A risk-based approach to quality assurance: Outcomes of consultation

Annex A

Detailed analysis of responses

Background

1.   This section outlines the key questions and subsequent sector responses to the consultation 'A risk-based approach to quality assurance: Consultation' (HEFCE 2012/11). This was an open consultation and we welcomed views from anyone with an interest in quality assurance and quality enhancement within higher education (HE). We particularly encouraged responses from students and student unions, but did not receive a great number.

2.   In our main outcomes document, we have also taken account of points made at the consultation events, which included discussions about all aspects of the proposals. Students were reasonably well represented at the consultation events. We were also able to support the Student Sounding Board discussion of this matter held by the Quality Assurance Agency for Higher Education (QAA). Discussions at the events were often wide-ranging, always challenging and stimulating, and often broader in scope than the formal consultation covered. We have not therefore tried to include all of the viewpoints raised in consultation events in our formal analysis of responses. However, broader perspectives have been important in informing our final decisions. Notes from the events are available at www.hefce.ac.uk/news/events/2012/name,72837,en.html.

3.   The agreed outcomes of the consultation take full account of the arguments put forward at the consultation events and the overall thrust of the written responses. Of course, some conflicting views emerged from the consultation process and we have done all that we can to balance the weight of the arguments presented. The consultation responses included one response from a Northern Ireland institution, which is included in the total of 130, but is not included elsewhere in our analysis.

Responses and Analysis

4.   The overall response numbers were as follows:

<u>Table 1. Overall response numbers</u>

	Total	Percentage (to nearest whole)
Higher education institution (HEI) (this included one response from an HEI in Northern Ireland which has not been included in our analysis)	83	64%
Further education college (FEC)	11	8 %
Current student	0	0 %
Other provider of HE	3	2%
An individual (not currently a student)	4	3%
Student union or other student organisation	6	5%
Other (including sector agencies, sector representative bodies, specialist organisations, mission groups, professional, statutory and regulatory bodies and trade unions. This included a response from the QAA).	23	18%
Total	**130**	**100 %**

5.   For Questions 2a, 3a, 5c and 6a, in addition to a longer qualitative response, respondents were asked to gauge their agreement with the principles on a five-point scale, ranging from 'Strongly agree' to 'Strongly disagree'. The total numbers of these responses are set out in Tables 2 to 5.

Question 1a.

Please comment on the extent to which you consider that the agreed quality assurance system and HEBRG <u>principles</u>, set out above, provide an appropriate basis for a more risk-based approach to quality assurance.

Question 1b.

Are there any other principles that apply?

6.   The consultation set out a number of principles which we suggested should underpin a more risk-based approach to quality assurance. First, we reiterated that the revised approach would adhere to the principles and objectives which have applied to the

quality assurance system for HE in England and Northern Ireland from 2011-2012[1]. Second, we set out how the revised approach would adhere to the Principles for Better Regulation of Higher Education in the UK, developed in 2011 by the Higher Education Better Regulation Group (HEBRG)[2]. Finally we proposed some tenets which would be helpful:

> a.   A more risk-based approach should be based on Institutional Review, as introduced in 2011-12.

> b.   Relevant providers will be subject to Institutional Review, but its nature, frequency and possible intensity will vary according to the provider's quality assurance history.

> c.   There should be a maximum period of time, recommended to be no more than 10 years, between Institutional Reviews.

> d.   We should retain the key feature of peer review and judgement as a central part of the process.

7.   Overall, 76 per cent of respondents broadly agreed with the principles proposed. Among the remaining 24 per cent, 2 per cent did not agree, 16 per cent expressed some reservations and 7 per cent did not express an opinion. However, it was clear from responses that the majority of respondents focused on the HEBRG principles, and did not consider the principles and objectives which have applied to the quality assurance system for HE in England and Northern Ireland from 2011-12. Although a number of additional principles were suggested, not all of these would actually be 'new'. Recognising this, the following helpful suggestions were made:

> a.   Reducing burden: Respondents were supportive of the aim of reducing burden for institutions (especially those with a proven track record for quality) and would like this intention to be made more explicit in the principles, alongside further assurances that this can be achieved. Respondents commented that burden should be reduced as far as possible without reducing public confidence in standards.

> b.   Inclusion of all higher education institution (HEI) types and fair treatment: Respondents (including both institutions and bodies) were strongly supportive of the view that all HE providers, including private providers, should be included in the same system for quality assurance and that all providers should be expected to meet the same threshold for quality and standards. There was a feeling that this should be more explicit.

> c.   Proportionality and understanding of institution type: A wide cross-section of respondents commented on this issue, suggesting in particular that external quality assurance engagement should be proportionate to the risks associated with different providers.

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[1] For further information, see: 'Future arrangements for quality assurance in England and Northern Ireland' (HEFCE 2010/17) (www.hefce.ac.uk/pubs/year/2010/201017/)

[2] http://www.universitiesuk.ac.uk/AboutUs/AssociatedOrganisations/Pages/HEBRG.aspx

d.   Quality enhancement: Respondents called for this to be given even greater prominence, and for the importance of innovation in curriculum development to be maintained.

e.   Managing and defining risk: There were some comments that the proposals did not adequately define risk and that criteria and benchmarks against which levels of risk can be assessed should be included. For other respondents, the consultation raised wider issues around HE regulation and how institutional risk is monitored and addressed. This issue is further considered under Question 8.

f.   Student interest: A number of student unions responded that the principles were not explicit on the broader benefits of engaging students in quality assurance.

g.   Peer review: The importance of retaining peer review as a fundamental principle for any process was explicitly mentioned by a minority of respondents.

h.   Other priorities: The need to maintain both the global reputation of UK HE and the independence of the QAA was regularly highlighted.

HEFCE response

8.   We welcome the broad support for the principles which underpin the more risk-based approach to quality assurance. We will seek to ensure that the broader principles for quality and standards continue to put these at the core of any new developments, including in HEFCE's role to protect and promote the collective student interest. The outcomes from the consultation draw particularly on comments relating to burden, proportionality, an inclusive approach, and enhancement.

9.   We address issues relating to the definition and management of risk under Question 8. We also note continued work with HEBRG under Question 6.

Question 2a.

In the pursuit of a more risk-based approach to quality assurance, the consultation proposes that the <u>extent, nature and frequency</u> of external quality assurance should vary according to the track record and scope of the provision of the higher education provider. Do you agree?

Question 2b.

Please explain the reasons for your answer

<u>Table 2. Responses to Question 2a</u>

Respondent Type	Response	Number	Total	Percentage (to nearest whole)
HEI	Strongly agree	20	27	21%
FEC	Strongly agree	2		
An individual (not currently a student)	Strongly agree	2		
Other	Strongly agree	3		
HEI	Agree	44	67	54%
FEC	Agree	7		
Other provider of HE	Agree	2		
Student union or other student organisation	Agree	3		
Other	Agree	11		
HEI	Neither agree or disagree	6	13	10%
FEC	Neither agree or disagree	1		
Student union or other student organisation	Neither agree or disagree	1		
Other	Neither agree or disagree	5		

Respondent Type	Response	Number	Total	Percentage (to nearest whole)
HEI	Disagree	8	12	10%
FEC	Disagree	1		
Other provider of HE	Disagree	1		
An individual (not currently a student)	Disagree	1		
Student union or other student organisation	Disagree	1		
HEI	Strongly disagree	4	7	6%
An individual (not currently a student)	Strongly disagree	1		
Student union or other student organisation	Strongly disagree	1		
Other	Strongly disagree	1		
TOTAL			126	100%

Note: Where totals are less than 130, this indicates that some respondents did not answer this question, or that responses from Northern Ireland have not been included. This applies to all tables.

10.   The consultation document set out our proposal to vary the frequency, nature and intensity of review based on an institution's track record of assuring quality and standards, and the complexity of its provision.

11.   Seventy-five per cent of respondents were broadly supportive of the proposal that external quality assurance review should be tailored more specifically to a HE provider's circumstances. However, views varied on how this might be implemented in terms of the frequency, nature and intensity of reviews, and whether a provider's track record should be considered as an indicator of risk. Although this was specifically set out as a fundamental principle of a more risk-based approach, 12 per cent drew attention to the importance of the universal coverage of the external quality assurance review. A clear theme to emerge from the consultation was support for greater transparency in an amended review process. Just fewer than 10 per cent urged clarity on how the review might be tailored through the use of clear and transparent criteria. A handful of responses stressed that variation in review already exists in the current system (although some queried whether it was really less burdensome). Seven respondents queried whether track record was sufficient as an indicator of the future management of quality and standards, commenting that longevity and track record are not necessarily good

predictors of future performance. One university called for the evidence base for track record to be widened to include the outcomes of HEFCE institutional risk monitoring.

12. A significant minority of respondents – over one-fifth – were opposed to the frequency of a provider's review being varied, with most calling for the existing interval of six years to be retained.

13. In the consultation, we proposed two different routes through the quality assurance system which would vary in nature, frequency and intensity. The route by which an institution would be reviewed would be determined by its track record in external review: institutions with a long track record ('Route B') would be reviewed less frequently than those with a shorter record ('Route A'). However, many respondents to the consultation expressed concern about the 'two-route' approach, despite reassurances that the routes would not be indicators of quality. In response to these views, we are not recommending that the QAA use routes when deciding on the timing of reviews.

14. Approximately 10 per cent of respondents commented negatively on the two-route proposal. Eight further education colleges (FECs) expressed a particular concern that the proposals, if implemented, could be incorrectly perceived as suggesting that FE colleges were subject to more frequent review because they presented a higher risk to maintaining quality and standards. One organisation drew attention to the fact that until 2010, 'Route B' was the UCAS name for the application process for art and design courses. This process has only just been phased out and use of the term could cause confusion in the sector.

15. On the proposals for varying the intensity of a provider's review, approximately 6 per cent of respondents questioned how this could be achieved in a way which was meaningful. There was a concern that fewer or shorter meetings would not result in an effective reduction in intensity while the existing documentation requirements remained.

16. While three respondents indicated that enhancement would still be possible under the proposals, a greater number raised concerns about how good practice could be shared successfully across the sector, especially if reviews took place less frequently.

17. Many respondents commented on the interplay between the three factors that we proposed would vary (frequency, nature and intensity): for example, the need to ensure that any reduction in burden from less frequent reviews should be not be replaced by more onerous mid-cycle reviews.

18. In looking at alternative models, three respondents drew attention to the Welsh model, with particular reference to the varied frequency in the scheduling of reviews, based on grading.

19. Eight respondents urged that reviews for degree-awarding powers should be included as one of the two reviews required to demonstrate a provider's track record, on the basis of the robust and demanding institution-wide nature of these reviews. One respondent called for three external institution-wide reviews to be required for Route B.

> HEFCE response
>
> 20.   As set out in the consultation, we will continue to operate a universal system of quality assurance and ask the QAA to review all universities and colleges. However, providers' engagement with the quality assurance system will now vary in frequency, nature and intensity, depending on their track record on quality assurance and the profile of their provision. We recognise that many respondents expressed concerns about the two-route approach despite reassurances given in the consultation document that neither route would be regarded as a direct indicator of quality.
>
> 21.   In response to the desirability of tailoring reviews to the individual circumstances of providers, HEFCE will ask the QAA to publish a single rolling timetable which sets out a provisional schedule for the following six years showing when the reviews of all institutions with access to HEFCE funding are next due to take place. In order to ensure transparency, this timetable should be published on the QAA web-site and be updated regularly, and as frequently, as appropriate. We consider that this will ensure transparency and clarity, and protect the reputation of English HE overseas.
>
> 22.   In particular, we have listened to the concerns expressed by FECs. Without the introduction of separate routes, there is no longer a need to offer FECs an option to 'fast-track' from one route to the other.
>
> 23.   We remain of the view – as did many respondents – that a track record consisting of multiple external institution-wide reviews is an important indicator of an institution's ability to assure the quality and standards of its HE. For this reason, track record will remain as one of the criteria used to determine the interval between reviews, but no labels will pertain. We have considered in detail below how the frequency, nature and intensity of review will be adjusted, and we respond accordingly under each question.

Question 3a.

Do you consider that establishing within Institutional Review a core review process and additional modules for particular types of provision (for example on elements of collaborative provision) would help with achieving the risk-based approach to quality assurance?

Question 3b.

Please explain the reasons for your answer

Table 3. Responses to Question 3a

Respondent Type	Response	Number	Total	Percentage (to nearest whole)
FEC	Strongly agree	3	22	18%
An individual (not currently a student)	Strongly agree	2		
Student union or other student organisation	Strongly agree	3		
Other	Strongly agree	1		
HEI	Agree	46	65	52%
FEC	Agree	4		
Other provider of HE	Agree	2		
An individual (not currently a student)	Agree	1		
Student union or other student organisation	Agree	3		
Other	Agree	9		
HEI	Neither agree or disagree	18	32	25%
FEC	Neither agree or disagree	3		
An individual (not currently a student)	Neither agree or disagree	1		
Other	Neither agree or disagree	10		
HEI	Disagree	3	5	4%
FEC	Disagree	1		
Other provider of HE	Disagree	1		
HEI	Strongly disagree	2	2	2%
TOTAL			126	101%

See note to table 2 above. Note also that where the total of percentages is above 100 per cent, this is due to the rounding-up of totals.

24.   The consultation document suggested that Institutional Review might be revised to incorporate a 'core and module' approach, so that review could be more tailored to an institution's provision through additional modules focusing on particular elements of provision that may be riskier, such as collaborative provision.

25.   Although there was broad agreement in numerical terms, the large majority of respondents who chose to 'agree' expressed caveats.

26.   Clear support was given to the proposal that the whole of an institution's provision would be covered by one review, acknowledging that while this might increase the length of the review, it would reduce the burden of having multiple reviews. Similarly, at least 30 per cent responded favourably on the basis that the core and module approach would enable reviews to be more tailored to institutional circumstances, or would allow the QAA more flexibility in designing its reviews to recognise the different approaches, provision or priorities of institutions, with an opportunity to reduce administrative demands.

27.   Three respondents expressed the view that quality assurance should take a holistic approach which recognises the full student journey and experience. One HEI explicitly noted that the potential, through a modular approach, 'to refocus attention onto new areas that align more closely with student interests is a positive step forward.'

28.   Conversely, some respondents thought that the proposal would not be significantly different from the flexibility the QAA has under the current review method to design its reviews to suit specific institutions (for example by changing the size of its review team). Some were worried about additional modules creating duplication, overlap and potentially extra 'burden'. Often these respondents felt there was little benefit in designing new modules. One respondent stated: 'it is difficult to see how you could split flexible and distance learning, or work-based collaborative arrangements, from the delivery of standard courses which also use these learning and teaching methods'.

29.   One sector body called for an approach which would tailor 'the process of review more closely to the extent and nature of provision at any one institution, and achieve a more risk-based approach through that means [...] [T]he length of the time allowed for the review and the number of reviewers might be adjusted accordingly.'

30.   Four HEIs, all of which 'agreed' or 'strongly agreed' with the proposals, suggested that the core and module approach could be used to allow institutions with a strong track record to have less intervention more generally; the suggestion was that these institutions would have the core review only, with modules being used for those with a shorter track record or to examine areas of concern.

31.   Approximately 20 per cent of respondents specifically requested further information about the operational detail. Many respondents also queried how the modules would be selected. Twelve respondents specifically noted that the selection process for the modules would need to be transparent. These respondents cited the lack of transparency in the current selection process for the review of collaborative and overseas provision.

32.   Although some respondents agreed with the approach of focusing on particular areas in review, they felt it was not clear from the consultation proposals what aspects other than collaborative provision could be reviewed as modules, as the core needed to be sufficiently broad and inclusive. A related point, made by 12 respondents, was that

retaining some sort of core review was important for comparability: one of these highlighted the importance of comparability across the devolved nations, while the others focused on comparability of review across institutions.

33.   A number of respondents commented that collaborative provision and distance learning are often embedded throughout institutions and should not be considered separately. Some felt that there could be a disproportionate burden if institutions with only a small number of courses with collaborative provision were subject to the same level of review as those with a large amount of collaborative provision; conversely, others felt that this would be the correct approach, as quality might actually be more at risk in institutions with a small amount of provision, where systems may not be in place to manage it effectively.

34.   Similarly, given that collaborative provision takes many forms and can be viewed from multiple perspectives, it was felt that the resulting 'module' might be overly complex.

35.   Respondents also cast doubt on the modular approach, given the risk that it might result in compartmentalising quality assurance and enhancement activities. A number of institutions also indicated that the creation of special modules might deter providers from activities which were regarded as 'higher risk', and from taking forward innovative partnerships.

36.   As an alternative to a core and module approach, two large sector bodies made similar suggestions about how the review process itself could be more risk-based, suggesting that institutional review could focus on major changes or enhancements rather than every core element being reviewed at each review. Greater use could then be made of the self-evaluation document and process, and the review process should be able to identify areas of activity where there have not been major changes, where the institution has had positive results in previous institutional reviews and where the institution has reviewed the activity as part of its self-evaluation process. It was suggested that this assessment should provide enough evidence that these areas would not need to be examined in detail.

37.   The following points were raised by fewer than five respondents:

a.   The term 'module' is not helpful because this is used in credit frameworks.

b.   For modules to be meaningful, a minimum number of reviews through a specific module would have to be made across the sector within a prescribed period of time.

c.   If reviews are to be made less intense, it is not clear how there would be a sufficient core.

d.   How much work would be involved in one module – for example, would it be equivalent to a day of institutional review?

38.   Rather than asking the QAA to refine its review methods through the establishment of a core and module approach (with modules for particular types of provision that carry greater risks), we will ask the QAA to cease undertaking separate reviews of collaborative provision and to work towards an integrated review method for all providers of HE which takes sufficient account of the context of the provider, including whether or not it has degree awarding powers and the types of partnerships it has. We will ask the QAA to take an approach to review that allows the review team to investigate all types of provision in a holistic and consistent way, meaning that there will be no separate reviews of different types of provision at a single institution. We will ask the QAA to tailor the review according to the institution's provision, varying the number of days of the review visit and number of reviewers as appropriate. This will reduce the time that an institution is in 'review mode' overall, and will lead to a more bespoke review. We will also ask the QAA to be more explicit, at the preparatory meeting with the institution, about how it will tailor review to the provider, and take greater account of self-evaluations. We expect that where the QAA is confident about the track record of the provider, steps will be taken to reduce further the intensity of review.

39.   *Collaborative provision*: Responses to the consultation and discussions at the consultation events showing strong support for a more individually tailored review, have led HEFCE to make the following broad recommendations on the review of collaborative provision. We will ask the QAA to consider carefully how it might tailor the review of an institution's collaborative provision to reflect its circumstances more closely, ensuring burden is reduced. In a reformed approach to the auditing of collaborative provision, we expect that any institution which undergoes review, but whose awards are validated by another institution, will not be asked to participate to any significant extent in the review of collaborative provision at their validating partner. This would mean that the QAA gives particular attention to the validated provision of partners who themselves are not subject to QAA review arrangements, including those overseas. It is likely that further development of the review method will be required in the light of the outcomes of the QAA's consultation on the UK HE Quality Code's chapter on collaborative arrangements, and that it may not be possible to implement this element of the more risk-based approach to quality assurance for the start of 2013-14. We set out our recommendations in full in the main report.

Question 4a.

Please indicate, for providers with a longer track record, on Route B, what should be the interval between external QAA institutional reviews, ranging from six to 10 years.

Question 4b.

Please explain the reasons for your answer.

40.   In the consultation we asked respondents to indicate what the interval between reviews, ranging from six to 10 years, should be for providers with a longer track record.

Increasing to seven or eight years

41.   Around a third of responses indicated some support for extending the interval to a maximum of up to eight years, although the vast majority of these were supportive of a minimal extension to seven years. Respondents indicated that the proposed annual monitoring process, existing professional, statutory and regulatory body (PSRB) activity and follow-up from previous QAA reviews provided justification for less frequent reviews. Those in favour of stretching the interval emphasised that such a development should not be compensated for by increasing the burden of mid-cycle review or lead to 'a more onerous reporting regime for HEIs'.

Extending to a maximum of 10 years

42.   Seven per cent of respondents (10 respondents, including eight HEIs, one sector mission group and one cross-sector group) supported the extension of the interval to 10 years. Support came particularly from a small number of Russell Group and small and specialist providers. Similar points were made to those above – in particular about a longer interval not resulting in more burden through additional data monitoring or more onerous mid-cycle review. Where providers were strongly in favour of extending the interval, the reasons given included recognising the strength of the record of some providers, and alignment with international comparator institutions, particularly those in the United States. A further argument given for extending the cycle was that it could encourage providers to be more innovative and less risk-averse in the knowledge that a QAA external review was not imminent.

Retaining the current six-year cycle

43.   Just over 50 per cent of respondents were opposed to extending the existing interval. This included cross-sector support from different organisations, institutions (including a number of Russell Group members) and most notably student unions. Reasons were varied, but included recognition that Institutional Review, in its current form, is not overly burdensome. Many respondents commented favourably on the opportunities that the new review method offered in enabling institutions to derive benefit from the preparation for external review. A handful of respondents also stated that as Institutional Review had only recently been introduced it should be given time to become more widely appreciated so that it could become embedded within the sector before further reform is undertaken.

44.   Ten respondents to the consultation explicitly indicated that less frequent reviews would result in a diminished role for students in external quality assurance. Respondents noted that the 'student voice' is most powerful in the period leading up to review, when student unions draft their student written submission. Students also benefit from the opportunities for engagement offered by a scheduled review over and above the normal arrangements for engagement in internal quality assurance processes.

45.   The consultation listed a number of ways in which an extended cycle could reduce student, public and stakeholder confidence in English HE and negatively affect its reputation overseas. These were echoed in responses.

a.　Almost 20 per cent echoed concerns about proposed change being out of step with the European Association for Quality Assurance in Higher Education deliberations.

b.　Slightly smaller numbers voiced concerns about the inability to make meaningful comparisons with providers reviewed on different timescales in the rest of the UK.

c.　Ten per cent indicated concerns about a longer interval potentially resulting in the UK Border Agency seeking to implement a more onerous review regime of their own, because of perceptions that a longer interval between QAA external reviews might not be reliable for their own purposes.

d.　A concern expressed by a handful of respondents, which was not mentioned in the consultation document, was that some European and international accreditation bodies consider the outcomes of QAA reviews in their own deliberations, and a longer duration between reviews may negatively affect this process.

46.　Over 15 per cent of respondents indicated that a longer interval might not be sufficient to respond to significant institutional change, including changes in senior leadership, which might put standards and the student experience at increased risk. Over 10 per cent of respondents indicated that lengthening the interval period could potentially mean that several full cohorts of full-time undergraduates would pass through an institution between reviews, without any external assessment of quality.

47.　Concerns were also frequently expressed that a longer interval would not sufficiently incentivise or recognise enhancement. Respondents noted that the current arrangements encouraged continuous improvement and that it would be a risk if this characteristic was lost. The current arrangements were considered to allow an appropriate time for institutions to develop and refine approaches, with a sufficient period between reviews for experimenting and embedding.

48.　A number of respondents did draw attention to the fact that, due to the evolution of different review methods over recent years, most institutions had been reviewed every four to five years, despite the formal existence currently of a six-year cycle. They suggested that, rather than extending the frequency, effort should be made to ensure that any agreed interval is adhered to.

49.　A further comment made was that many PSRBs, both within the UK and overseas, rely upon the outcomes of the QAA review process to inform their own judgements for accreditation or statutory purposes. An unintended consequence of extending the interval between QAA reviews might be that PSRBs feel obliged to consider increasing the rigour of their investigations to provide more timely assurance for their own requirements.

Shortening the current cycle

50.　Four respondents to this question called for the existing interval to be shortened rather than extended.

51.   A clear majority of respondents to the consultation indicated that the maximum period between reviews for any provider should range from six to seven years, with just over 50 per cent indicating a preference for six years. We will now ask that the QAA reviews providers with a sufficient track record of assuring the quality and standards of their provision every six years. We believe it is appropriate to recognise the majority view and the reasons given for it. A true six-year interval will:

- Enable HEFCE to continue to meet its statutory duty for ensuring the assessment of the quality of HE by providing for the maintenance of quality and standards, with an appropriate focus on enhancement, through regular and robust external review.

- Sufficiently balance the needs of students with the desire of providers to have proportionate QAA engagement. HE providers and representative bodies were in agreement with student representatives that the needs of students should be a key factor in determining the frequency of reviews.

- Ensure that sufficient reviews are undertaken in order to highlight good practice and contribute to enhancement throughout the sector.

- Enable continued comparability with other UK nations, essential for the recognition and reputation of HE among students, the public and other stakeholders, including internationally.

52.   However, we recognise that retaining a six-year interval must result in adjustments being made elsewhere to ensure an appropriate reduction in administrative load. In recognition of the retention of a shorter cycle, we are asking the QAA to remove the requirement for any provider to undergo mid-cycle review. We will ensure that the maximum period between reviews for those with a longer track record of assuring quality is actually six years – and will ask the QAA to ensure that it does not schedule any reviews for a shorter cycle in any transition period between review methods.

53.   We will expect that an institution will have undergone two external institution-wide reviews (with no outstanding actions) in order to be reviewed every six years.

54.   In terms of whether a review undertaken as part of a decision to grant degree-awarding powers (of any form) will be considered as one of the two external institution-wide reviews required for review at six-yearly intervals, we will ask the QAA to use its discretion to decide whether such processes are sufficiently robust, rigorous and in-depth.

55.   We respond below, after Question 5, concerning the criteria for those who will be reviewed on this basis.

Question 5a.

Please indicate, for providers with a shorter track record, on Route A, what should be the interval between external QAA institutional reviews. Bearing in mind the need for there to be a relationship between the review intervals of the two routes, do you have a view about the minimum or maximum interval between reviews on Route A?

Question 5b.

Please explain the reasons for your answer.

56. We proposed in the consultation document that institutions with a shorter track record should be reviewed more frequently than those with a longer track record, and asked what this shorter interval between reviews should be. This interval should bear a sensible relationship with the length for Route B.

Introducing an interval of less than six years

57. The highest proportion, 40 per cent, of those who responded to this question identified four years as a suitable interval for providers who would be placed on Route A. Of these 50 respondents, six were from FECs. It was considered by many that this interval would allow for sufficient scrutiny of how an institution had managed at least two graduating cohorts from three-year degree programmes through to employment. There was a general concern to ensure that the interval recognises that 'quality takes time' – specifically to build-up institutional experience through repetition, review and revision of annual procedures and systems, and to gather evidence in order to drive enhancement. A much smaller proportion of respondents (12 per cent) called for the interval for providers on Route A to be three years, on the basis that such a time span would allow institutions to move quickly from Route A to B.

58. A handful of respondents suggested that the interval should be 'half of that for Route B'.

Opposition to distinguishing intervals for the two routes

59. Over 10 per cent of respondents (15, including two FECs) called for the interval for Route A to be retained at six years, with a handful stating that the current interval was deemed appropriate for guaranteeing standards and quality, to ensure consistency and comparability across the board.

60. Approximately 10 per cent of respondents reiterated opposition to the two-route proposal, stating that the public perception of the two routes might be harmful to some institutions, and that there was a risk of the distinction between Route A and Route B being interpreted as applying one system to universities and one to colleges.

61. The HEFCE response is given below, after consideration of Question 5c.

Question 5c.

Given the evolution of the quality assurance system, most further education colleges with higher education provision will be reviewed according to Route A initially. Should these providers have the option to undertake an early review during 2013-15 so that they may be able to transfer more quickly to Route B?

Table 4. Responses to Question 5c

Respondent Type	Response	Number	Total	Percentage (to nearest whole)
HEI	Strongly agree	9	18	15%
FEC	Strongly agree	6		
Student union or other student organisation	Strongly agree	1		
Other – please specify in box below	Strongly agree	2		
HEI	Agree	25	39	32%
FEC	Agree	3		
Other provider of HE	Agree	2		
An individual (not currently a student)	Agree	1		
Student union or other student organisation	Agree	1		
Other – please specify in box below	Agree	7		
HEI	Neither agree or disagree	23	38	31%
FEC	Neither agree or disagree	2		
Other provider of HE	Neither agree or disagree	1		
An individual (not currently a student)	Neither agree or disagree	3		
Student union or other student organisation	Neither agree or disagree	2		
Other – please specify in box below	Neither agree or disagree	7		
HEI	Disagree	17	22	18%
Student union or other student organisation	Disagree	1		
Other – please specify in box below	Disagree	4		
HEI	Strongly disagree	6	7	6%

Student union or other student organisation	Strongly disagree	1		
TOTAL			124	102%

See note to table 2 above. Note also that where the total of percentages is above 100 per cent, this is due to the rounding-up of totals.

62. The majority of respondents did not support the proposal to offer FECs the possibility of a fast track to Route B. However, this lack of support was predominantly the view of student unions, and HE providers and their representative bodies.

63. Arguments given against the proposal included:

a. It would further risk subdividing the sector, between FECs that could dedicate resource to preparing for an earlier review and those that could not.

b. Institutional Review and Institutional Quality and Enhancement Review are not equivalent as types of institution-wide review.

c. A fast-track procedure would not enable the evaluation of quality and standards over a sufficient length of time to understand the experience of student cohorts across different modes of study.

d. The fast-track proposal would risk placing excessive burden upon the QAA.

General issues related to the two route proposal

64. A number of respondents indicated that the review process for granting degree-awarding powers should be capable of substituting for one of the two eligible reviews for less frequent QAA external reviews, given that it is a rigorous and detailed process covering a wider range of issues than review and involving the analysis of primary evidence.

65. Almost 10 per cent called for a more flexible approach to be taken, rather than the use of routes, arguing that the decision on the interval between reviews should be made after consultation with individual institutions, based on a number of factors, not simply on the narrow indicator of track record.

HEFCE response

66. As proposed in the consultation document, an institution's track record will be the key determinant of this more frequent review, but there will also need to be other criteria. We are asking the QAA to ensure that an institution's next review will take place within four years if one of the following applies:

- it has not yet undergone two successful external institution-wide-reviews

- it has had an investigation under the QAA concerns scheme upheld against it since its last review

- it has undergone significant material changes such as takeover, merger or

expansion of activities, either beyond those reported when degree-awarding powers were originally granted or since the last review[3].

We have developed these additional criteria in place of additional triggers for investigation between scheduled reviews as discussed under questions 7 and 8.

67.   Where a four-year interval follows an upheld concerns scheme investigation or a significant material change, we will ask the QAA to ensure that the subsequent review normally takes place four years from the published date of the scheme outcome or change occurring, **or** when the next review has already been scheduled, whichever occurs first.

68.   A QAA review at a four-yearly interval of a provider which has recently undergone significant material change may require HEFCE to exchange relevant information to with the QAA. In such circumstances, once the provider has undergone a successful review, it would normally next be reviewed after an interval of six years. We believe that the successful review of a provider in such circumstances will safeguard the reputation of its provision, as the provider will have been judged capable of assuring academic quality and standards.

69.   Other issues will be dealt with through the QAA concerns scheme. For example, if one or more PSRBs report concerns about systemic issues in one part of an institution's provision, which might indicate wider problems in its management of quality and standards, the PSRB is able to ask the QAA to investigate in a timely fashion, under its concerns scheme. In all circumstances, once a provider has undergone a second, successful external review (and assuming no concerns about the quality of provision arise thereafter), its subsequent review will take place after an interval of six years. However, in recognition of this shorter interval, and that the mid-cycle monitoring has not been based on peer review, we are asking the QAA to remove the requirement for mid-cycle review for all providers. *Mid-cycle review:* In the consultation document, we proposed that a more risk-based approach to quality assurance should equally apply to mid-cycle progress monitoring, so that the nature of the QAA's involvement in this would vary according to the individual circumstances of the provider. While we did not ask a specific question about mid-cycle review, a number of respondents stressed the need to achieve an effective balance between the various elements of external review. In recognition of the retaining of a shorter cycle, and that the mid-cycle monitoring has not been based on peer review, we are asking the QAA to remove the requirement for any provider to undergo mid-cycle review. We believe that quality and standards can be effectively safeguarded between reviews through recourse to the QAA's concerns scheme, and that enhancement activities will be unaffected by removing mid-cycle

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[3] Currently under Institutional Review, if an institution receives a 'fails to meet' judgement or makes unsatisfactory progress on a 'requires improvement to meet' judgement, and then subsequently fails to make satisfactory progress in implementing an improvement plan agreed with the QAA, HEFCE's 'Policy for addressing unsatisfactory quality in institutions' (HEFCE 2011/36, available at www.hefce.ac.uk/pubs/year/2011/201136/) will be triggered. We will update this policy for the start of the risk-based approach to quality assurance in 2013-14, to take account of the new funding and regulatory environment.

review. Moreover there are other alternative mechanisms (for example, review action plans) that follow up where action is needed after a review. The removal of mid-cycle review will substantially reduce administrative demands.

Question 6a.

Should – and, if so, how might – the QAA seek to streamline or modify its external review activities for those providers which have a substantial proportion of their provision accredited by PSRBs?

Question 6b.

Please explain the reasons for your answer.

Table 5. Responses to Question 6a

Respondent Type	Response	Number	Total	Percentage (to nearest whole)
HEI	Strongly agree	12	14	11%
An individual (not currently a student)	Strongly agree	1		
Other – please specify in box below	Strongly agree	1		
HEI	Agree	31	53	43%
FEC	Agree	4		
Other provider of HE	Agree	2		
Student union or other student organisation	Agree	2		
Other – please specify in box below	Agree	14		
HEI	Neither agree or disagree	19	31	25%
FEC	Neither agree or disagree	4		
An individual (not currently a student)	Neither agree or disagree	2		
Student union or other student organisation	Neither agree or disagree	1		
Other – please specify in box below	Neither agree or disagree	5		
HEI	Disagree	15	22	18%

FEC	Disagree	2		
Other provider of HE	Disagree	1		
An individual (not currently a student)	Disagree	1		
Student union or other student organisation	Disagree	1		
Other – please specify in box below	Disagree	2		
HEI	Strongly disagree	3	4	3%
Student union or other student organisation	Strongly disagree	1		
TOTAL			124	103%

Please see note to table 2 above. Note also that where the total of percentages is above 100 per cent, this is due to the rounding-up of totals.

70.   In the consultation document, we asked whether, and if so how, the QAA should seek to streamline or modify its external review activities for those providers which have a substantial proportion of their provision accredited by PSRBs.

71.   There was clear support, 54 per cent, for the notion that those providers with the majority of their provision accredited by PSRBs ought to have a streamlined, less intense QAA review in recognition of this. Others felt that it could justify a further extension of the QAA review cycle, beyond the standard interval agreed. One suggestion was that the QAA investigate the extent to which information originally prepared by institutions for PSRB review might contribute to their QAA review self-evaluation document.

72.   Interestingly, five of the supporting respondents voiced similar reservations to those offered by those who **disagreed** with the proposals.

73.   The 26 respondents (21 per cent) who disagreed or strongly disagreed were from a diverse range and primarily referred to the variations in approach, focus and rigour of PSRBs. There was also concern that PSRBs which had previously relied on the outcomes of regular QAA audits might now simply increase their level of intervention, negating any benefits to the institution. A common theme, identifiable in 22 of the 26 responses disagreeing with the proposals, was the essential difference between the two processes. It was widely acknowledged that PSRB's review processes and those of the QAA do not produce broadly comparable information, with the former focussing on standards of subject-level accreditation and the latter being a peer-led consideration of institution-wide management of standards and quality. Respondents also commented that PSRB accreditation varies significantly, according to whether the programme is accredited for professional or statutory-regulatory purposes. The low level of student engagement with PSRB accreditation processes was also noted.

74.   Thirty-one respondents (25 per cent) neither agreed nor disagreed. Only 20 of these responses offered views and comments.

75.   A number of respondents commented that, as PSRB activity varies significantly, it would be difficult to achieve consistent cross-sector progress in this area. The consultation, therefore, only produced a few tangible proposals for how PSRB and QAA activity could be streamlined. The proposal offered by the largest number of institutions concerned synchronised timetabling of review. Some institutions proposed that PSRB accreditation should, as a minimum, take place in the same academic year as an institutional review. A number of respondents also called for the QAA to take the evidence of PSRB reports into greater consideration in its deliberations.

76.   One PSRB indicated that, while it appears from the QAA protocol for visits that PSRB accreditation reports are referred to, the extent of this is unclear. This is especially so where such reports have the status of being 'confidential' between the PSRB and the university, and there has been no appetite among the profession for published accreditation visit reports. A greater exchange of information between the QAA and PSRBs about how such a process might work would be welcome.

77.   Other suggestions included that PSRB reports could be regarded as useful case studies of an institution's implementation of its policies and processes. An institution's own periodic review reports of schools or departments could also be used in this way. Similarly, a good track record of significant, cross-university PSRB links successfully managed over time could be a factor justifying a shorter, less intensive QAA review.

HEFCE response

78.   HEFCE is fully supportive of the progress made in this area and we are therefore pleased to engage with HEBRG's discussions of this issue. Discussions on this are also taking place under the auspices of the Regulatory Partnership Group (RPG, formerly the Interim Regulatory Partnership Group), which brings together the sector organisations with oversight responsibilities for HE in England. The RPG recently commissioned a review of the data and information landscape. The review made recommendations for achieving an improved data landscape for HE, including common data standards and a coherent approach to data collection. PSRBs' information requirements will be identified as part of a second phase of this work, which is intended to investigate the data and information demands made on HEIs and find ways to streamline them.

79.   In addition to supporting this ongoing activity, HEFCE is asking the QAA to make further progress in this area, in particular through the further development of individual agreements with PSRBs. Specific agreements with the General Medical Council, General Dental Council and Ofsted have contributed to reducing burden on institutions. This case-by-case development approach is also appropriate in view of the number of PSRBs and their different roles according to statutory, regulatory and course accreditation requirements.

80.   In order to address this issue further, HEFCE will invite the QAA to consider how greater weighting can be given to PSRB reports (where available) as evidence in reviews, and how to obtain and consider more reports prior to a visit; and, where possible, to consider greater synchronicity in timetabling between QAA and PSRB visits, should a provider express a desire for this.

Question 7a.

What form of annual assessment of key quantitative and qualitative data could be undertaken to determine whether there are grounds for any out-of-cycle investigations, which may or may not lead to some kind of formal review?

Comments in support of the proposals

81.   The consultation stated that the logic of a risk-based approach calls for mechanisms to instigate out-of-cycle interventions. Data and information 'triggers' could draw attention to possible issues that could then be looked at further. Such an approach would add a flexible, responsive element to quality assurance arrangements and direct effort to where it might be most needed. We noted that such a mechanism already exists in the QAA's concerns scheme, and we proposed a further trigger which would take the form of an annual review of nationally collected benchmarked data. We also proposed to publicise the ability of students to trigger QAA investigations.

82.   Of the 124 responses to this question, 10 per cent stated that they welcomed or were comfortable with some light-touch interim monitoring. One institution noted that this was particularly appropriate should the intervals between full reviews extend to 10 years. However, most favourable responses (12 out of 13) noted caveats or concerns that were also raised by respondents who were not in favour of the key proposal of an annual assessment of data.

83.   Most respondents were unhappy with an annual assessment of data which might trigger some kind of formal review. Indeed, comments on this aspect of the trigger proposals dominated responses to this section. Reservations were expressed in 71 per cent of responses, 35 per cent expressing strong reservations. Concerns were voiced about the context, robustness and use of the data, the composition of the assessment panel and the practicality of, as well as the need for, any form of annual review.

84.   Respondents suggested that the work of a panel would be very complex, that members with appropriate abilities should be selected, and that conflicts of interest would need to be taken into account. One institution also noted that, if it were to go ahead, they would wish the assessment panel to be formed through open recruitment and to include at least one member who was fully independent of HEFCE and the QAA. Others stated that student representation should be included. Many agreed that the decision-making protocol needed to be clear – including how decisions would be made public.

85.   Issues raised on the proposed data set included concerns that the data sets would be partial; for example the National Student Survey is only completed by final-year undergraduate students. Smaller institutions and FECs may lack data sets due to small cohorts, or be subject to high levels of year-on-year volatility due to small sample sizes. Data could be difficult to interpret without institutional commentary, and would require robust benchmarking and information on the institutional and regional context. Furthermore, it was highlighted that the data would quickly be out of date and any issues identified might already be resolved by the institution. One respondent noted that data review was not consonant with the broader approach of peer-based quality review addressing procedures rather than products.

86.   Nine per cent of respondents felt that they would want to (or would want to be asked to) respond to, contextualise or comment on any data used, while the level of burden was a source of concern for some respondents. A commitment that data collections would cause no additional burden was requested by 8 per cent of respondents. Seven per cent of respondents thought that an annual review of data would be superfluous if the review cycle remained at six years; another response noted that even if the interval between reviews was increased, the risk of an additional 'out of cycle' review being triggered could negate any benefits. Two respondents suggested that the interval between data assessments should be longer than one year, or that this requirement should not apply to all institutions on Route B.

87.   The QAA concerns scheme was commented on by 8 per cent of respondents. Most were positive about the scheme and considered that its existence continued to offer a viable alternative to an annual data review. Three respondents were concerned that the remit should remain clear and that the scheme should remain distinct from the work of the Office of the Independent Adjudicator (OIA).

Question 7b.

Are there any other data or information sources that the panel should consider?

88.   Suggestions for other data or information sources were made in 42 per cent of the 101 responses to this question. A further 47 per cent of responses made no comment or suggestions. Twelve per cent reiterated their opposition to an annual assessment of data.

89.   The need for data on postgraduate students was raised by 8 per cent of respondents, either through a new survey in the style of the National Student Survey or using the Higher Education Academy's Postgraduate Taught Experience Survey and Postgraduate Research Experience Survey. PSRB reports or accreditation were suggested by another 8 per cent of respondents, as was giving student unions the ability to raise issues. The number of complaints raised with or upheld by the OIA was suggested by 7 per cent of respondents.

90.   A number of other suggestions were raised by between one and five respondents. These included:

- asking for annual statements or self evaluation forms from institutions
- looking at external examiners' reports
- widening participation indicators
- Ofsted reports
- audits carried out by validating bodies or the Skills Funding Agency
- adverse media comment
- change of ownership or of senior management team
- spending on staffing.

91.   The principle of annual data reviews was also unpopular with delegates at the consultation events: delegates were concerned about data and burden. It was clearly noticeable that most respondents to the consultation would be pleased if the proposal for an annual assessment of data to determine grounds for any out-of-cycle investigations was not taken forward.

HEFCE response

92.   In the light of the changes to the frequency, nature and intensity of review and the concerns expressed, we will not be implementing our proposals for the annual data review by an external panel. HEFCE remains of the view, however, that there are national data which are relevant to the consideration of quality and standards at institutional and sometimes departmental or subject level.

93.   We will therefore ask the QAA to ensure that all providers make explicit reference in their self evaluation documents to their achievements and shortcomings against relevant nationally benchmarked data, such as the National Student Survey and national performance indicators. We also ask the QAA to encourage student unions to give detailed consideration to the published data sets, and to comment as appropriate in the student written submissions. Should data or other information suggest that a provider's performance is falling below its benchmarks, we will look to the QAA to consider the reasons given for this and, equally importantly, the steps the provider is taking to bring about improvement. We will ask the QAA to ensure that review teams take account of this when they form their judgement, and to report annually to us on how the sector is responding to this new focus and any broader issues or concerns the Agency has as a result. The QAA may also wish to consider how to ensure that good practice addressing this area, including in written submissions, is shared and disseminated.

94.   As part of its statutory duty, HEFCE is asked to form an annual opinion on both the performance of the QAA and the quality assurance system as a whole. This annual opinion is reported to the National Audit Office and BIS. We expect the information from the QAA which helps inform this annual opinion will, in future years, make explicit reference to how institutions are using and responding to 'nationally benchmarked' data.

95.   HEFCE's Executive may still consider use of the concerns scheme if it is felt there is sufficient justification.

96.   To ensure that the concerns scheme operates effectively and robustly, we will encourage the QAA to further its efforts to raise awareness of the scheme, especially by working closely with student organisations.

97.   Also a number of responses indicated that the difference between the QAA Concerns Scheme and the OIA complaints service does not seem sufficiently clear, and the interconnections between the two would seem to need some development. This will entail setting out clearly when a student should raise an issue under the QAA's Concerns Scheme (if it indicates serious systemic or procedural problems), or through the OIA which deals with individual student complaints about providers. With this in mind, we are pleased that the QAA and the OIA have a memorandum of understanding in place concerning information-sharing, and we look to their continued efforts to ensure greater clarity and awareness regarding recourse to their respective complaints schemes. This will help to ensure that the interests of students are better protected, and are central to quality assurance processes. We will also invite the QAA to continue to make its work more public-facing so that students feel empowered to raise concerns.

98.   We also suggested in the consultation document that changes of ownership could affect quality, and we have indicated above under Question 5 that this information may

> result in the review of a provider being brought forward.

Question 8.

Do you have any other comments on this document or further suggestions for what we might do?

99.   This section of the consultation offered respondents a chance to comment on any aspect of the consultation where they had additional thoughts, or any particular issues they wished to raise which fell outside the scope of the previous questions.

100.   A number of respondents also used this section to comment specifically on the proposal for a fast-track to Route B. These comments have been considered under the analysis of Question 5.

101.   Although 80 per cent of respondents included comments under Question 8, many of these elaborated their responses to earlier questions. So, for example, 12 respondents chose to comment further on the data panel and trigger proposals, and a similar number commented further on the proposals for establishing Routes A and B.

102.   The substantive comments generally fell into the following categories.

Scope of the consultation

103.   Approximately 20 respondents commented on the remit and scope of the consultation itself, some arguing that the consultation paper did not make a convincing case for a 'risk-based' approach. Some questioned whether the consultation had been undertaken in line with the requirements set out in the White Paper and subsequent documentation. There was a concern that the proposals did not offer 'substantial de-regulation' or 'consult on the criteria against which risk would be assessed'. Some respondents considered that a more fundamental 'back-to-basics' approach would have been more appropriate; others suggested closer scrutiny of other aspects of the quality assurance system. One respondent suggested that there should be a review of the UK Quality Code from 'first principles' in order to ensure that it focuses only on those areas that are essential to ensuring that universities are exercising their independent degree-awarding powers responsibly.

104.   Others felt that proposing further changes to the QAA review methods was poorly timed because Institutional Review is still in its first year of operation. Many who commented on the new method did so positively, and were concerned that the benefits of the approach needed time to be felt by more institutions. These respondents also pointed out that the new method was itself the result of an in-depth consultation in 2010.

Use of the term 'risk'

105.   Similarly, around 20 respondents commented on the use of the terms 'risk' and/or 'risk-based'. There was a suggestion by many that we should have made a more rigorous attempt to define 'risk' within this context, being clear about the sources of risk. Many of these respondents suggested we should not have discounted the possibility of using a graded 'risk assessment' in developing the new approach.

106.   A handful of respondents expressed unease with the terminology itself- speculating that the term 'risk' could have an impact on current students and the reputation of the

sector internationally. More generally, some felt that a 'risk-based' approach was overly negative and that more consideration could have been given to 'opportunities' . A critical point raised was that use of the word 'risk' should not necessarily imply that provision was 'risky': an 'institution needs to be innovative and take risks – to fail to do so would be inherently risky'. Several respondents noted that these risks can be managed and mitigated, and do not result in 'risky' provision.

107.   Indeed, a number of these responses suggested the consultation did not reflect the risk management practices currently used within the sector, with one commenting that 'risk assessment should be driven by a desire to anticipate and prevent problems, and not by the need to react once the damage has been done'.

108.   Some suggested the term 'risk-based' was more appropriately linked to financial sustainability than quality assurance.

Costs versus benefits

109.   Six respondents explicitly questioned whether the benefits offered by the proposals warranted the time and effort, and potential financial investment that would be needed to implement them.

Lack of focus on student engagement and enhancement

110.   Approximately 15 respondents made particular reference to student engagement or enhancement. There were several themes which emerged from these responses:

a.   The proposed approach could inadvertently encourage HEIs to be risk-averse and less willing to innovate, and to learn by trial and error.

b.   Risk implies too close a focus on systems and processes, as opposed to improving the student learning experience.

c.   Disappointment that student engagement was generally considered in the context of the 'triggers' and in terms of addressing problems and concerns, rather than in terms of the benefits of working with students as partners.

d.   Concern that the proposals offered nothing substantively new in terms of either student engagement or enhancement.

e.   Suggestions that external review by the QAA could involve significantly more time with students and considerably less with staff (this suggestion was made by only a very small number of respondents).

f.   The relationship between the QAA concerns scheme and the OIA complaints scheme does not seem sufficiently distinct, and the interconnections between the two would seem to need some development.

g.   A desire to protect students at 'triggered' institutions.

h.   One suggestion that the QAA concerns scheme should encourage approaches from students through their local student union, suggesting that this would encourage unions to focus their efforts towards quality and enhancement of the learning experience.

Review

111.   One respondent commented that we would need to review the new approach after two years to evaluate the impact of any changes made.

HEFCE response

112.   *Our approach to risk in this context:* We clearly set out the parameters for our consultation, as agreed with BIS in that we were building on the process of change over the past few years. There was no suggestion that a full 'first principles' review was required, given that such a process had already taken place prior to the establishment of the current principles for the management of quality and standards, and the current institutional review method.

113.   We continue to believe that our recommendations are about the national oversight of quality assurance, which concerns the processes in place to assure quality and standards. The QAA is contracted to look at these processes and how they are managed by institutions. A risk-based approach ensures that the QAA directs its attention as an independent body where it will have the most impact. Our outcomes, as set out in the main report, will therefore continue to support the QAA's primary responsibility of looking at institutional arrangements for ensuring quality and standards of provision. We would not wish to, and could not, extend the QAA's remit further (for example by proposing special consideration of governance and management issues across the spectrum of institutions' activities). Governing bodies are responsible for ensuring that institutions have an effective framework to manage the quality of learning and teaching and to maintain academic standards. HEFCE already has established processes for monitoring the risk profile of institutions. This draws on the accountability information we routinely collect, and on other information such as quality assurance assessments. When we have major concerns, we may need to intervene to protect the interests of students and the public. We do this through our institutional engagement and support strategy.

114.   *Quality Enhancement:* We remain of the view that an essential element of the quality assurance system is a commitment to continuous improvement and enhancement. We have noted the concerns in responses that a move to a more 'risk-based' approach might stifle innovation or undermine this principle. We will take the active steps we promised in ensuring the QAA and the Higher Education Academy work together to facilitate change and improvement, building on their significant progress and achievement to date.

115.   *Student Engagement:* We are strongly supportive of the broader focus on student engagement and, although we do not plan to change current arrangements, we do intend to work together with the NUS, the QAA, the Higher Education Academy and other partners to ensure that good practice in the sector is further sustained and strengthened. We also acknowledge that the QAA will be reviewing its new chapter of the Quality Code (B5: Student Engagement) after two years, to ensure that it remains sufficiently challenging.

116.   *Evaluation:* We plan to commission an independent evaluation of the revised approach in 2015-16, once it has been in operation for two years.