

HEFCW circular W19/22HE: Annex A

Cyngor Cyllido Addysg
Uwch Cymru
Higher Education Funding
Council for Wales

hefcw

Quality Assessment Framework for Wales

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Noddir gan
Lywodraeth Cymru
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Introduction

1. The Quality Assessment Framework (QAF) for Higher Education in Wales sets out the mechanisms through which HEFCW will assure itself that the quality of education, or a course of education, provided by or on behalf of regulated institutions meets the needs of those receiving it. It sets out how HEFCW takes account of its statutory responsibility for ensuring that assessment is carried out of the provision offered by or on behalf of regulated institutions, and how we are assured of quality when an institution applies for a Fee and Access Plan.
2. The Framework will continue to be updated as appropriate, taking account of consultation, so ***it is the responsibility of users to ensure that they are using the most recent version***. We will clearly indicate on our [website](#) when we publish updates.
3. HEFCW has received confirmation that the Framework meets the Home Office requirements for educational oversight. This means that regulated institutions meet the quality requirements for Tier 4 status.

Background

4. The [Higher Education \(Wales\) Act 2015](#) (the 2015 Act) sets out interventions that apply where HEFCW is satisfied that the quality of education or a course provided by or on behalf of a regulated institution is, or is likely to become, inadequate to meet the reasonable needs of students. These are detailed in HEFCW's [Statement of Intervention](#).

Areas of UK comparability

5. The Quality Assessment Framework will achieve UK 'read-across' through the following shared mechanisms:
 - Shared degree standards, through the UK-wide Framework for Higher Education Qualifications (FHEQ);
 - A strengthened external examining system;
 - A shared approach to the quality-related elements of the Baseline Regulatory Requirements;
 - The Register of Higher Education Providers, with discussions ongoing between the parties regulating higher education to move towards a more UK-wide approach;
 - The ability of Welsh institutions to participate in the Teaching Excellence Framework, if they wish.
6. In developing this work HEFCW has monitored, and will continue to monitor, developments in other parts of the UK to evaluate any impact on Wales. We will also work to ensure that any changes to Quality Assessment (QA) in Wales do not impact adversely on the reputation of provision internationally.

Key features

7. The key features of the quality assessment framework for Wales are as follows:
 - (i) The removal of cyclical funding body-commissioned peer review visits to re-test baseline quality requirements for established providers;
 - (ii) The re-shaping of a provider's own review processes to ensure that these are focused on improving student outcomes and the student academic experience;
 - (iii) Placing greater emphasis on the role of governing bodies for providing assurances about quality and standards matters;
 - (iv) The more systematic use of student and other data by funding and regulatory bodies to monitor the performance of providers;
 - (v) The use of existing funding and regulatory body assurance mechanisms.

8. In addressing HEFCW's statutory responsibilities for quality we use the [European Standards and Guidelines](#) (ESG) as a key reference point.

Principles

9. The principles of the framework are as follows. The quality assessment system:
 - (i) Is based on the autonomy of higher education providers with degree awarding powers to set and maintain academic standards, and on the responsibility of all providers to determine and deliver the most appropriate academic experience for their students wherever and however they study;
 - (ii) Uses peer review and appropriate external scrutiny as a core component of quality assessment and assurance approaches;
 - (iii) Has students integrated as partners in the design, implementation, monitoring and reviewing of processes to improve the quality of their education;
 - (iv) Provides accountability, value for money, and easily understood assurance to students, and to employers, government and the public, in the areas that matter to those stakeholders, both in relation to individual providers and across the sector as a whole;
 - (v) Works well for increasingly diverse and different missions, and types of providers, and ensures that providers are able to experiment and innovate in strategic direction or in approaches to learning and teaching;
 - (vi) Adopts a risk- and evidence-based approach to co-regulation to ensure that regulatory scrutiny focuses on the areas where risk, or the potential for risk, to standards and/or to the academic experience of students or the system is greatest;
 - (vii) Intervenes early and rapidly but proportionately when things go wrong;
 - (viii) Provides support for new or less mature providers, while ensuring that the threshold for entry into the sector is set at a level sufficient for an appropriately high quality academic experience and secure degree standards;

- (ix) Uses a robust evidence base to ensure that opportunities for continuous improvement are identified and exploited by all providers;
- (x) Maintains, as far as is possible in a devolved system, a UK-wide approach;
- (xi) Protects the reputation of the UK higher education system in a global context;
- (xii) Ensures that the overall cost and burden of the quality assessment and wider assurance system is proportionate.

Baseline regulatory requirements

10. In March 2016 the funding bodies in England and Northern Ireland published a revised operating model for quality assessment, for implementation from 2016/17. This model was underpinned by a set of baseline regulatory requirements, consisting of external reference points that already existed in the higher education landscape. The requirements were designed to ensure that all providers operating in the higher education system are able to deliver a high quality academic experience for students, to protect degree standards, and the student interest more broadly.
11. The baseline regulatory requirements are a core component of the approach to assessing the quality of higher education in England, Northern Ireland and Wales. While a different set of regulatory requirements apply in Scotland (under the Further and Higher Education (Scotland) Act 2005), all four nations agree on the core principles the requirements represent. They also agree that: students are entitled to a high quality academic experience; students' interests should be protected; and degree standards should be comparable across the UK. The baseline will be kept under review to ensure it remains appropriate in response to developments in the different countries of the UK.
12. The baseline requirements are as follows:
 - The frameworks for higher education qualifications, as set out in the UK Quality Code for Higher Education;
 - The Expectations of the UK Quality Code for Higher Education;
 - The relevant code of governance;
 - The providers' relevant obligations under consumer law;
 - The relevant good practice framework for handling complaints and academic appeals;
 - The financial sustainability, management and governance requirements of the relevant funding body, and mission and strategy for higher education provision.

In addition there are some Wales only baseline requirements, as follows:

- Welsh language requirements;
- Alignment with the Credit and Qualifications Framework for Wales;
- Core and common practices within the Quality Code, characteristics statements and subject benchmark statements, where appropriate.

13. A [UK Standing Committee for Quality Assessment](#) (UKSCQA) has been convened, bringing together the four funding bodies with sector and student representative bodies. This committee provides UK-wide consideration of quality assessment arrangements, including common baseline regulatory requirements.

Cross-cutting issues

14. Cross-cutting issues include the:
- Need to preserve the sense of a UK-wide quality system, as far as is possible in a devolved environment with increasingly diverse policy positions;
 - Need to ensure the continued compliance with international quality expectations, in particular in Europe;
 - Essential role of students as partners in the design and operation of quality assessment arrangements;
 - Design and implementation of a single coherent system which integrates the UK funding and regulatory bodies' approach to quality assessment and the English Government's arrangements for the Teaching Excellence and student outcomes Framework (TEF).

The Framework

15. The Framework includes:
- A gateway for entry for institutions wishing to become regulated for the first time, or apply for a Fee and Access Plan;
 - Arrangements for established providers, building on established and tested approaches to data benchmarking and analysis, intelligence gathering (including from students), risk assessment, and assurance;
 - Strengthened arrangements to secure degree standards and their reasonable comparability across the UK, led by the sector representative bodies;
 - Tailored but rapid intervention where necessary;
 - Protection of the international reputation of the UK higher education brand, including through the assurance of transnational education.
16. A representation of the framework is available at Figure 1 (and **Annex A**, for ease of reference). Providers wishing to become regulated need to undergo a Gateway review in order to become regulated for the first time, or apply for a Fee and Access Plan. Once regulated, providers are subject to all aspects of the Framework. The processes are not in any specific order. More information on each aspect is provided below.

Figure 1. Quality Assessment Framework for Wales

Quality Assessment Framework				
Gateway	Arrangements for established providers	Tailored but rapid intervention	Degree Standards and Comparability	International Reputation
<ul style="list-style-type: none"> • Gateway Quality review: Wales 	<ul style="list-style-type: none"> • Risk-based review arrangements • Scrutiny of data • Annual assurance from the governing body • Triennial visits • Working in partnership with students 	<ul style="list-style-type: none"> • HEFCW complaints process • Guidance • HEFCW's Quality Assessment Committee 	<ul style="list-style-type: none"> • Understanding Degree Algorithms • Grade inflation / improvement • UK-wide Degree classification: statement of intent • Institutional statements on degree standards • External examining, professional development and calibration 	<ul style="list-style-type: none"> • UK Standing Committee for Quality Assessment • Transnational oversight

A gateway for entry for institutions wishing to become regulated for the first time, or apply for a Fee and Access Plan

17. From 2017/18, institutions are required to undergo a [Gateway Quality Review: Wales](#) by a body specified by HEFCW, currently the Quality Assurance Agency for Higher Education¹. An institution that successfully completes a gateway review might wish to apply for [specific designation](#), which enables students to access student support for named HE courses, provided they meet other requirements for this process.
18. Normally, four years² after the initial gateway review, the institution can commission a further gateway review. If this review is successful, then the institution is deemed to have met HEFCW's quality assurance requirements prior to applying for a Fee and Access Plan³. If an institution is successful in applying for a Fee and Access Plan then its students on all full-time HE programmes will have access to the full package of undergraduate student support.

¹ See Circular W17/40HE www.hefcw.ac.uk/publications/circulars/circulars_2017.aspx. Any updates to this will be available at www.hefcw.ac.uk/policy_areas/learning_and_teaching/qa_fa_wa.aspx

² If an institution has a previous QAA review, this may meet some of the requirements – further information is available in circular W17/40HE

³ Fee and access plan applicants have to be an institution in Wales, that provides higher education and a charity. Applicants also have to provide information relating to its financial viability and the arrangements for the organisation and management of its financial affairs. www.hefcw.ac.uk/working_with_he_providers/he_wales_act_2015/fee_and_access_plan.aspx

Arrangements for established providers

19. In Wales, regulated institutions are deemed to be established providers. Arrangements for these providers incorporate: risk-based review arrangements; scrutiny of data; annual assurance from the governing body; triennial visits; and monitoring the partnership arrangements between the student body and higher education. Scrutiny may include quality of provision at programme or course level, where appropriate and practicable.

Risk-based review arrangements

20. Regulated institutions are required to commission an external quality assurance review at least every six years.
21. The requirement for external quality assurance review addresses HEFCW's HEFCW's statutory responsibilities to ensure the quality assessment of education provided by and/or on behalf of regulated institutions. It provides the assurance required under the 2015 Act with regards to quality, to enable Fee and Access Plans to be approved, and therefore for regulated institutions to access student support for full-time undergraduate and PGCE courses.
22. The external quality assurance review must comply with the ESG requirements for such reviews. The ESG enable higher education providers to demonstrate quality and increase transparency, helping to build mutual trust and better recognition of their qualifications, programmes and other provision. The ESG are used by institutions and quality assurance agencies in the European Higher Education Area as a reference document for internal and external quality assurance systems in higher education.
23. Further information on the review requirements is available on our [website](#)⁴. Circular W19/05HE sets out the means by which the review judgements inform the assessment of risk.
24. Universities Wales have established a framework arrangement with the [Quality Assurance Agency for Higher Education \(QAA\)](#) to deliver this external quality assurance review. The review has a strong focus on enhancement. Universities Wales have offered other regulated institutions the option of participating in these arrangements.

Scrutiny of data

25. HEFCW scrutinises data, student views and other intelligence, and the information collected through HEFCW's annual accountability processes (including the annual accountability return). Much of this is done via HEFCW's institutional risk review process, as set out within our Procedures for assessing the quality of education (Circular [W19/05HE](#)).

⁴ www.hefcw.ac.uk/policy_areas/learning_and_teaching/qa_fa_wa.aspx

26. The data which HEFCW considers in relation to its regulatory responsibilities includes:
- Over/under-recruitment patterns;
 - Non-progression rates;
 - Non-completion rates;
 - National Student Survey outcomes;
 - Degree outcomes, including differential outcomes for students with different characteristics;
 - Employment outcomes;
 - TEF outcomes, for institutions which have chosen to participate
27. Analysis will also include the identification of trends in data, together with institutions' track records. However, such judgements will not be made solely on the use of data.
28. The use of data in this way will enable issues relating to protected groups under the Equalities Act 2010 to be identified. Our Quality Assessment Committee (QAC) considers this data for regulated institutions and provides advice on issues arising. This includes considering where institutions have achieved outcomes which are above benchmark, and where good practice might be shared. Advice from QAC will inform judgements in HEFCW's institutional risk review (IRR) process and Council decision-making.

Annual assurance from the governing body

29. The governing bodies of regulated institutions are required to provide annual assurance to HEFCW in relation to quality. They will be asked to confirm the following statements annually.
- 1 The governing body has received a report taking account of the external quality assurance review, and an action plan has been put in place and implemented as appropriate, in partnership with the student body.
 - 2 The methodologies used as a basis to improve the student academic experience and student outcomes are, to the best of our knowledge, robust and appropriate.
 - 3
 - a) *For providers with degree awarding powers*: The standards of awards for which we are responsible have been appropriately set and maintained.
 - b) *For providers without degree awarding powers*: The standards of awards for which we are responsible have been appropriately maintained.
 - 4 The governing body has considered a report on the annual dialogue between the institution and the Students' Union or equivalent, scrutinised student survey outcomes and confirmed that action plans had been put in place and implemented, in partnership with the student body.

- 5 The governing body has received a copy of the relationship agreement between the institution and the Students' Union or equivalent, and a copy of the student charter, both of which have been reviewed within the past year.
30. These statements collectively are designed to ensure that the institution maintains an appropriate focus both on enhancement and on working in partnership with the student body. If a governing body is unable to provide this assurance, then this may indicate that the provision is (likely to become) inadequate.⁵ Officers will triangulate these statements as part of the triennial assurance visits (see below), and outcomes will be considered within the IRR process and Fee and Access Planning process.

Triennial assurance visits

31. HEFCW has introduced a quality assurance element into triennial assurance visits to institutions.⁶ This will inform Council institutional visits and other visits and assurance processes. It will also inform our existing institutional risk review process⁷, advised by our QAC, and the subsequent annual risk letter to the provider. It will also inform assessment of annual submissions of fee and access plans. Our engagement with institutions following this analysis will be risk-based and proportionate.
32. The triennial visit involves visiting the institution and holding separate meetings with:
- The Students' Union and representatives;
 - Members of the Governing body;
 - Members of the senior management team, including staff with responsibility for quality.
33. The visit provides an opportunity for the institution to provide information on its enhancement activities, in order to demonstrate how it meets the changing needs of students. HEFCW officers subsequently produce a report, which is provided in draft to the institution to enable them to highlight matters of accuracy. The final report is provided to QAC for advice, and is also provided to Council to inform its engagement with institutions.
34. Officers expect that the institutional governing body will also consider this report.

⁵ Information on this is available in circular [W17/07HE](#) and [Annex A: Quality Assurance Statements for the Governing Bodies of Regulated Institutions](#)

⁶ Further information is available at www.hefcw.ac.uk/documents/policy_areas/learning_and_teaching/Triennial%20Assurance%20visit%20leaflet%20English.pdf

⁷ The process may be reviewed in light of our regulatory role

Working in partnership with students

35. Partnership arrangements between the student body and higher education providers in Wales are well developed. This provides a range of opportunities for students to raise issues relating to quality, including via institutional review, the institution's own processes, the governing body, or directly with HEFCW.
36. We think gathering student views should be the role of the governing body, and that they must demonstrate how they have done this at the point of submitting a Fee and Access Plan application. In Wales, this is achieved through:
- (i) Representation of students on the governing body and relevant institutional committees;
 - (ii) A report on the annual dialogue between the institution and the student body, eg via the annual quality report (AQR). It would be good practice for the student body to define within the document how it perceives quality and the reasonable needs of students⁸;
 - (iii) A requirement for every regulated institution to have a student charter;
 - (iv) Confirmation that the National Student Survey results have been scrutinised and action plans put in place in partnership with the student body;
 - (v) Inclusion of students as peer reviewers in the external review commissioned by the governing body, and through engagement with the student body through the external review;
 - (vi) Engagement with the student body through the HEFCW triennial assurance visits.

In addition, together with England and Northern Ireland, students are:

- (vii) members of the UKSCQA to oversee development of baseline regulatory requirements;
- (viii) able to report complaints about an individual provider for investigation through any concerns mechanism adopted.

Student organisations need to ensure that they represent the diverse student body, in order to ensure that the needs of all types of students are appropriately considered in their engagement with these processes, and with the development of Fee and Access Plans.

Strengthened arrangements to secure degree standards and their reasonable comparability across the UK, led by the sector representative bodies

37. Work in this area is considered by the UKSCQA, which advises on progress and outcomes, and aims to ensure that the value of qualifications across the UK is maintained. This includes attempting to understand grade improvement vs grade inflation. To date work on this area has included:

⁸ HEFCW may request copies of these documents prior to triennial visits

- Universities UK and GuildHE work on [Understanding Degree Algorithms](#);
 - Publication of the [UK Degree Classification: Statement of intent](#);
 - Universities UK and GuildHE work on grade inflation / improvement;
 - Work on essay mills, contract cheating, and plagiarism;
 - Advance HE work on external examining, including information on professional development and calibration.
38. The UK statement of intent expresses a commitment to protecting the value of UK degrees, signed by sector representative groups and endorsed by the UKSCQA. Through this statement institutions commit to:
- Ensure assessments continue to stretch and challenge students;
 - Review and explain how final degree classifications are calculated;
 - Support and strengthen the external examiners system;
 - Review and publish data and analysis on students' degree outcomes.
39. The document confirms that in Wales the statement is secured via the Quality Assessment Framework and elements of the external quality assurance review. Regulated institutions in Wales will publish statements articulating the outcomes of an internal review of degree standards by 2019/20.

Tailored but rapid intervention where necessary

Complaints procedures

40. HEFCW has developed a procedure for [Complaints about institutions \(including concerns about standards and quality\)](#). The process enables anyone who is aware of issues relating to the quality of education as defined under Section 18(2) of the 2015 Act (ie quality which is, or is likely to become, inadequate) to raise these directly with HEFCW.
41. This covers matters relating to standards and student academic experience. The issue must also affect, or have the potential to affect, a group of students rather than an individual. The issue should also normally have been raised through the institution's own procedures, prior to raising a HEFCW complaint.
42. In the first instance, HEFCW officers will undertake whatever work is considered necessary in relation to complaints regarding quality. This may include a preliminary investigation of the issue, if deemed appropriate. Should a full quality investigation be considered necessary, then HEFCW will normally refer the matter to the QAA. The investigation will lead to a report, which will normally be published on HEFCW's website within 30 days of issue.
43. Where institutions think there is reason to believe that the quality of provision is inadequate or likely to become inadequate as identified through their own processes including via complaints, they must treat this as a notifiable event, and inform HEFCW as soon as possible.

Guidance

44. In addition, under the 2015 Act, HEFCW is empowered to issue or approve guidance about matters relevant to improving or maintaining the quality of education provided by (or on behalf of) regulated institutions. This includes guidance on matters HEFCW will consider in determining whether the quality of education is (likely to become) inadequate. HEFCW must consult on such guidance, which must subsequently be taken into account by the governing bodies of regulated institutions.

HEFCW's Quality Assessment Committee

45. HEFCW's Quality Assessment Committee advises HEFCW on matters relating to quality which is (likely to become) inadequate as set out in Circular W19/05HE. This includes advising on guidance prior to consultation, and on issues arising through other processes such as Fee and Access Planning, triennial review, or other engagements with institutions.

Protection of the international reputation of the UK higher education brand, including through the assurance of transnational education

46. This is achieved through the convening of the UKSCQA, which provides UK-wide oversight of the common baseline regulatory requirements.
47. HEFCW will work with the QAA and the sector to ensure that appropriate oversight of transnational provision is maintained, either through overseas visits and/or case studies.

Additional information

48. HEFCW will keep the Quality Assessment Framework under review. This will include taking account of UK-wide developments in relation to quality, where they impact on HEFCW's regulatory role. This will enable evaluation of whether:
- the Framework meets the needs of Wales;
 - any changes are required;
 - there should be an increased focus on continuous improvement;
 - elements of the Framework need to be adapted as a result of changes in other parts of the UK;
 - elements of best practice could be incorporated into the Framework.
49. In addition, HEFCW recognises that the reasonable needs of students will change over time, eg in response to new technologies or forms of provision. This means that the Framework may also need to evolve to take account of these changes.

Annex A

Figure 1. Quality Assessment Framework for Wales

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