students are not likely to be as interested in whole-institution audit reports as they were in subject-level reports. The reports are, however, of value to HEIs, where recommendations are taken seriously and acted on, and can thus lead to quality enhancement.

142. The current institutional audit cycle will be complete at the end of AY 2010-11, and HEFCE and the sector need to agree the method to apply after that time. QAA has identified a range of alternative approaches to the current model, which the sub-committee has discussed. The decision as to the final method must evolve through joint discussions between the sector, HEFCE, QAA and other interested parties, and must be subject to a full consultation. HEFCE must also ensure that the new method will allow it to discharge its statutory responsibilities satisfactorily.

143. In these discussions it will also be important to bear in mind higher education delivered in further education colleges which is directly funded by HEFCE. The current quality assurance method for such provision, Integrated Quality and Enhancement Review, comes to an end a year later than institutional audit, in 2011-12. It may be beneficial to consider how FECs might be better integrated in a new method, so that HE in FECs can be assessed in as similar a way as possible to that in HEIs.

144. HEFCE may wish to consider whether the new method should provide more targeted, themed reports on the identified areas of concern, or any other areas that may be considered appropriate. These will need to be provided more frequently than is currently the case with 'Outcomes from institutional audit' reports. Since much of the activity regarding standards will take place at subject level, it will be important to strike a balance between obtaining robust information (which could be used to respond to concerns) and placing too heavy a burden on institutions.

145. Discussions about the new method have raised the option of an assurance model that can respond proportionately to the risks to an institution's standards and quality; indeed, this was a QAFRG recommendation regarding collaborative provision.³⁰ Such a model has considerable attractions, but delivering a reliable set of quality indicators to determine risk will be a challenge, and the sub-committee is not convinced that it will be feasible to do so and maintain public confidence.

146. It is clear that the work of QAA and the role of institutions in quality assurance and audit are not widely understood, and that QAA's communication style is not very accessible to the wider public. This has an impact on public confidence.

Sub-committee's judgement on the institutional audit method

Public confidence: While the majority of 'confidence' judgements should provide public confidence in the quality of higher education, this confidence may not be maintained in

³⁰ See footnote 10.

the longer term, particularly as the concepts of audit and institutional autonomy may be poorly understood.

HEFCE's statutory duty: The sub-committee considers that the current audit method, if continued, will not provide HEFCE with sufficient evidence to fulfil its statutory duty. HEFCE and other partners should seriously consider amendments to the process, including the specific recommendations made in this report.

Recommendations:

To inform the joint discussions about the next audit method, the sub-committee would wish to advise HEFCE to consider the following recommendations, discuss them with relevant partners and aim to include them in consultation with the sector over the new method:

R10. QAA should take a significantly more public-facing role. Its remit must be clearly orientated towards maintaining public confidence in the quality and standards of HE. HEFCE should engage in discussion with QAA, UUK and GuildHE about how this could be operationalised, perhaps as part of the contract. Key QAA publications and communications should be available in plain English and accessible to non-experts.

R11. The new method should be flexible enough to adapt to the constantly changing external context in which the sector now operates, in the light of increased and rapid information flow, the development of more flexible teaching and learning methods, and the increasing variety of learning opportunities that HEIs are offering.

R12. To provide adaptability to change, it may be necessary to move away from a 'cycle' approach to planning, to a continuous improvement approach. The sub-committee acknowledges that this might require sacrificing a certain amount of comparability, but it should be possible to maintain a core element of assurance.

R13. The method should provide HEFCE and the sector with the ability to respond to concerns if they arise, although the sub-committee recognises that 'knee-jerk' responses to media reports are not desirable. This could include the regular provision of targeted, themed reports on areas of concern that are identified before they become media issues.

R14. HEFCE should consider how the methods used to assess HE delivered in HEIs and that delivered in FECs might be better integrated, as far as is possible.

R15. Following from the discussion of quality and standards in paragraphs 68-79, HEFCE, UUK and GuildHE should discuss with QAA how the audit method might be revised for HEFCE to retain confidence in the systems and processes for setting and maintaining standards.

Public information

147. In considering the impact of the provision of public information about quality and standards on HEFCE's strategic responsibility, the sub-committee concentrated on data specifically concerned with quality and in particular the Teaching Quality Information dataset outlined in the 'Background' section of this report.³¹ This dataset was developed in 2003 on the recommendations of a Task Group chaired by Sir Ron Cooke. The Task Group recognised that accurate, up-to-date information about the quality and standards of provision was important to:

- enable potential students and their advisers to make informed decisions
- inform the judgements of other stakeholders
- secure accountability for the use of public funds.³²

148. The TQI dataset was developed on the basis of the Task Group's recommendations rather than from scratch following consultation with its potential users, and it is recognised that not all of the data are of use to all of them. Some revisions were made following recommendations from the QAFRG, but the dataset is still not ideal. Potential and existing students require a great variety of information, of which data on quality are only a part. It is not always easy to draw a clear line between 'quality' and 'other' information, and nor do students necessarily make those distinctions in deciding where and what to study.

149. The Unistats web-site (www.unistats.com) is the primary way in which the TQI dataset is made available to the general public, and is specifically targeted at assisting students and their advisers in making decisions about where to study. This has increased the emphasis given to informed decision-making as the rationale for TQI and, it could therefore be argued, has placed the TQI dataset more within the realm of broader public information.

150. This location of TQI within a broader sphere of public information is potentially complex and confusing, given the different aims and objectives that may sit behind the provision of that information.

151. Over the years, the distinction between information that is useful to potential applicants and present students on the one hand, and for sector-specific quality assurance purposes on the other, has been blurred. Some of the information presently required by both HEFCE and QAA may be in a format that is not well suited to either student information or quality assurance, thus raising questions about the purpose of collecting or publishing it.

³¹ Policy regarding the TQI dataset and implementation of the NSS and Unistats is also considered by HEFCE's TQI/NSS Steering Group (membership and terms of reference at Annex E).

³² HEFCE 2003/51, 'Information on quality and standards in higher education: final guidance', www.hefce.ac.uk/pubs/hefce/2003/03_51/

152. It could be argued that the actual implementation of the public information part of the QAF has been only partially successful. While research has established that Unistats data are valuable, and significant user-tested marketing strategies have been employed, increasing site usage to the desired level has not yet been possible. Indeed, site usage is at only about 50 per cent of the intended target. The Unistats web-site has been in its current form only since 2007, having replaced the previous, less student-focused tqi.ac.uk site. Also worth noting is that since January 2009 the UCAS 'Apply' site has been linked to the Unistats site, so that when students apply to an institution (either HEI or FEC), relevant Unistats data are downloaded to the UCAS site for their consideration. This is expected to be a major driver of traffic to the Unistats site in future.

153. QAA audits have found that institutions' provision of the expected additional information is inconsistent. Several recommendations from recent institutional audits have stated that institutions need to ensure consistency in policy for providing information and in responsibilities for ensuring the accuracy and completeness of public information.³³ There is, however, little evidence that potential students use this information where it is provided. It is difficult to say whether this is because the information is not valued or because it is hard to find.

154. Despite the above, the National Student Survey should be considered a success story. The NSS is particularly high profile, and potential students value it. The good response rates for the survey indicate generally high levels of satisfaction (although satisfaction does not necessarily equate with good quality or appropriate standards). In 2008, over 210,000 students at HEIs, plus over 6,000 students studying HE in FECs (who were included for the first time), took part in the survey. They represented a total of 149 HEIs and 117 FECs. The 2009 survey saw all but one HEI reach an overall response rate of 50 per cent or higher, and a rise in overall satisfaction rate from 80 per cent in 2007 to 82 per cent. There is significant evidence that institutions and student unions make use of the data to help to improve the student learning experience, meaning that the NSS has become an important part of enhancement activity.

155. A small number of stories have appeared in the media suggesting that institutions have brought inappropriate influence to bear on students' responses to the NSS. These allegations have raised questions over the level of trust that can be placed in the sector and in this element of the quality assurance system. The sub-committee is content that HEFCE has followed up these allegations thoroughly, and that appropriate action has been taken where necessary. This has included removing data from the web-site, publishing strengthened guidance on the provision and use of data, and discussions with individual institutions about their own actions and data.

156. The introduction of further surveys of international students (the International Student Barometer), postgraduate taught students (the PTES) and postgraduate research students (the PRES) has been welcomed by higher education providers, many of which have contracted to operate these optional exercises. The results are becoming important inputs to quality assurance and enhancement activities in many institutions: the managed use of such results could provide further public information on UK higher education provision.

³³ See footnote 28.

157. Institutions' provision of public information would appear, not surprisingly, to be the focus of less attention through institutional audit than issues of quality and standards. Although QAA considers the available information, including NSS results, as part of a wider portfolio of evidence, reports from institutional audits offer only a comment on the information's completeness and accuracy, rather than a formal confidence judgement as is the case with quality and standards. This means that even if a problem with information were identified, there is potentially less impetus for the institution to address it, as it does not impact on the institution's quality status. In short, the 'stakes' for institutions regarding public information are not as high as they are for quality and standards. If a common set of desired information were to be drawn up after consultation with users, then it might be possible for QAA to form a judgement on how far each institution complies with information requirements. IQER summative reviews include a 'conclusion' on whether reliance can be placed on the accuracy and completeness of information. This is treated more like a judgement, because if reliance on the information cannot be assured, then the institution could receive a limited or even no confidence result.

158. The National Student Forum, set up by the Government in February 2008 to give a greater voice to students on HE courses across England, considered information, advice and guidance (IAG) to students in its first annual report.³⁴ The forum considered that IAG in general is in need of improvement and that while plenty of information is available, it is not presented in a cohesive way. TQI competes with a great variety of other sources of IAG, some of which may appear more attractive or accessible to potential students. Information about what a course will really be like, in terms of study hours (including student effort) or course content is also hard to come by. The NUS student experience report (which covers HEIs only) notes that the most popular sources for information about institutions are the institutions' own web-sites (used by 78 per cent of students and 85 per cent of school leavers) and UCAS (used by 70 per cent of students and 72 per cent of school leavers).³⁵ This suggests that the ideal place to put most information is on institutions' own web-sites, but to do so would prevent the current data checks that operate with TQI and could reduce compliance.

159. As part of its response to the National Student Forum report, the Government has asked HEFCE and QAA to explore how HEIs can improve student access to course and module descriptors, and whether programme specifications could be adapted or enhanced to be more accessible to potential students. The difficulty is that accessible, applicant-oriented information could be incompatible with the format that HEIs need for validation or audit purposes. The Government also has two further relevant initiatives underway: a feasibility study to create a single student portal through which to access information (part of the IAG initiative) and a transfer of Unistats to the Directgov web-site. Either or both of these initiatives could have an impact on quality assurance arrangements.

³⁴ National Student Forum, 'Annual report 2008', www.dius.gov.uk/higher_education/students/student_listening_programme/national_student_forum

³⁵ See footnote 25.

160. The sub-committee believes that potential and current students must have robust and comparable information available to them in a transparent, accessible manner on the various learning opportunities on offer in HE, in terms of the quality of the teaching on offer (from QAA audit/reviews and, more broadly, relevant TQI data) and what they can expect from the wider student experience. This provision of information is particularly important in a diverse sector where practice can vary and when students' expected personal financial commitments to HE are growing. It is also important that up-to-date and accurate information about HE is available in schools, and that career and education advisers keep their knowledge current.

161. HEFCE and the sector need to differentiate in a more sophisticated manner between the content and format of information provided for prospective and current students and that which is needed for programme validation and quality assurance purposes. In some instances the same content and format will serve both purposes, in others they will not.

162. Overall, this report makes many recommendations about information, advice and guidance. These need to be considered together and taken forward as part of national developments in this area, including consideration of matters such as a series of guidance leaflets, web information produced by institutions, and nationally available comparable data.

Sub-committee's judgement on public information

Public confidence: Public information has much greater potential to be used to educate and inform the public about all aspects of HE, including both academic and non-academic aspects of student life. This has been discussed in other sections of this report. Reforming the provision of public information will require changes to its content, format and location.

HEFCE's statutory duty: Public information in its current format does not present a risk to HEFCE's statutory duty. However, if information is developed to be used specifically as part of quality assessment, and will be formally judged as such, then the matter will need renewed consideration.

Recommendations:

Given the challenges outlined above, the sub-committee believes that significant improvements could be made in this area and makes the following recommendations to HEFCE:

R16. The TQI/NSS Steering Group should review the efficiency, effectiveness and use of current Teaching Quality Information initiatives, including Unistats and the NSS, and consider the outcomes of the feasibility study on moving information to a single web portal. This should take account of recommendations for information included elsewhere in this report.

R17. HEFCE should initiate detailed research into understanding the needs of the intended users of the information (students, parents, employers and other

stakeholders). Users should be properly surveyed to find out what information they want to have and how they would prefer to access it (e.g. on a single portal website, or on institutional sites according to degree programme, department or subject). Research should include consideration of the suggestions for additional information in other recommendations of this report.

R18. HEFCE should request that QAA's evaluation of the Academic Infrastructure include consideration of how aspects of it could be made more accessible to the wider public, especially potential students.

R19. Once HEFCE, representative bodies and the sector have agreed a set of required information (drawing on the research in R17), institutions should be required to make the relevant information available in an appropriate common format. This should form part of audit and review, although the sub-committee recognises that it may not be available at the start of the revised quality audit method in 2011-12.

R20. It should then be possible for QAA to take a significantly firmer view on institutions' provision of public information in institutional audit. This should enable formal reporting of this area in audit outcomes to rise from 'comment' to 'judgement'.

R21. HEFCE needs to distinguish clearly between the information it requires for quality assurance purposes and that which is required for public information purposes.

Conclusions

163. The TQSE sub-committee was asked to establish whether or not HEFCE is currently able to fulfil its statutory responsibility and express confidence in the sector, and if not, what action it needs to take. A list of all judgements and recommendations is at Annex A.

164. The sub-committee considered each of the areas above in the context of the existing outputs of the Quality Assurance Framework. It concludes that, while there is no evidence of a systemic failing in quality across the HE sector – indeed, there are many measures demonstrating the general good standing of the sector, such as institutional audit and NSS results – some areas clearly require further work. The QAF requires a number of changes to provide HEFCE with continued confidence that it is fulfilling its statutory responsibilities and for the sector to be able to demonstrate its high quality and standards. In particular, any quality assurance method needs to be more flexible than is currently the case, to be able to adapt to the continually varying context and challenges the sector faces. HEFCE, UUK and GuildHE will have to work with QAA and the sector to ensure that future quality assurance methods can meet this need.

165. There is clearly a danger that allegations of poor quality could damage public confidence in higher education. In the sub-committee's view, better public information which is widely accessible, in terms of both its content and its availability, is key to addressing this. Potential students, the media and the wider public require clearer

explanations of what higher education entails, and how its quality is assured. Much of this concerns work that institutions are already doing – such as addressing plagiarism or reviewing assessment procedures – and they should not miss an opportunity to promote their own efforts. HEFCE will need to work with institutions delivering HE and key stakeholders to develop an information set that can fulfil public requirements.

166. The sub-committee acknowledges that addressing the recommendations in this report could be challenging both for HEFCE and for institutions, particularly in a context of increasing economic pressures. It also recognises that, in taking action, HEFCE must consider not only the institutions and organisations with which it works directly, but also the wider UK HE system. However, the sector cannot afford to compromise on quality. It is vital that institutions recognise that challenges to quality and standards are serious issues. Addressing them – and being able to demonstrate that they have done so – must be a strategic priority for HEFCE and institutions alike. Correcting both real and perceived problems now will put the sector on a firmer footing to meet future challenges.

Next steps

167. The recommendations set out in the report and in Annex A represent the sub-committee's advice to HEFCE on how its statutory duty should be fulfilled. Clearly, the primary vehicle for achieving this will be the Quality Assurance Framework. Equally clearly, the new quality assurance method, to apply in HEIs in England and Northern Ireland from 2011-12 onwards, will be crucial. However, HEFCE alone cannot dictate this method; it will need to be agreed with institutional representative bodies and with institutions themselves, with advice from QAA. Further education colleges will need to play a full part in these discussions.

168. The sub-committee is aware that a number of groups are currently discussing quality assurance, standards and the QAF. QAA began internal discussions about the QAF's evolution some time ago, which it is now sharing with key stakeholders. UUK, GuildHE and QAA have established a national Quality Forum to discuss emerging quality issues. Discussions are taking place between HEFCE, QAA, UUK, GuildHE, the NUS and the Association of Colleges to develop proposals for the key principles and processes of a new QAF. Following agreement by the relevant bodies, these will be the subject of a joint consultation in late 2009/early 2010. Following the sector's agreement of key principles, QAA will develop the detail of the process and operational description and will carry out consultation on a handbook for the new method in the autumn of 2010.

169. As the Quality Assurance Framework is jointly owned by the sector and HEFCE and applies across the sector, the sub-committee considers that it will only be possible to address future concerns adequately by forming a jointly owned group to take formal and continuing responsibility for the ongoing maintenance and development of the QAF. HEFCE, UUK and GuildHE would 'own' this group as joint sponsors of the QAF, but QAA, the NUS and the Association of Colleges would also be full members. The group should include institutional representatives too. The Department for Business, Innovation and Skills and other UK bodies, i.e. from Scotland, Wales and Northern Ireland, should also attend as observers, given the UK-wide ownership of the Academic Infrastructure. This group could monitor the QAF as it is rolled out and take decisions on any changes and revisions that may be needed including, if the process develops along these lines,

making periodic decisions about new areas for audit to investigate. The group should communicate regularly with the wider sector through existing channels, and should consider how communication strategies with the wider public might be developed.

170. The sub-committee acknowledges that its work has not considered everything of relevance to the QAF, but has concentrated on the main concerns raised. It is for the joint owners of the QAF, in collaboration with other key stakeholders, to ensure a full discussion of all necessary elements that the QAF should include. The sub-committee understands that once a new process and operational description have been provisionally agreed by all stakeholders, the sector will be consulted as standard practice.

Annex A

Summary of judgements and recommendations

Section	Judgements	Recommendations
Quality and Standards	<p><i>Public confidence:</i> There is a risk that public confidence in quality assurance may be undermined if the terms in which it is discussed cannot be understood.</p> <p><i>HEFCE's statutory duty:</i> Clarification of responsibilities will help HEFCE to maintain its role and explain it to others. While standard setting must be the responsibility of institutions – and the collective responsibility of the sector – HEFCE has a legitimate interest in knowing that standards are appropriate and are being maintained.</p>	<p>R1. The sub-committee considers that the distinct definitions of 'quality' and 'standards' are both helpful and necessary, but an explanation of how the two relate to each other and who is responsible for what should be prepared in a format more appropriate for public use. This should be widely publicised. HEFCE, QAA, the NUS and representative bodies should agree a draft and an appropriate communications strategy. Any published guidance needs to be brief and in language that is clear and accessible.</p>
Admissions procedures	<p><i>Is there substance to the allegations?</i> The sub-committee found no evidence of systemic failure in admissions procedures. Its members are aware of the potential for anecdote to feed media allegations of falling admissions standards in the context of financial and commercial pressures, but consider that the procedures presently in place, along with the institutional imperative to protect reputation, are more than sufficient to ensure that appropriate admissions standards are upheld.</p> <p><i>Public confidence:</i> Despite the above, the incidence of negative public perception of this area needs to be addressed.</p>	<p>R2. Each institution should develop a statement about the support arrangements that international students can expect from the institution, both in making the transition to the UK and in their continuing studies. This should include support in the English language and for personal and academic issues as appropriate. Clearer guidance should be provided to international students and their advisers about higher education teaching, learning and assessment practices in England.</p>

	<p><i>HEFCE's statutory duty:</i> The sub-committee considers that, overall, there is sufficient evidence to be confident that admissions procedures, including those for international students, are sound and do not currently present a threat to the fulfilment of HEFCE's statutory duty.</p>	
Degree classifications	<p><i>Is there substance to the allegations?</i> The degree classification system (but not the standards of degrees themselves) is an area of difficulty. The sub-committee regards the Higher Education Achievement Record as an appropriate change to begin to address this issue, although it will not solve all problems around comparability. The sector has recognised this and is taking the HEAR forward.</p> <p><i>Public confidence:</i> There is a risk to public confidence, mitigated by the work of the Burgess Group.</p> <p><i>HEFCE's statutory duty:</i> The sub-committee considers that there is no issue regarding HEFCE's statutory responsibility.</p>	<p>R3. The sector should continue to take forward as rapidly as is prudent the recommendations of the Burgess Group. HEFCE should consider what further support might be made available to institutions in introducing the HEAR and disseminating information to students, employers and an international audience about its purpose.</p>
Plagiarism	<p><i>Is there substance to the allegations?</i> There will always be instances of plagiarism, but institutions take the issue very seriously and are continuing to develop ways to detect and address it.</p> <p><i>Public confidence:</i> Negative public perception is a serious concern.</p> <p><i>HEFCE's statutory duty:</i> The sub-committee considers that there is sufficient evidence to be confident that plagiarism</p>	<p>R4. The sub-committee recommends that to support public confidence, institutions continue to enforce their policies in a consistent manner. They should ensure that staff and students are aware of the professional advice available nationally, such as that provided by the Higher Education Academy. Institutions should also help the public to understand what they do by publicising their policies in an accessible format.</p>

	does not currently present a threat to the fulfilment of HEFCE's statutory duty.	
External examiners	<p><i>Is there substance to the allegations?</i> The system is under strain, and some substantive areas would benefit from support and improvement.</p> <p><i>Public confidence:</i> Negative public perception is a serious concern. There is a need to educate the wider public about the role of the external examiner system and what it can and cannot do.</p> <p><i>HEFCE's statutory duty:</i> The sub-committee considers that there is sufficient evidence to be confident that the external examiner system is robust enough to enable HEFCE to fulfil its statutory duty at present. It is not certain, however, that this will continue unless changes are made to the system.</p>	<p>R5. The sub-committee considers that a full review of the external examiner system is needed, and that it is particularly important to consider the following:</p> <ol style="list-style-type: none"> a. Provision of sufficient confidence to all relevant stakeholders, including HEFCE, that standards of awards are at an appropriate level and comparable across the sector. External examiners' role in this regard should be clarified and communicated to a wider audience. b. Provision of an independent recourse by which external examiners feel able to raise issues or concerns when routes within institutions' own processes are exhausted (this is of critical importance to public confidence). c. Whether the system is sufficiently well supported by institutions to function effectively. d. Whether the system is appropriate to changing practice. e. Whether external examining is sufficiently well recognised in promotion procedures. f. General terms of reference for the external examiner role, including a job description, should be agreed across the sector. This will help to ensure consistency and comparability,

		<p>and make it easier to explain to the public at large exactly what role external examiners play in assuring standards. It may be most appropriate for QAA to include this in the relevant section of its 'Code of practice'.</p> <p>g. The sub-committee specifically recommends that at audit a representative sample of external examiners is interviewed by the panel.</p>
Assessment and feedback	<p><i>Is there substance to the allegations?</i> Evidence from QAA and the NSS suggests that assessment and feedback are challenging areas for the sector. The sub-committee does not consider that there is evidence of a systemic failure in the sector, but institutions should not be complacent and need to work continually to ensure that practices are consistent and robust.</p> <p><i>Public confidence:</i> There is a risk to public confidence if accusations of 'dumbing down' continue to be made.</p> <p><i>HEFCE's statutory duty:</i> The sub-committee considers that there is sufficient evidence for HEFCE to be confident that existing assessment practices are robust enough to enable it to fulfil its statutory duty.</p>	<p>R6. Institutions should ensure that assessment methods and criteria are easy to interpret and widely available through public media such as web-sites, course prospectuses and student handbooks.</p> <p>R7. Institutions should continue to review and improve their processes for offering formative feedback to students and aim to ensure that it is useful, timely and appropriate.</p>
Contact time and learning hours	<p><i>Is there substance to the allegations?</i> It is clear that 'contact hours' in the UK are shorter than elsewhere, but it does not follow that UK HE is of lower quality or has lower standards; the sub-committee can find no evidence for this.</p>	<p>R8. The sub-committee refers below (R17 and R19) to the need for institutions to provide information in an appropriate common format. This should include information on the nature and amount of staff contact that students may expect, the nature of the learning effort expected, the time this will take, and the academic support that is</p>

	<p><i>Public confidence:</i> This area has the potential to undermine public confidence both in the UK and overseas. However, academic rationale rather than public perception must drive institutions' teaching methods.</p> <p><i>HEFCE's statutory duty:</i> The sub-committee considers that contact hours are not HEFCE's responsibility under its statutory duty.</p>	<p>likely to be available. Institutions should also publicise a clear rationale for the contact hours required for individual programmes and explain how these relate to other resources, such as the use of IT and library provision.</p> <p>R9. Institutions should continue to pay attention to student needs regarding the 'transition' into higher education.</p>
<p>The institutional audit method</p>	<p><i>Public confidence:</i> While the majority of 'confidence' judgements should provide public confidence in the quality of higher education, this confidence may not be maintained in the longer term, particularly as the concepts of audit and institutional autonomy may be poorly understood.</p> <p><i>HEFCE's statutory duty:</i> The sub-committee considers that the current audit method, if continued, will not provide HEFCE with sufficient evidence to fulfil its statutory duty. HEFCE and other partners should seriously consider amendments to the process, including the specific recommendations made in this report.</p>	<p>To inform the joint discussions about the next audit method, the sub-committee would wish to advise HEFCE to consider the following recommendations, discuss them with relevant partners and aim to include them in consultation with the sector over the new method:</p> <p>R10. QAA should take a significantly more public-facing role. Its remit must be clearly orientated towards maintaining public confidence in the quality and standards of HE. HEFCE should engage in discussion with QAA, UUK and GuildHE about how this could be operationalised, perhaps as part of the contract. Key QAA publications and communications should be available in plain English and accessible to non-experts.</p> <p>R11. The new method should be flexible enough to adapt to the constantly changing external context in which the sector now operates, in the light of increased and rapid information flow, the development of more flexible teaching and learning methods, and the increasing variety of learning opportunities that HEIs are offering.</p> <p>R12. To provide adaptability to change, it may be necessary to move away from a 'cycle' approach to planning, to a continuous</p>

		<p>improvement approach. The sub-committee acknowledges that this might require sacrificing a certain amount of comparability, but it should be possible to maintain a core element of assurance.</p> <p>R13. The method should provide HEFCE and the sector with the ability to respond to concerns if they arise, although the sub-committee recognises that ‘knee-jerk’ responses to media reports are not desirable. This could include the regular provision of targeted, themed reports on areas of concern that are identified before they become media issues.</p> <p>R14. HEFCE should consider how the methods used to assess HE delivered in HEIs and that delivered in FECs might be better integrated, as far as is possible.</p> <p>R15. Following from the discussion of quality and standards in paragraphs 68-79 of the report, HEFCE, UUK and GuildHE should discuss with QAA how the audit method might be revised for HEFCE to retain confidence in the systems and processes for setting and maintaining standards.</p>
Public information	<p><i>Public confidence:</i> Public information has much greater potential to be used to educate and inform the public about all aspects of HE, including both academic and non-academic aspects of student life. This has been discussed in other sections of the report. Reforming the provision of public information will require changes to its content, format and location.</p> <p><i>HEFCE’s statutory duty:</i> Public information in its current</p>	<p>R16. The TQI/NSS Steering Group should review the efficiency, effectiveness and use of current Teaching Quality Information initiatives, including Unistats and the NSS, and consider the outcomes of the feasibility study on moving information to a single web portal. This should take account of recommendations for information included elsewhere in this report.</p> <p>R17. HEFCE should initiate detailed research into understanding the needs of the intended users of the information (students, parents,</p>

	<p>format does not present a risk to HEFCE's statutory duty. However, if information is developed to be used specifically as part of quality assessment, and will be formally judged as such, then the matter will need renewed consideration.</p>	<p>employers and other stakeholders). Users should be properly surveyed to find out what information they want to have and how they would prefer to access it (e.g. on a single portal web-site, or on institutional sites according to degree programme, department or subject). Research should include consideration of the suggestions for additional information in other recommendations of this report.</p> <p>R18. HEFCE should request that QAA's evaluation of the Academic Infrastructure include consideration of how aspects of it could be made more accessible to the wider public, especially potential students.</p> <p>R19. Once HEFCE, representative bodies and the sector have agreed a set of required information (drawing on the research in R17), institutions should be required to make the relevant information available in an appropriate common format. This should form part of audit and review, although the sub-committee recognises that it may not be available at the start of the revised quality audit method in 2011-12.</p> <p>R20. It should then be possible for QAA to take a significantly firmer view on institutions' provision of public information in institutional audit. This should enable formal reporting of this area in audit outcomes to rise from 'comment' to 'judgement'.</p> <p>R21. HEFCE needs to distinguish clearly between the information it requires for quality assurance purposes and that which is required for public information purposes.</p>
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Annex B

TQSE sub-committee – terms of reference and membership

1. The overall purpose of the TQSE sub-committee is to advise the HEFCE Board on how best to fulfil its statutory duty regarding the quality of HE provision, as set out in section 70 (1) of the Further and Higher Education Act 1992:

Each council shall

(a) secure that provision is made for assessing the quality of education provided in institutions for whose activities they provide, or are considering providing, financial support under this Part of this Act, and

(b) establish a committee, to be known as the “Quality Assessment Committee”, with the function of giving them advice on the discharge of their duty under paragraph (a) above and such other functions as may be conferred on the committee by the council.

2. To achieve this, the sub-committee will:

a. Consider evidence from the sector (commissioning research where appropriate) on quality and standards, and will advise HEFCE as to whether action is necessary.

b. Establish what information HEFCE needs to maintain confidence in the quality of publicly funded higher education.

c. Advise the board, via TQSE, on the form of reporting that should be requested from the Quality Assurance Agency.

d. Advise HEFCE on implementing its policy on quality assurance in England.

e. Contribute to discussions on the revision of the Quality Assurance Framework, and in particular the quality assurance method that should be applied to English HEIs from 2011-12 onwards.

Outputs

3. Regular updates to the HEFCE Board. These will normally be submitted at the same time as the main TQSE committee’s report. The main committee may discuss and add a comment to the sub-committee’s reports.

4. Pursuant to 2b above, early advice, by January 2009, on what additional information may be needed.

5. An interim report in April 2009 on progress.

6. A report in July 2009 that:
 - a. Responds to the issues raised over the last few months about perceived problems in quality.
 - b. Sets out the evidence demonstrating whether there are or are not any problems
 - c. Makes recommendations to address these, if appropriate.

Frequency of meetings

7. It is expected that the sub-committee will meet approximately five times during AY 2008-09. The first two meetings will probably be in quick succession at the end of 2008 or beginning of 2009; thereafter the meetings should aim to feed into TQSE meetings, which take place in March, June and September 2009.

Duration of sub-committee

8. The sub-committee will be set up for AY 2008-09 in the first instance. At the end of this period the board will review the need for the sub-committee to continue, in light of the report's findings and any other developments that may have arisen.

Members

Chair	Professor Colin Riordan	Vice-Chancellor University of Essex
TQSE member	Professor Ella Ritchie	Pro-Vice-Chancellor (Teaching and Learning) University of Newcastle upon Tyne
TQSE member	Professor Caroline Gipps	Vice-Chancellor University of Wolverhampton
Sector representative	Professor Muriel Robinson	Principal Bishop Grosseteste University College Lincoln
Sector representative	Professor Paul White	Pro-Vice-Chancellor for Learning and Teaching University of Sheffield
Sector representative	Professor Robert Burgess	Vice-Chancellor University of Leicester
Sector representative (HE in FECs)	Michele Sutton	Principal and Chief Executive Bradford College
PSRB	Professor Matthew Harrison	Director, Education Programmes Royal Academy of Engineering

Observers

UUK	Fiona Hoban	Policy Adviser
GuildHE	Helen Bowles	Policy Adviser
QAA	Stephen Jackson <i>or</i> Jayne Mitchell	Director of Reviews Director, Development and Enhancement Group
Higher Education Academy	Sean Mackney	Deputy Chief Executive
Association of Colleges (as needed)	Joy Mercer	Quality Manager
National Union of Students	Aaron Porter	Vice-President (Higher Education)

HEFCE officers

John Selby	Director, Education and Participation
Heather Fry	Head of Learning and Teaching
Chris Taylor	Senior HE Policy Adviser
Emma Creasey	HE Policy Adviser

Annex C

Results of audit and review activity between 2002 and 2009

The tables below provide an overview of audit/review results between 2002 and 2009 (to date).

Institutional audit

Period	Total number of audits	Confidence	Limited confidence	No confidence	% of confidence judgements in that year	Cumulative rolling %
AY 2002-03	24	24	0	0	100	100
AY 2003-04	46	42	4	0	91.3	94.3
AY 2004-05	44	42	2	0	95.5	94.7
AY 2005-06 *	12	12	0	0	100	95.2
FY 2006-07	3	2	1	0	66.7	94.6
FY 2007-08	24	23	1	0	95.8	94.8
FY 2008-09	23	20	3	0	87	93.8
Total	176	165	11	0		93.4

* After this point results were reported in financial years (FY) rather than academic years. No institutions are missing or have been duplicated.

Collaborative provision audit

Period	Total number of audits	Broad confidence	Limited confidence	No confidence	% of confidence judgements
AY 2004-05	2	1	1	0	50
AY 2005-06	21	20	1	0	95.2
AY 2006-07	6	6	0	0	100
AY 2007-08	0	0	0	0	N/A
AY 2008-09	0	0	0	0	N/A
Total	29	27	2	0	93.1

Annex D

QAA's 'Outcomes from institutional audit'

List of published papers

Title	Series 1 papers	Series 2 papers
Initial overview	April 2005	March 2008
External examiners and their reports	April 2005	June 2008
Programme specifications	April 2005	
Staff support and development arrangements	October 2005	November 2008
Student representation and feedback	November 2005	February 2009
Programme monitoring arrangements	January 2006	October 2008
Assessment of students	January 2006	June 2008
Learning support resources (including virtual learning environments)	January 2006	March 2008
Validation, approval and periodic review*	January 2006	
Work-based and placement learning, and employability	March 2006	April 2008
Arrangements for international students	March 2006	June 2008
Progression and completion statistics	March 2006	March 2008
Collaborative provision in the institutional audit reports	March 2006	May 2008
Specialist institutions	July 2006	
The framework for higher education qualifications in England, Wales and Northern Ireland	July 2006	
Subject benchmark statements	September 2006	
Arrangements for combined, joint and multidisciplinary honours degree programmes	October 2006	November 2008
Institutions' work with employers and	October 2006	August 2008

professional, statutory and regulatory bodies		
Academic guidance, support and supervision, and personal support and guidance	October 2006	
Institutions' support for e-learning	November 2006	August 2008
Institutions' frameworks for managing quality and academic standards	December 2006	March 2008
Institutions' support for widening participation and access to higher education**	December 2006	April 2008
The contribution of the student written submission to institutional audit	April 2007	
The adoption and use of learning outcomes	May 2007	
The self-evaluation document in institutional audit	October 2007	February 2009
Recruitment and admission of students	N/A	June 2008
Institutions' intentions for enhancement	N/A	
Institutions' support for students with disabilities		March 2009
Series 1: Closing overview	February 2008	
Series 1 Summaries	February 2008	

* Titled 'Validation and approval of new provision, and its periodic review' in series 2.

** Titled 'Institutions' arrangements to support widening participation and access to higher education' in series 2.

All of these publications are available to download at
www.qaa.ac.uk/reviews/institutionalAudit/outcomes/outcomes1.asp

Annex E

TQI/NSS Steering Group – membership and terms of reference

Terms of reference

1. The TQI and NSS Steering Group will advise the UK funding bodies and the other bodies sponsoring and implementing the TQI and NSS projects, on the management and ongoing development of these projects. This will involve receiving such reports and papers to enable the group to:
 - a. Advise on the ongoing and future development of policy on teaching quality information, taking into account any developments in quality assurance and enhancement as appropriate.
 - b. Advise on the ongoing development of the NSS, including its scope and coverage, administration and survey methodology, frequency, timing and questionnaire design.
 - c. Advise on any substantive developments of the Unistats web-site.
 - d. Advise on the specification for sector-level analysis of NSS data, and advise on what action should be taken as a result of any such analysis
 - e. Advise on the dissemination of NSS data to individual institutions and students' unions, receiving updates on progress
 - f. Commission and receive advice from the TQI Technical Working Group.
 - g. Receive advice from the TQI HE in FECs sub-group.
 - h. Advise on the risks involved in these initiatives.

Membership

Name	Position	Status	Organisation
Professor Janet Beer	Chair	Chair	Vice-Chancellor Oxford Brookes University
Professor Margaret Andrews	Member	HEI England rep	Pro-Vice-Chancellor Canterbury Christ Church University
Robert J M Craik	Member	HEI Scotland rep	Deputy Principal (Learning and Teaching) Heriot-Watt University

Noel Morrison	Member	HEI England rep	Academic Registrar Harper Adams University College
Jim Mutton	Member	Chair of TQI for HE in FE Steering Group	Principal Loughborough College
Professor Jonathan Osmond	Member	HEI Wales rep	Pro-Vice-Chancellor Learning, Teaching and Students, Cardiff University
Aaron Porter	Member	NUS rep	Vice-President Education National Union of Students
Professor Susan Price	Member	HEI England rep	Acting Vice-Chancellor University of East London
Keith Zimmerman	Member	HEI England rep	Director of Student Admin University of Oxford
Jane Artess	Observer	HE Careers Service Unit rep	Research Manager HE Careers Service Unit
Helen Bowles	Observer	GuildHE	Policy Adviser GuildHE
Laura Carroll	Observer	Department for Employment and Learning rep	Higher Education Policy Branch Department for Employment and Learning
John Ennis	Observer	Skills for Health rep	Skills for Health
Heather Fry	Observer	HEFCE	Head of Learning and Teaching HEFCE
Martin Furner	Observer	Training and Development Agency for Schools rep	Data Collections and Analysis Training and Development Agency for Schools
Fiona Hoban	Observer	UUK rep	Policy Adviser Universities UK
Gerard Madill	Observer	Universities Scotland	Policy Adviser Universities Scotland
Cliona O'Neill	Observer	Higher Education Funding Council for Wales rep	Senior Learning and Teaching Manager Higher Education Funding Council for Wales

Mandy Nelson	Observer	QAA rep	Head of Information Unit Quality Assurance Agency
Lisa Newbury	Observer	HE Wales	Policy Adviser Higher Education Wales
Hannah Pudner	Observer	NUS staff rep	National Union of Students
Richard Puttock	Observer	HEFCE	Senior Analyst HEFCE
Professor Paul Ramsden	Observer	Higher Education Academy rep	Chief Executive Higher Education Academy
Professor Robin Sibson	Observer	Higher Education Statistics Agency rep	Chief Executive Higher Education Statistics Agency
Lesley Sutherland	Observer	Scottish Funding Council rep	Assistant Director of Learning Policy and Strategy Scottish Funding Council
Sami Benyahia	Invitation	Ipsos MORI	Research Director, Ipsos MORI
Virginia Isaac	Invitation	UCAS	Director of Business Development UCAS
Julia Moss	Secretariat	HEFCE	
Chris Taylor	Secretariat	HEFCE	