



Institutional audit consultation

Proposed changes to the Institutional audit process

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Introduction

Following discussion and consultation with the sector on possible changes to two aspects of the Institutional audit method used in England and Northern Ireland: the approach to the audit of collaborative provision and the inclusion of student members within audit teams, the Quality Assurance Agency for Higher Education (QAA) undertook an external consultation. Institutions were invited, via a circular letter (CL10/08), to provide comments on their institution's views on the operational implications of the changes.

Both through the work of the Quality Assurance Framework Review Group and through (QAA) own activities, agreement had previously been reached in principle between Universities UK (UUK), GuildHE, the Higher Education Funding Council For England (HEFCE) and QAA on the following changes:

- the introduction of an approach to the audit of collaborative provision which will include, as appropriate, within-audit, hybrid audit, or separate collaborative audit activity
- the inclusion of student members on audit teams.

QAA has sought to consult on the operational detail of those decisions.

Summary

Sixty responses were received to the consultation.

The key findings from the consultation in respect of the inclusion of student auditors on the audit team were:

- Do you agree that from spring 2010 all audits should include a student auditor, or should an opt-out be available until the end of the audit cycle?
Agree, students should be included and an opt-out allowed
- If an opt-out option is allowed, should an extra auditor be recruited to ensure teams of equal sizes?
No
- Do you agree that the student auditor should be an additional member of the audit team?
Yes
- Do you agree with the proposed role for the student auditor?
Yes
- Do you agree with the categories for eligible students?
Yes
Are there others?
Suggestions included:
Minimum of two years experience of higher education (HE), not one.

12 months post 'student' as active, not two years.

- Do you agree with the[se] selection criteria?
Yes

Are there others that you would wish to suggest?

Suggestions included:

- Greater clarity in specification of criteria and evidence required.
 - Address potential bias towards sabbatical officers.
 - Ensure equality of access to undertaking role of student auditor.
 - Ensure criteria are not overly prescriptive and limit the pool of potential auditors.
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- Do you consider these to be the main requirements for training of a student auditor?
Yes

Further comments included:

- Additional training for student auditors on:
- the UK context of quality and standards
- diversity within the UK HE sector
- Support for student auditors beyond the training

Section 1: The inclusion of student members on institutional audit teams

In September 2007, QAA wrote to HEFCE, the Higher Education Funding Council for Wales (HEFCW), the Department for Education and Learning in Northern Ireland (DELNI), UUK, GuildHE, Higher Education Wales (HEW), the Higher Education academy (HEA), NUS, NUS Wales and the National Postgraduate Committee informing them that it would be undertaking a feasibility plan for the inclusion of student members on institutional audit teams, with a view to implementing any necessary changes during the 2008-09 academic year.

The QAA Board of Directors had given this matter careful thought, concluding that there were three key reasons why it was the right time to introduce this change to practice.

- QAA Scotland has, for a number of years, included students as full members of Enhancement-Led Institutional Review (ELIR) teams. The external evaluation of the ELIR process indicated that student reviewers had played an important and highly successful part as a defining feature of the Scottish quality assurance model, and were fully recognised and accepted as a valuable element in the process.
- As a member of ENQA (the European Association for Quality Assurance in Higher Education), QAA is expected to act in accordance with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) set out in 2005. The ESG clearly state that the participation of students in quality assurance activities and external assessment is an expectation and this is becoming standard practice among ENQA's members.
- As the higher education landscape has evolved over recent years, so too has interest in and focus on the experience of students and on their participation in the organisation of their learning, within both their institutions and the sector as a whole. It is a natural progression of such developments that students will wish to become more deeply involved in quality assurance and more directly involved in the audit and review processes.

In the light of this analysis, the opinions of the funding councils and sectoral bodies were sought on:

- the likely impact of student membership on the structure and function of audit teams
- the potential role of student auditors in the audit process
- the optimal profile of students to be recruited
- the proposed timescale for implementation.

The responses to the 2007 consultation indicated that there was considerable support for the introduction of student members of audit teams, but that further consideration of the operational detail, especially the timetable for introduction of student members, was required. Several questions were raised about the impact of such a change on the integrity of the current audit method, its introduction during an audit cycle and the operational and logistical requirements for involving students as auditors.

Following this consultation, QAA agreed to have further discussions with its subscribers to explain the rationale for these proposals and to explore further some of the concerns raised in that earlier round of consultation. It was also agreed to conduct an evidence-gathering pilot exercise by including student observers on selected institutional audits in spring 2008.

By May 2008 the student observers had attended audits and had provided full and detailed reports to QAA about their experience. They provided information about their perception of the process, about how a student might contribute as a member of the team and identified additional training and support requirements. This feedback was analysed and in July 2008 QAA organised a conference to discuss student membership of institutional audit teams in England and Northern Ireland. The conference provided an opportunity for delegates to hear about the experience of student members of review teams in Scotland, an HEI's experience of working with students as members of internal review teams and to hear directly from the student observers themselves about their experience. All HEIs in England and Northern Ireland were invited to send representatives, and were encouraged to include student representatives.

Overall there was strong support for the proposals, but there remained a request for further clarity in respect of the logistics and specific detail for student membership of audit teams. In view of the need to consult further on this operational detail, QAA's Board has now agreed to revise its original timetable for introduction of student members.

The proposals

QAA is now proposing that student members of audit teams should be introduced from the academic year 2009-10. The need for an extensive programme of recruitment and training means that the first audits which will include student auditors will be those taking place in the spring term 2010. Some 48 institutions will be taking part in audits from spring term 2010 to the end of the cycle. Some institutions have been concerned that the introduction of student members in audit teams in the middle of an audit cycle will create a disparity in treatment of institutions. In the light of this, QAA has agreed with UUK and GuildHE to consult on the possibility of institutions, for the remainder of this cycle, being able to opt out of having a student member on its audit team. Were this to be the case QAA might need to decide whether to recruit an additional academic auditor to the team, or accept that different institutions would be visited by differently-sized audit teams for the remainder of the cycle.

The student auditor will be additional to the existing number of auditors; so that the audit team would normally include five auditors (including the student member) and the audit secretary.

It is envisaged that the role of the student member will be the same as that of other auditors, that is, the student auditor will take part in all aspects of the audit explorations and contribute to all of its findings, and will take part in the writing of the report.

Those eligible for appointment as student auditors will be students with current or recent (within two years) experience within a higher education institution in England or Northern Ireland amounting to a minimum of one year's full time study (or its equivalent). Students' union/association/guild sabbatical officers will be eligible.

As with current auditors, student auditors will be nominated by their institution and recruited against a set of published criteria. They will be required to participate in the residential training provided by QAA before they may take part in an audit. Wherever possible they will be trained alongside other new and returning members of audit teams. As well as receiving the usual audit training, student auditors will receive extra sessions dealing with the England/Northern Ireland higher education quality assurance environment and an introduction to the operation of governance in HEIs. However, we envisage that most student auditors will have some awareness of national quality assurance matters. They will be required to have had experience of engaging with senior level decision-making about quality assurance and enhancement in their own institution.

Some minor changes to the *Handbook for institutional audit: England and Northern Ireland 2006* are required to accommodate the proposed change to the audit team. These can be seen in the draft revised handbook.

Some colleagues in the sector have raised concerns that the introduction of students as auditors is a significant change to the nature of institutional audit as a peer review process. QAA considers a peer to be a person of equal importance, carrying out a comparable role to others within an organisation. Given the centrality of the student experience to the audit process, and the participation of students from an HEI in the preparation for audit, QAA sees student membership of its teams as entirely consistent with this concept of peer review. This position is bolstered by the almost universal participation throughout the sector of students as members of HEI deliberative bodies, and increasingly as members of internal review teams.

QAA is currently reflecting on the method which will follow the end of the current Institutional audit method. It is intended to include full student participation (as auditors, or whatever role the new method demands) in that method from its inception, expected in 2011-12.

Consultation questions

Six questions were posed through the consultation.

- Do you agree that from spring 2010 all audits should include a student auditor, or should an opt-out be available until the end of the audit cycle? If an opt-out option is allowed, should an extra auditor be recruited to ensure teams of equal sizes?
- Do you agree that the student auditor should be an additional member of the audit team?
- Do you agree with the proposed role for the student auditor?
- Do you agree with the categories for eligible students? Are there others?
- Do you agree with these selection criteria? Are there others that you would wish to suggest?
- Do you consider these to be the main requirements for training of a student auditor?

Response to the consultation

Overall, there was broad support for the inclusion of students as full members of audit teams. However, there was diversity in views expressed by respondents as to whether student auditors should be added to the team mid-cycle and whether there should be the opportunity for institutions to opt out from the current arrangements for the remainder of the current audit cycle.

It was acknowledged that any recruitment of students to audit teams, and the associated requirements of the role, need to be mindful not to impact upon the students' academic studies, recognising the potential conflict between the time commitment of acting as a student auditor and fulfilling the requirements of academic study.

It should be noted that not all 60 respondents provided a response to each of the questions posed, and therefore, where numbers for and against the question are provided, they do not necessarily total 60.

1 Do you agree that from spring 2010 all audits should include a student auditor, or should an opt-out be available until the end of the audit cycle?

In the main, respondents favoured the opportunity for an opt-out of having a student auditor until the end of the cycle.

Twenty-six respondents supported the proposal to allow an opt-out from having a student auditor on the team. It was considered that the provision of an opt-out would alleviate concerns about a mid-cycle change to the process, and allow institutions to have an experience equivalent to that of those institutions audited earlier in the cycle.

Eleven respondents simply stated that they supported the introduction of a student auditor to teams from 2010, but made no statement regarding whether institutions should be given an option to opt-out.

Seven respondents considered that the changes should not be introduced mid-cycle, as this would create a disparity in the audit process between institutions audited later/earlier in the process. On this basis, it was suggested that either implementation is delayed until the start of the next cycle, or an opt-out is permitted until the start of the new cycle.

Nine respondents considered that an opt-out option was not necessary. It was considered that if an opt-out was permitted then this would bring a further element of inconsistency to the process.

Two respondents suggested that rather than opting out, institutions should be given the opportunity to opt-in.

2 If an opt-out option is allowed, should an extra auditor be recruited to ensure teams of equal sizes?

The general consensus from respondents was that should an institution choose to opt out from having a student auditor, then there should **not** be an extra auditor recruited to the team.

3 Do you agree that the student auditor should be an additional member of the audit team?

Twenty-five respondents agreed that the student auditor should be an additional member of the audit team. Only eight disagreed with the proposal, suggesting that the student auditor should replace one of the academic auditors and assume the responsibilities of the auditor role accordingly.

However, some question was raised as to whether including a student as an additional member of the team should be extended beyond the current cycle.

4 Do you agree with the proposed role for the student auditor?

Thirty-five respondents agreed that the student auditor should be a full member of the audit team. It was considered that the student auditors should have equivalency of status in role, responsibilities and remuneration as other members of the team. However, it was recognised that a student auditor would have different experiences and skills and therefore training would have to be sufficiently thorough and tailored to meet their needs.

Nine respondents considered that the student auditor should not have the same role and responsibilities as other members of the audit, due to the different skills and experience that a student auditor would bring to the role. In addition, a small number of respondents suggested that inclusion of a student auditor as a full member of the audit team, with responsibilities for making judgements, deviated from the notion of peer review.

It was suggested that the student auditor could have a distinct role, and that a narrower focus might encourage more students to the role. In addition, although broadly supportive of student auditors, it was re-iterated that due to the skills, experience and knowledge that student auditors bring to the role, their role should be distinct and reflect the student perspective.

5 Do you agree with the categories for eligible students? Are there others?

There was broad support for the stated categories of eligible students.

It was suggested that eligibility to undertake the role of student auditor should be linked to experience rather than necessarily length of time of/post-HE studies.

There was some suggestion that student auditors should be representative of the student population, in terms of demography and discipline specialism.

A minimum of one year's experience of HE was considered by some as being insufficient. It was suggested that the criteria of eligibility for student auditors should be a minimum of two years experience in HE. However, if the minimum time in HE was extended, this could potentially render postgraduate students undertaking full-time taught master's programmes ineligible.

There was some concern expressed as to the time limit post completing HE studies that a student auditor could remain active. The time limit of two years post leaving an academic post for auditor eligibility was not considered appropriate for students. Two

years was considered to be too long, and that recent experience should perhaps mean within 12 months.

6 Do you agree with these selection criteria? Are there others that you would wish to suggest?

It was broadly agreed that there should be a rigorous process for the recruitment, selection and training of student auditors.

There was no consensus, as little comment was made, regarding the process for nomination of student auditors.

It was noted that given the diversity of the higher education sector, the students recruited should reflect this – in terms of institutional (and discipline) characteristics and student characteristics. It was also highlighted that the selection criteria should not inhibit specific groups of students from applying, for example undergraduates, postgraduates or students engaged in work-based learning. One respondent queried the eligibility for students undertaking a HE programme in a further education college.

Further clarity was requested on what was meant by some of the stated criteria, and the evidence required to demonstrate that nominees satisfy the criteria.

Further clarity was specifically requested about eligibility. It was suggested that the documentation (Appendix B) infers that only those representing student interests are potentially eligible, which raised concern (three respondents) that only sabbatical officers could potentially be eligible. It was noted that the guidance (paragraph 53) also includes reference to current students as eligible to apply. Further clarity was requested. Additionally, there was some concern that the criteria more generally were biased towards sabbatical officers rather than current students.

Specific reference was made to the criterion, ‘they will be required to have had experience of engaging with senior level decision making about quality assurance and enhancement in their own institution’. A small number of respondents felt that there was a lack of clarity as to how this might be interpreted by institutions, students and QAA and that it may potentially put students off who are engaged at school/faculty/department level. It was felt that the latter should not be excluded from eligibility due to not having participated at institutional level.

Specific reference was also made to the requirement that student members of audit teams be aware of arrangements for quality assurance and enhancement across the sector as a whole. It was noted that in most cases, experience will be limited to their own institution. Again, this was seen as potentially precluding students from applying/nomination/selection. The wider arrangements for quality assurance across the sector were considered as an integral part of training, rather than a criterion for nomination/selection.

The Equality Challenge Unit (ECU) noted that selection criteria must consider issues of diversity and equality, and ensure that applicants with disabilities are not deterred from being nominated or selected. Specific reference was made to the wording of the criterion regarding the requirement to have ‘good oral and written communication skills’ be reviewed. They suggested that revision of this criterion should ensure that deaf, hearing

impaired and learning impaired students are neither discouraged from being auditors nor discriminated against.

Additional criteria suggested included:

- the ability to understand a wide range of university regulations, policies, processes and systems; or awareness of university regulations, policies, processes and systems
- a requirement for applicants to confirm that they will be able to commit the time required to undertake the role
- experience of the synthesis and analysis of material from a variety of sources.

7 Do you consider these to be the main requirements for training of a student auditor?

There was broad agreement with the main requirements for training of a student auditor specified in the documentation. It was considered that training was central to the success of the role of the student auditor.

Suggestions were made for additional inclusions to the training programme. Two such suggestions related to the provision of a mentor for student auditors, so providing support. In addition, it was suggested that student auditors were given an extra briefing on the sector, allowing them to see the sector in context, gain an understanding of historical factors in respect of quality and standards and gain an insight into the diversity of the HE sector in England.

Additional training was suggested for student auditors, to ensure that they are 'at a similar starting point' as other auditors.

Reference was made to the notion of equality and diversity. Three respondents noted that some individuals may be prevented from undertaking the training or an audit due to socio-demographic characteristics, to include special needs and/or caring responsibilities. It was additionally suggested by ECU that QAA should conduct an equality impact assessment in respect of training – as some groups might be disproportionately affected, and unable to/be put off from attending a training event or audit.

Other suggestions for inclusion in training included:

- report writing
- leading and participating in discussions
- quality assurance
- the diversity of the UK HE sector
- clear guidance on the boundaries of the role
- additional support (mentors)
- confidentiality matters and matters of appropriate practice
- specific training on institutional types (especially in respect of small and specialist institutions)
- hands on practice and role play
- observation of an audit

- feedback from experienced student auditors
- development and use of the Academic Infrastructure.

One institution queried, (paragraph 11 and Appendix B, paragraph 7) whether the student auditors would be able to audit in Wales, given that reference was only made to England and Northern Ireland.

Section 2: Changes to auditing of collaborative provision

In autumn 2007 the Quality Assurance Framework Review Group (QAFRG) commissioned research into the impact of reviews of collaborative arrangements on HEIs. This included consideration of the collaborative provision audit process that took place between 2004-07.

QAFRG reported in July 2008. However, for logistical reasons QAA was not able to wait for publication of QAFRG's report before developing the next process for auditing collaborative provision. A tripartite approach was suggested where collaborative provision could be audited within institutional audit; as part of a hybrid institutional audit; or as a separate audit activity. This approach was endorsed in principle by the QAFRG late in 2007 and QAA is currently (autumn 2008) piloting a hybrid audit.

QAFRG's report in July 2008 again endorsed the tripartite approach as an appropriate one for audit of collaborative provision during the remainder of the current audit cycle (that is until the end of the academic year 2010-11). QAA had agreed to consult the sector on the operational detail of the revised approach, and that detail is the subject of the present consultation.

Essentials of the hybrid model

Where QAA considers that it is not practicable to consider collaborative provision as part of the institutional audit, it will be audited through either a hybrid institutional audit (hybrid model) or a separate audit of collaborative provision. In coming to its decision about the type of approach to be taken QAA will consider the following factors: the number of overseas partners; the number of UK partners; the number of private partners; the number of students on each type of partnership; the outcomes of previous audit and review activities; and the level of forthcoming audit and review activities.

The hybrid model follows the process for the institutional audit of 'home' provision, with the exception that the hybrid model includes visits (or video-conference links) to up to three partner links, to take place between the briefing visit and the audit visit. The objective of visits to partner institutions is to enable the audit team to understand more clearly how the collaborative provision is managed.

The process for the audit of collaborative provision, either as part of institutional audit, or as a separate activity will remain as they are operated at present.

Piloting of the hybrid audit approach has revealed minor operational details which have required further thought, but no major drawbacks to the approach.

Response to the consultation

Of the 60 respondents to the consultation, 43 provided comments on the proposed changes to the auditing of collaborative provision. Institutions were generally positive about the three approaches to collaborative provision audit, however, there were areas on which they would like further clarification.

The primary area that institutions would like to see more detail on was the criteria that will be used when deciding which of the three methods are to be used to audit an institution's collaborative provision. Respondents commented that 'the criteria for establishing which approach the QAA will adopt remain unclear and should be further quantified', and that the criteria for establishing which approach the QAA will take to the audit of collaborative provision could be made more clear: for example, a definition of what might constitute 'the number of overseas or UK partners falling into each approach, so that institutions would have a fair idea in reading the handbook which approach might apply to them'.

Some respondents would also like to see more transparency regarding the criteria to be used when selecting the number and nature of partner institutions.

'The arrangements for selecting partner link organisations need greater clarity. Further consideration needs to be given to the threshold for the size of portfolio of collaborative provision that justifies a partner visit and how the range of formal arrangements within the portfolio will be evaluated – for example, what constitutes high risk within a formal arrangement.'

'Similarly, the criteria for determining the number of visits to partner links (paragraph 91 of the draft revised Handbook) are not sufficiently clear. It says that this will be determined at a preliminary meeting with the QAA assistant director, but does not explain how a decision will be reached. In the interests of transparency, we believe that the factors which will be taken into account should be published in advance.'

Other areas where further clarification would be welcomed included:

- how IQER outcomes will be used by the audit teams
- whether student auditors would be visiting partner institutions
- separate timelines for each method
- the timing of the preliminary meeting for separate collaborative audit.

A number of other comments were made by respondents. These covered a variety of areas but were only mentioned on by one or two respondents.

Annex: List of respondents

Total respondents = 60

Organisation
NUS
De Montfort University
Equality Challenge Unit
Southampton Solent University
York St John University
Bournemouth University
University of Essex
Department for Employment and Learning
Ravensbourne College of Design and Communication
BPP College of Professional Studies
University of Reading
Open University
University of Sunderland
Birmingham City University
Leeds Trinity and All Saints
University of East Anglia
University of Manchester
University of Exeter
Staffordshire University
Sheffield Hallam University
University of Brighton
University of Wales Institute Cardiff
Durham University
GuildHE
UUK
University of Bradford
Manchester Metropolitan University
School of Oriental and African Sciences
Oxford Brookes University
Arts Institute Bournemouth
Canterbury Christ church University
University of Salford
University of Lincoln
Loughborough University
Institute of Education
City University
London School of Hygiene and Tropical Medicine
University of Chester
Aston University
University College Plymouth St Mark and St John

University of Hertfordshire
Council of Validating Universities
University of Sussex
University of Worcester
University of Hull
University of Portsmouth
Goldsmiths University of London
University of Birmingham
Queen's University Belfast
Imperial College
University of Bedfordshire
Norwich University College of the Arts
University of Nottingham
University of Teesside
University of East London
University of Northampton
University of Ulster
Royal Northern College of Music
University of London
University of Oxford

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