

December 2011/36

Policy development

Statement of policy

This report is for information

This is an update of the 2009 publication 'Policy for addressing unsatisfactory quality in institutions' (HEFCE 2009/31). The update is needed following the introduction of new arrangements for reviewing academic standards and quality in higher education institutions, known as institutional review, which came into effect for higher education institutions in September 2011.

Policy for addressing unsatisfactory quality in institutions

2011 update

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To	Heads of HEFCE-funded higher education institutions Heads of HEFCE-funded further education colleges Heads of universities in Northern Ireland
Of interest to those responsible for	Quality assurance
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Executive summary

Purpose

1. This is an update of the 2009 publication 'Policy for addressing unsatisfactory quality in institutions' (HEFCE 2009/31). The update is needed following the introduction of new arrangements for reviewing academic standards and quality in higher education institutions, known as institutional review, which came into effect for higher education institutions in September 2011.

Key points

2. The principles and relevant procedures of the 2009 policy remain broadly in place. This update takes account of the new method of institutional review introduced by the Quality Assurance Agency for Higher Education – in particular its grading system – which will trigger HEFCE's policy for dealing with unsatisfactory quality.
3. This policy update will apply to higher education institutions from 2011-12. For further education colleges (FECs) however, HEFCE 2009/31 remains in force.
4. This policy will be reviewed more comprehensively in the future to take account of the new higher education (HE) environment, including the new system of review of HE in FECs.

Action required

5. No action is required in response to this document.

Introduction

6. This update to 'Policy for addressing unsatisfactory quality in institutions' (HEFCE 2009/31) has been published to reflect the introduction by the Quality Assurance Agency for Higher Education (QAA) of a new method for reviewing academic standards and quality in higher education institutions, known as institutional review.

7. This updated policy seeks only to take account of the new system of grading for the four¹ judgements used within institutional review which will now trigger HEFCE's policy for dealing with unsatisfactory quality. The principles and relevant procedures of the original policy remain in place. Therefore, once the unsatisfactory quality policy has been instigated, the process as set out in HEFCE 2009/31 remains broadly unchanged and should be referred to in the first instance.

8. This update applies only to higher education institutions (HEIs) from the start of academic year 2011-12. This is because, for 2011-12, the current cycle of Integrated Quality and Enhancement Review (IQER) in further education colleges (FECs) remains in place; thus HEFCE 2009/31 remains valid for higher education delivered in FECs.

9. Given the government reforms now under consideration for the funding, regulation and quality assurance of higher education (HE), it has not been appropriate to re-draft this policy in its entirety at the present time; not least because the policy remains valid for FECs for 2011-12. This policy is likely to be reviewed more comprehensively in the future to take account of changes introduced around the following: a more risk-based approach to quality assurance; implementation of a new teaching funding method; and regulatory reforms, for example regarding the conferring of university title and degree-awarding powers.

Background

10. HEFCE has a statutory duty, under the terms of the 1992 Further and Higher Education Act, for ensuring that the quality of education is assessed in the universities and colleges it funds. We contract the QAA to conduct quality assessments on our behalf in both HEIs and FECs.

11. From 2006-07 to 2010-11, the QAA reviewed academic standards and quality in HEIs through institutional audit. In FECs, the QAA will continue to review standards and quality through Integrated Quality and Enhancement Review, with the current cycle ending in summer 2012.

12. HEFCE's policy for addressing unsatisfactory quality in institutions was introduced in 2009 in order to complete the loop in any instances where institutions showed themselves unable to meet quality expectations. Paragraph 37 of HEFCE 2009/31 states that:

'.....Depending on the circumstances, the unsatisfactory quality policy shall be triggered by any of the following:

¹ For 2011-12, three judgements will be in force; for 2012-13, four will apply (see paragraph 16).

- a. If, following an initial judgement of no confidence, an action plan could not be agreed between the QAA and the institution within a reasonable time frame, as judged by the QAA.
 - b. If, following an initial judgement of no confidence, the QAA confirmed to HEFCE that an institution had not made satisfactory progress on implementing the action plan within the specified deadlines. 'Unsatisfactory progress' will be regarded as a failure to address in full, or in significant part, the recommendation(s) in the institutional audit or IQER report, and/or failure to progress the action plan.
 - c. If an institution which had received a judgement of no confidence in a previous institutional audit or IQER received a further judgement of no confidence in the following institutional audit or IQER. Two successive no confidence judgements will be regarded as being of particular concern, especially if the problem(s) identified as the basis for the judgements is/are similar on each occasion.'
13. The policy applies therefore only in exceptional circumstances. It has not been invoked to date. A flow chart of the revised unsatisfactory quality policy that will apply to HEIs from 2011-12 is at Annex A.

Amendment to triggers to invoke the process

14. From September 2011, the QAA introduced a new process for reviewing academic quality and standards in higher education institutions in England and Northern Ireland, known as institutional review, which was to replace the institutional audit method. The introduction of this new system follows a consultation sponsored by HEFCE, the Department for Employment and Learning (Northern Ireland), Universities UK and GuildHE: 'Future arrangements for quality assurance in England and Northern Ireland' (HEFCE 2009/47).
15. Under this new process for HEIs, review teams will be asked to make judgements on the effectiveness with which an institution assures:
- its threshold academic standards
 - the quality of students' learning opportunities
 - from 2012-13, the quality of public information, including that produced for students and applicants
 - enhancement of students' learning opportunities.
16. In the area of academic standards, review teams will judge whether an institution's academic standards 'meet' or 'do not meet' UK threshold academic standards. In the areas relating to the quality and enhancement of student learning opportunities, the review team will make a judgement of whether the provision is to be 'commended', 'meets UK expectations', 'requires improvement to meet UK expectations' or 'does not meet UK expectations'. From 2012-13, a four point judgement will also be made on the quality of public information, including that produced for students and applicants. (For 2011-12, review teams will provide a commentary on the public information, as previously set out in HEFCE 2006/45, Annex F.)

17. The changes needed to the original HEFCE unsatisfactory quality policy arise therefore from the introduction of four areas of judgements and the use of a new grading system. The QAA handbook of institutional review², published in March 2011, sets out the procedures for follow-up activity arising from judgements of 'requires improvement to meet' or 'does not meet', which may lead to the invoking of HEFCE's unsatisfactory quality policy. It states:

'...Where a review team makes a judgement of "requires improvement to meet" or "does not meet" in at least one area of the review, the report will be published and there will then follow a formal programme of follow-up activity to address the recommendations of the review.

If you [the HE provider] receive a "requires improvement" judgement, you will be asked to produce an action plan to address the review findings within one academic term/semester. The QAA expects this to be more detailed than the action plan required for a "meets" judgement since it will need to explain how the identified weaknesses or risks that are germane to the "requires improvement" judgement are to be addressed **within one year** of the publication of the review report.

We [the QAA] will ask you to submit your action plan to your QAA officer, who will plan with you a series of progress reports to be provided over the following year. Both the action plan and the progress reports should be drawn up jointly with student representatives. If reports are received on time and show that progress has been made in dealing with the review findings, QAA will arrange for a peer visit to establish whether the judgement can be changed to "meets". If this is the case, the judgement will be changed, the review signed off, and you will be able to use the QAA logo as mentioned above.

If after one year peers do not feel that sufficient progress has been made in dealing with the review findings, you will be required to take part in the next level of follow-up: that for a "does not meet" judgement.

If you receive a judgement of "does not meet" in any area, or if you do not make sufficient progress in dealing with a "requires improvement" judgement, you will be asked to provide a detailed improvement plan to deal with the weaknesses or risks identified in the review that are germane to the "does not meet" or "requires improvement" judgement. In addition the improvement plan should include plans to review and strengthen institutional quality assurance structures, processes and policies to limit the risk of such a judgement being delivered in future.

We will ask you to submit your development plan to your QAA officer who will plan a series of progress reports to be provided over the following year. Both the action plan and the progress reports should be drawn up jointly with student representatives. If reports are received on time and show that progress has been made in dealing with the review findings, QAA will arrange for a second Institutional Review to take place. If the second review returns "commended" or "meets" judgements in all areas, the judgement(s) will be changed, the review signed off, and you will be able to use the QAA logo as mentioned above.

² Paragraphs 59-65 of

www.qaa.ac.uk/Publications/InformationAndGuidance/Documents/IR_Handbook_March11.pdf

If at the second review any judgement of less than “meets” is achieved, or if insufficient progress is made to make holding a second review worthwhile, HEFCE’s policy for dealing with unsatisfactory quality will be invoked. This policy sets out a range of possible actions that might be taken, including, as a last resort, to withdraw funding from an institution. In the case of institutions not in receipt of public funding, QAA will use its discretion to decide whether the matter is of sufficient importance to warrant a further separate focused activity, with a published report.’

18. There is an important difference between the ‘repeated failure’ triggers under institutional audit and the new institutional review. Under the original unsatisfactory quality policy, only one category of repeated failure triggers the policy. That is to say, an institution which had received two successive no confidence judgements in audit, typically six years apart, would have triggered the unsatisfactory quality policy. (See paragraph 12c.)

19. Under the new institutional review, two categories of ‘repeated failure’ trigger the actions outlined in the unsatisfactory quality policy:

- a. An HEI who receives a ‘does not meet’ judgement will have to agree a detailed improvement plan and undergo a follow-up institutional review. If insufficient progress is made against the plan to warrant a follow-up review or, if in the follow-up review a judgement of less than ‘meets’ is received, the unsatisfactory quality policy would be invoked.
- b. An HEI that receives a ‘requires improvement’ judgement will have to agree an action plan; upon insufficient progress in dealing with this ‘requires improvement’ judgement, the same procedures will apply as with a ‘does not meet judgement’ as set out above – an improvement plan and as appropriate a follow-up institutional review, which, if resulting in less than ‘meets’ judgement, triggers the unsatisfactory quality policy.

20. As with institutional audit, if an institution receives a failing judgement at a subsequent institutional review, approximately six years later, this will also result in the unsatisfactory quality policy being triggered. These changes retain the spirit of the original unsatisfactory quality policy while reflecting the changed categories of judgement for institutional review.

Steps taken when the unsatisfactory quality policy is triggered

21. When HEFCE’s policy for dealing with unsatisfactory quality is triggered, the process as set out in HEFCE 2009/31 will be followed. (In summary, the process commences with a request to the QAA to carry out a preliminary investigation using the QAA’s updated process for raising concerns about quality and standards in HE³, and concludes with a final decision on action to take by the HEFCE Board.)

22. As now, the QAA will use its discretion on a case-by-case basis to identify appropriate follow-up steps while ensuring that quality and standards are safeguarded.

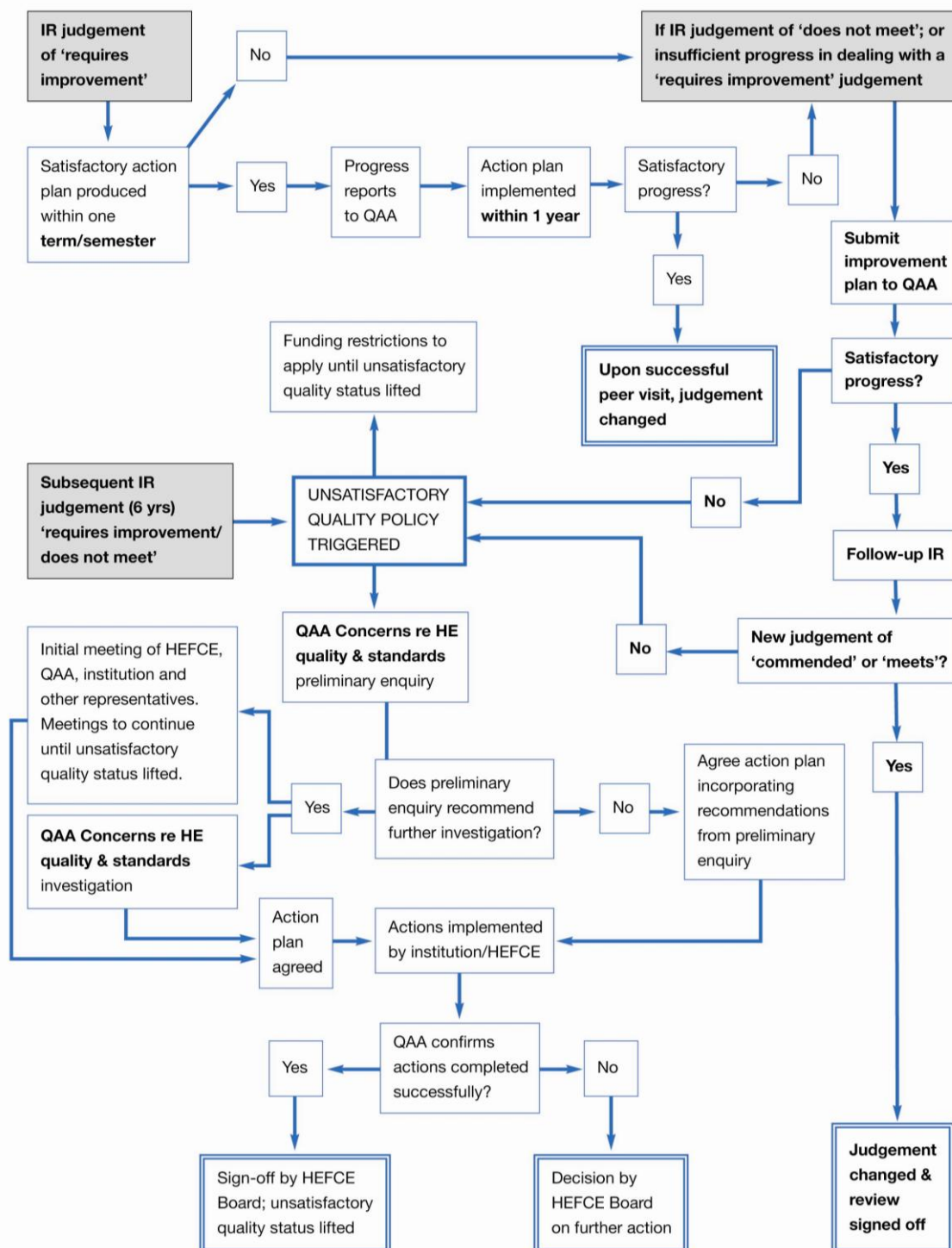
³ For further information see www.qaa.ac.uk/Complaints/concerns/Pages/default.aspx

Annex A

Figure 1

Flow chart of revised unsatisfactory quality policy that will apply to HEIs from 2011-12

Bold indicates changes to the original 2009 policy. Shaded boxes indicate institutional review (IR) judgements that may trigger the unsatisfactory quality policy (UQP).



List of abbreviations

FEC	Further education college
HE	Higher education
HEFCE	Higher Education Funding Council for England
HEI	Higher education institution
IQER	Integrated Quality and Enhancement Review
IR	Institutional review
QA	Quality assurance
QAA	Quality Assurance Agency for Higher Education