

# **Annual report to HEFCE (2012-13)**

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### **Foreword**

QAA is pleased to present its annual report to the Teaching Quality and Student Experience Committee. The report covers the delivery of the requirements specified in the annual contract between HEFCE and QAA, and sets these in the context of the wider work which QAA conducts for the UK's other funding councils, government departments and a growing range of higher education, further education and alternative providers. It attempts to address those areas which have been of particular interest to the Committee in its evaluation of QAA's work. 2012-13 has been a year of considerable activity and significant achievement, and they are reflected in this very full report.

QAA, as an organisation whose purpose is the external evaluation of the performance, in terms of standards and quality, of other institutions, accepts fully the responsibility to submit itself to external scrutiny and evaluation. In addition to the regular scrutiny of our contractual partners, 2012-13 saw two significant and substantial external reviews of our work and ways of operating. In June last year we achieved, following assessment, the Investors in People Silver Award and later that year it was confirmed that a panel of the European Association for Quality Assurance in HE (ENQA), having conducted a full quinquennial review of QAA, had judged us to be fully compliant with all aspects of the European Standards and Guidelines for Quality Assurance (ESG) - the first agency to achieve this evaluation. The reviewers concluded in their report that:

'QAA's overall performance against the standards of the ESG is uniformly high. It is a trustworthy, effective and highly credible agency and a leader in the field. QAA is well-led and well-managed at both Board and Executive levels, with a strong Board, which is both well-informed and constructively challenging. The Panel has been consistently impressed by the calibre and professionalism of all those contributing to the work of QAA in maintaining quality and standards across HE in the UK.'

We are particularly grateful to colleagues from HEFCE and our other stakeholders who contributed to this review and its successful outcome.

Anthony McClaran Chief Executive

## **Executive summary**

This annual report to HEFCE provides an overview of QAA activity for the operational year August 2012 - July 2013, in respect of the contract for that year, together with details of QAA's wider role.

All contractual requirements for 2012-13 were met. Specifically:

**Level of review activity** - 39 reviews were undertaken, with two of these being set aside and rescheduled. Consequently 37 review reports were published. Three review methods were in operation in 2012-13, namely:

- Institutional Review England and Northern Ireland (IRENI) 22 reviews undertaken, with two set aside
- Review of College Higher Education (RCHE) 12 reviews undertaken
- Initial Review (IR) five reviews undertaken.

**Appeals** - three HEFCE-commissioned reviews were subject to appeal, two of which were not upheld and one of which was upheld.

**Concerns** - 105 new cases were handled under the Concerns about Standards and Quality Scheme, comprising 87 submissions and 18 cases initiated by QAA, representing an 87 per cent increase in cases from the previous year. Ninety eight of these cases related to providers in England. QAA also handled 570 email and phone enquiries relating to the scheme during the same year. Fifty eight of the 98 cases proceeded to the initial inquiry stage.

**The UK Quality Code for Higher Education** (the Quality Code) - the following Chapters of Part B were published in 2012-13:

- Chapter B10: Managing higher education provision with others
- Chapter B4: Enabling students' development and achievement
- Chapter B9: Academic appeals and student complaints.

Consultations were completed on the Chapters listed below, which were published in October 2013, together with Part A: 'Setting and maintaining academic standards', completing the Quality Code as a set of external reference points to replace the previous Academic Infrastructure:

- Chapter B1: Programme design and approval
- Chapter B2: Recruitment, selection and admission
- Chapter B6: Assessment of students and recognition of prior learning
- Chapter B8: Programme monitoring and review.

**Maximising the impact of student engagement activities** - QAA continued to engage students actively as informed and constructive partners in shaping and developing quality assurance, and the enhancement of higher education. Work in 2012-13 was structured around four priority areas:

- i) Ensuring QAA's work has student needs at its heart
- ii) Supporting institutions, students and students' unions
- iii) Supporting and extending student involvement in reviews
- iv) Communicating effectively with students.

**Evaluations** - all review methods were evaluated and reported upon separately, on the basis of data collected from all stakeholder types. The overall response rate in 2012-13 was 88 per cent, an increase from 77 per cent in the previous year. This evaluation activity contributes to QAA's critical self-reflection and continuous improvement of performance.

#### The wider role of QAA

Emergent themes and trends in 2012-13 included:

- a more consumerist approach to learning from students, as it was the first year in which increased fees of up to £9000 were charged by higher education providers
- an increase in UK transnational education
- changes to the regulatory environment, with the publication of the Operating framework for higher education in England in July 2013.

A significant development for QAA was the move towards a common review method. Higher Education Review (HER) represents a significant milestone in QAA's review activities. It is a common review method for all subscribers to QAA, as well as non-QAA subscribers with access to HEFCE funding. Within the academic year 2013-14, HER will also be applied to new applicants for educational oversight (private colleges wishing to apply for permission to recruit students from outside the European Union) and, over the next few years, it is intended that all whole-institution reviews will adopt the HER method.

# **Part 1: Meeting contractual requirements**

## Summary of achievements and exceptions, against the 2012-13 contract

Table 1.1: Achievements against contract 2012-13

Contract reference	Contract requirement	Achievement (✓) or exception (x)
Part A		
Para 26	Attendance at biannual meetings	<b>✓</b>
Para 38	Annual report of QAA's Audit Committee	✓
Paras 39, 40 and 51	Submission of quarterly reports	<b>✓</b>
Paras 48 and 49	QAA annual report to HEFCE	<b>√</b>
Para 50	QAA Directors' report	<b>✓</b>
Para 53c	Presentation to TQSE	✓
Part B		
Para 3a	Schedule of review of higher education in further education colleges	✓
Para 4a	Schedule of institutional review	✓
Para 7	Receive and handle concerns about standards and quality in higher education	<b>✓</b>
Schedules		
4	Complete review of higher education in further education schedule	<b>✓</b>
5	Complete institutional review schedule	✓

#### 1.1 Reviews

## 1.1.1 Report on review activity

For each review undertaken, QAA is required by HEFCE to publish the review report within 12 weeks of the visit, unless the judgements are eligible for appeal. QAA monitors delivery against the 12 week deadline in real time on its management performance dashboard, for all review methods. Table 1.2 shows year-on-year percentage publication of reports to schedule.

Table 1.2: Publication of reports to schedule (year-on-year)

	YE 2010-11	YE 2011-12	YE 2012-13
Publication of reports			
(% to schedule)	93%	100%	97%

QAA was contracted to conduct 39 reviews in 2012-13, of which:

- 37 have led to published reports
- two were set aside and rescheduled.

Of the 37 published review reports:

- 36 reports were published on time
- one report was published one week after the contractual deadline, due to an unusually complex provider response to the draft report, to which the review team required an additional week to consider and respond. HEFCE was notified of the circumstances, before the deadline.

#### 1.1.2 Action plans

All providers whose review reports were published by QAA have also published their own action plans in line with the timescales required by their review method, with the exception of one provider whose action plan is not yet due.

#### 1.1.3 Higher Education Review

On 6 November 2012, QAA received guidance from HEFCE on implementing a more risk-based approach to quality assurance. This led to a QAA consultation on the details of a new method, Higher Education Review (HER), in spring 2013 and the publication of the HER handbook in June. The review programme has begun and the first review visits will take place in February 2014.

## 1.1.4 Institutional Review England and Northern Ireland

In September 2011, Institutional Review England and Northern Ireland (IRENI) replaced Institutional Audit (IA) as the review process for institutions in England and Northern Ireland.

<sup>&</sup>lt;sup>1</sup> In respect of the review methods which QAA conducts on HEFCE's behalf, QAA's Consolidated Appeals Procedure allows for appeals to be made against finalised reports containing one or more 'Does not meet UK expectations' or 'Requires improvement' judgements. Providers in receipt of such judgements are given four weeks in which to appeal. If they elect not to appeal, the report is published 16 weeks after the review visit. If they appeal, the fate of the report rests on the outcome of that appeal.

2012-13 was the second year of IRENI. It also marked a significant methodological development from the previous year: the introduction of a formal judgement on information about learning opportunities (based on the corresponding Part C of the Quality Code). In 2012-13, therefore, institutions undergoing IRENI were subject to four judgements on:

- i) threshold academic standards
- ii) quality of student learning opportunities
- iii) enhancement of student learning opportunities
- iv) information about learning opportunities.

There were 22 IRENI reviews of HEFCE-funded providers during 2012-13.<sup>2</sup> Outcomes for 20 of those reviews were as follows (see Table 1.3):

- 13 judgements of 'Meets UK expectations' in all four areas
- one judgement of 'Does not meet UK expectations' in threshold standards made under collaborative arrangements; judgement of 'Meets UK expectations' in the other areas<sup>3</sup>
- one judgement of 'Requires improvement' in enhancement and 'Meets UK expectations' in the other areas
- five judgements of 'Commended' in one area and 'Meets UK expectations' in the others:
  - three of the 'Commended' judgements were in enhancement
  - one 'Commended' judgement in information
  - one 'Commended' judgement in quality of learning opportunities.

Table 1.3: IRENI outcomes (2012-13)

	Threshold academic standards	Quality of student learning opportunities	Enhancement of student learning opportunities	Information about learning opportunities
Meets UK expectations	19	19	18	19
Does not meet UK expectations	1	0	0	0
Is commended	N/A <sup>4</sup>	1	1	1
Requires improvement to meet UK expectations	N/A	0	1	0
Totals	20	20	20	20

The remaining two reviews were set aside:

one owing to a successful appeal by the provider against an unsatisfactory judgement

 one following representations made by the provider before a final review report was produced.

<sup>2</sup> In addition, QAA conducted one IRENI in order to help HEFCE determine if the provider could be designated for funding purposes. The outcome of this review is confidential and not included in this analysis.

<sup>&</sup>lt;sup>3</sup> This was a split judgement. The review team concluded that the threshold academic standards of the provider's own provision met UK expectations, but the standards of the awards it made under collaborative arrangements did not.

<sup>&</sup>lt;sup>4</sup> There were only two judgements available for threshold academic standards: 'meets UK expectations' or 'does not meet UK expectations'.

QAA has considered the implications of both set aside cases very carefully and made a number of changes in response (see Section 1.3 Appeals for further details).

Both providers in receipt of unsatisfactory judgements were able to demonstrate that they had successfully addressed the review team's recommendations, well within the required timescale of 12 months. Their judgements have now been formally amended to 'Meets UK expectations' and the reviews signed off as complete.

#### Comparing IRENI and Institutional Audit judgements

Comparisons present challenges, as the process used to arrive at judgements is substantively different between IRENI and Institutional Audit (IA), and the judgement categories themselves have changed. If some simplifications are made - only standards and quality will be considered - then a broad brush picture can be presented.

#### Standards judgements:

- meets expectations/confidence
- does not meet expectations/fails to achieve confidence.

## Quality judgements:

- meets expectations/confidence
- requires improvement to meet expectations/fails to achieve confidence.<sup>5</sup>

Table 1.4 shows the number of institutions meeting UK expectations (IRENI) or achieving confidence judgements (IA) in relation to standards, against the total number of institutions reviewed. The remainder did not meet UK expectations (IRENI) or failed to achieve a judgement of confidence (IA).

Table 1.4: Comparison of IA and IRENI judgements: standards (2008-13)

	2008-09 (IA)	2009-10 (IA)	2010-11 (IA)	2011-12 (IRENI)	2012-13 (IRENI)
Meets UK expectations (IRENI) or achieves a confidence judgement (IA)	37/40	28/30	25/27	13/13	19/20

Table 1.5 shows the number of institutions meeting UK expectations (IRENI) or achieving confidence judgements (IA) in relation to quality, against the total number of institutions reviewed. The remainder did not meet UK expectations (IRENI) or failed to achieve a judgement of confidence (IA).

Table 1.5: Comparison of IA and IRENI judgements: quality (2008-13)

	2008-09 (IA)	2009-10 (IA)	2010-11 (IA)	2011-12 (IRENI)	2012-13 (IRENI)
Meets UK expectations (IRENI) or achieves a	38/40	30/30	26/27	11/13	20/20

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<sup>&</sup>lt;sup>5</sup> The term 'fails to achieve confidence' is used in this context to denote limited confidence of any kind and no confidence.

confidence judgement			
(IA)			

## **Comparing IRENI and Institutional Audit recommendations**

Again, some simplification is needed for a comparison of IRENI and Institutional Audit recommendations, as neither were designed to allow comparisons between providers on the basis of the number of recommendations produced. Given that, however, IRENI (2012-13) resulted in more recommendations per review than in the previous year, but fewer than was the case in Institutional Audit (see Table 1.6).

Table 1.6: Numbers of IA and IRENI recommendations (2008-12)

	2008-09 (IA)	2009-10 (IA)	2010-11 (IA)	2011-12 (IRENI)	2012-13 (IRENI)
Desirable	121 (3.0)	88 (2.9)	91 (3.4)		
Advisable	104 (2.6)	100 (3.3)	100 (3.7)	52 (4.0)	109 (5.5)
Essential	5 (0.1)	2 (0.1)	3 (0.1)		
Total reviews	40	30	27	13	20

<sup>\*</sup>Note: the figures in () denote the mean number by review - recommendations are not categorised in IRENI.

#### 1.1.5 Review of College Higher Education

In September 2012, Review of College Higher Education (RCHE) replaced Integrated Quality and Enhancement Review (IQER) as the review process for further education colleges providing higher education in England.

The RCHE method aligns closely with IRENI, which represents a significant development from IQER, particularly in relation to student involvement and the calibration of the judgements, recommendations and other outcomes against the Expectations of the Quality Code.

During 2012-13, there were 12 RCHE reviews, with outcomes given in Table 1.7.

Table 1.7: Review of College Higher Education outcomes (2012-13)

	Threshold academic standards of awards offered on behalf of awarding bodies	Quality of student learning opportunities	Enhancement of student learning opportunities	Information about learning opportunities
Meets UK expectations	12	10	8	8
Does not meet UK expectations	0	0	1	0
Is commended	N/A <sup>6</sup>	1	1	1
Requires improvement to meet UK expectations	N/A	1	2	3
Totals	12	12	12	12

Three providers received unsatisfactory judgements and are currently in the process of addressing the issues underlying those judgements, pursuant to the published method.

#### Comparing RCHE and IQER judgements

Again, comparisons with previous years present challenges - due to the different processes used to arrive at judgements and the different categories used in RCHE and IQER - but can be achieved by comparing only standards, quality and information, and by using just two categories for summarising judgements.

Table 1.8 shows the number of providers meeting UK expectations (RCHE) or achieving confidence judgements (RCHE) in relation to standards, against the total number of providers reviewed. The remainder did not meet UK expectations (RCHE) or failed to achieve a judgement of confidence (IQER).

Table 1.8: Comparison of RCHE and IQER judgements: standards (2011-13)

	2011-12 (IQER)	2012-13 (RCHE)
Meets UK expectations (RCHE) or achieves a confidence judgement (IQER)	81/83	12/12

Table 1.9 shows the number of providers meeting UK expectations (RCHE) or achieving confidence judgements (RCHE) in relation to quality, against the total number of providers reviewed. The remainder did not meet UK expectations (RCHE) or failed to achieve a judgement of confidence (IQER).

Table 1.9: Comparison of RCHE and IQER judgements: quality (2011-13)

	2011-12 (IQER)	2012-13 (RCHE)
Meets UK expectations (RCHE) or achieves a confidence judgement (IQER)	82/83	11/12

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<sup>&</sup>lt;sup>6</sup> There were only two judgements available for threshold academic standards: 'meets UK expectations' or 'does not meet UK expectations'.

Table 1.10 shows the number of providers meeting UK expectations (RCHE) or achieving confidence judgements (RCHE) in relation to public information, against the total number of providers reviewed. The remainder did not meet UK expectations (RCHE) or failed to achieve a judgement of confidence (IQER).

Table 1.10: Comparison of RCHE and IQER judgements: public information (2011-13)

	2011-12 (IQER)	2012-13 (RCHE)
Meets UK expectations (RCHE) or achieves a confidence judgement (IQER)	82/83	9/12

It appears that colleges are facing greater challenges in the area of information now than in previous years. This is perhaps unsurprising, given the heightened demands in this area in Part C of the Quality Code (see also the section on 'Looking Ahead' for future areas for development).

#### **Comparing RCHE and IQER recommendations**

Again, simplifications have been made to enable comparison between the two methods. In that context, RCHE in 2012-13 resulted in an average of about 1.5 more recommendations per review than IQER in its final year, but a similar number to IQER between 2008 and 2011 (see Table 1.11).

Table 1.11: Numbers of recommendations in further education colleges, 2008-13

	2008-09	2009-10	2010-11	2011-12	2012-13
Desirable	79 (3.29)	244 (3.70)	259 (3.45)	242 (2.91)	
Advisable	48 (2.00)	128 (1.94)	137 (1.82)	114 (1.37)	79 (6.6)
Essential	2 (0.08)	5 (0.08)	1 (0.01)	5 (0.06)	
Total reviews	24	66	75	83	12

Note: the figure in () denotes the mean number by review. Recommendations are not categorised in RCHE.

#### **Comparing RCHE and IRENI**

Significantly, the alignment of IRENI and RCHE allows comparisons to be drawn between the outcomes of reviews of institutions and further education colleges in 2012-13, although some caution is required in interpretation, given the different activities and responsibilities of these two types of providers. For instance, higher education institutions generally have degree-awarding powers and are therefore responsible for the standards of their own awards, whereas most further education colleges offer higher education programmes on behalf of awarding bodies.

#### 2012-13 comparisons:

- 14.5 per cent of RCHE judgements were unsatisfactory (either 'Does not meet UK expectations' or 'Requires improvement'), compared with 2.5 per cent of IRENI judgements
- 6 per cent of RCHE judgements were 'Commended' the same proportion as in IRENI

- the mean average number of recommendations in IRENI and RCHE were 5.1 and
   6.6 respectively
- no institution had 'Commended' judgements in more than one area, whereas one further education college received two 'Commended' judgements
- one further education college was the first provider of either type to receive a 'Commended' judgement for the quality of student learning opportunities.

The judgements in RCHE for further education colleges, therefore, exhibit a greater proportion of unsatisfactory judgements and about the same proportion of commended judgements than those in IRENI for higher education institutions. This can be interpreted both from the perspectives of assurance and concern. It demonstrates that colleges are capable of achieving comparable (and sometimes better) outcomes, compared with higher education institutions. It also suggests that, as the new method of Higher Education Review rolls out to both institutions and colleges, a significantly higher proportion of unsatisfactory outcomes might be expected amongst colleges. The experience of RCHE in 2012-13 indicates a correlation between institutional familiarity with (or memory of) QAA processes and positive review outcomes. Heightening the awareness of colleges of QAA's role and approach is clearly an area for further attention in the future (see also the section on 'Looking Ahead').

#### 1.1.6 Initial Review

In September 2012, QAA introduced a new method, Initial Review, for reviewing higher education provided by colleges which received student places from the Higher Education Funding Council for England (HEFCE) for 2012-13, and which did not undergo IQER.

The method is based heavily on RCHE, but the judgements were not summative because aspects of the colleges' provision (for example, arrangements for student assessment) were not likely to have been put into effect by the time of review. The review teams made judgements on the likelihood that the colleges' policies and procedures would meet UK expectations in the areas of threshold academic standards, quality of student learning opportunities and quality of information.

During 2012-13, there were five Initial Reviews. All resulted in judgements of 'Is likely to meet UK expectations' in all areas. There were 35 recommendations in aggregate (unclassified, as in IRENI and RCHE) - a mean average of 7 recommendations per review. There is one Initial Review scheduled for 2013-14.

#### 1.1.7 QAA reviewer survey

In autumn 2012, QAA conducted a survey of its reviewers, which attracted a 50 per cent response rate. The survey questions reflected those asked of QAA's own staff in an earlier exercise, allowing for comparisons between the two groups. The findings of the reviewer survey were generally positive and more positive than the findings for staff.

Reviewers gave particularly emphatic responses around training:

- 97 per cent strongly agreed or agreed with the statement 'I have received the training I need to carry out my role effectively'
- 96 per cent strongly agreed or agreed with the statement 'I am confident I have the skills I need to carry out my role'.

Similarly strong responses were given around perceptions of QAA:

 95 per cent strongly agreed or agreed with the statement, 'QAA conducts its activities with honesty and integrity'.

The two lowest scores were concerned with performance management and management:

- only 37% strongly agreed or agreed with the statement, 'High performance is recognised by QAA'
- only 35% were in agreement with the statement, 'QAA management considers my interests when making important decisions'

The section 'Looking Ahead' later in this report provides details of QAA's action taken in response to this survey.

## 1.1.8 2013 Annual Reviewer Conference

In April 2013, QAA held its inaugural Annual Reviewer Conference at the University of Warwick. The aims of the conference were to provide reviewers with opportunities to develop their knowledge and skills, and to contribute to QAA policy development (for example, on the Higher Education Review method). The conference also gave an opportunity for QAA to communicate key information and messages to the reviewer body. Around 220 reviewers attended the 2013 conference. Guest speakers included representatives from the universities of Warwick and Oxford, Cleveland College of Art & Design and the National Union of Students. Delegate evaluations of the event were mostly positive, with 13 of the 16 sessions judged to be 'useful' or 'very useful' by at least 90 per cent of respondents.

The second Annual Reviewer Conference will be held at the University of Leeds in June 2014.

## 1.2 Appeals

In March 2012, the QAA Board approved a revised process for the consideration of appeals against QAA review judgements. This revised process was initially applied to judgements resulting from educational oversight reviews, but was extended to cover all review methods from January 2013.

During 2012-13, three HEFCE-commissioned reviews were subject to appeal. The first related to a 'Requires improvement' judgement on the quality of student learning opportunities in collaborative provision. This appeal was not upheld. The second related to two 'Requires improvement' judgements in the areas of information and enhancement and was also not upheld. The third related to a 'Does not meet' judgement on UK threshold academic standards. This appeal was upheld. Where appeals have been upheld, the reasons are considered and action taken in response to the issues identified. Further details of the actions taken in response to this critical self-evaluation of performance are provided in paragraph 2.6.

#### 1.3 Concerns

#### 1.3.1 Report on concerns about standards and quality in higher education

The number of cases considered under QAA's Concerns Scheme continued to grow during 2012-13, as illustrated in Figure 1.1. Given that considerable effort has been put into

promoting the Concerns Scheme and the increasingly prominent place it has among the tools of external quality assurance, this increase is a positive development.

Concerns scheme cases per year 120 105 100 80 58 60 42 40 24 20 0 2009-10 2010-11 2011-12 2012-13

Figure 1.1: Concerns Scheme cases per year

In 2012-13 QAA handled 105 new cases under the concerns about standards and quality scheme. This comprised 87 submissions to scheme, and 18 cases initiated by QAA based on intelligence from other agencies, or gathered through reviews of providers' partners, representing an 87 per cent increase in cases between 2011-12 and 2012-13. QAA also handled 570 email and phone enquiries relating to the scheme in during the same year.

Of the 105 cases in 2012-13:

- 98 related to providers in England, six related to providers in Wales, and one related to a provider in Northern Ireland
- 88 related to universities, 14 to alternative providers, and two to colleges of higher education. One related to a provider that does not subscribe to QAA and was referred to Ofgual.

#### 1.3.2 Outcomes from the Concerns Scheme (2012-13)

In 2012-13, 58 of the 98 Concerns Scheme cases proceeded to the initial inquiry stage. These 58 cases have led to the actions noted in Table 1.12.

Table 1.12: Concerns Scheme actions

Actions	Number of cases
Moved to full investigation	1 (report published in 13-14)
Provider acknowledged weaknesses identified by the initial inquiry and agreed actions with QAA to address concerns	5
Concern referred to forthcoming QAA review	2
Positive action by provider (i.e. to resolve an individual issue for a student or to amend student information) in response to QAA's initial inquiry	13

Of the remaining 38 cases, there are eight ongoing inquiries where QAA is waiting for a response from the provider. There are also five extended initial inquiries where QAA is awaiting further information from the applicant and 16 cases where no further action is required from the provider.

Of the 105 cases considered by QAA in 2012-13, 80 have been closed and 25 are continuing in 2013-14.

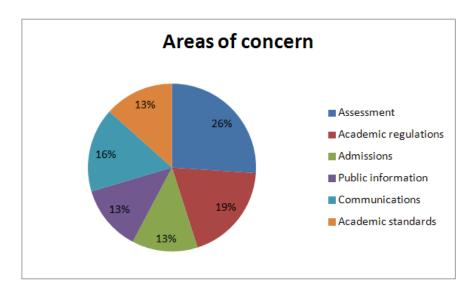
QAA also published three full investigation reports in 2012-13 on investigations conducted in 11-12:

- St Mary's University College (London) and the Brief Strategic Therapy and Clinical Hypnosis Foundation
- University of Gloucestershire and Williams College
- Business and Finance.

#### 1.3.3 Key themes and patterns identified in 2012-13

Figure 1.2 shows the main areas and themes identified as concern from the 98 cases. Many cases identified more than one area or theme as a concern.

Figure 1.2: QAA Concerns Scheme main areas of concern



Other areas identified, but with fewer than ten cases each, include:

- discrimination
- learning opportunities
- teaching qualifications
- learning resources.

Submissions received in 2012-13 were from students including graduates (56), members of the public (22), employees of providers (five), parents (three), and external examiners (one).

A significant proportion of cases related to the provision of higher education with others: 29 cases and 28 per cent. These cases focused on the awarding bodies' management of provision, and not on the partner providers. Nine of these cases focused on concerns about transnational education.

#### **Future directions of the Concerns scheme**

The number of cases is dependent on the number of submissions to the concerns scheme, and as such it is a reactive review method that cannot be easily planned or scheduled. The number of submissions to the Concerns Scheme continues to increased year on year, with an 80 per cent increase this year and a four-fold increase in the last four years (see Table 1). During 2012-13 eight Case Officers worked regularly, and three case officers worked occasionally on the scheme, though none full time.

To ensure the team has capacity to respond to each submission it has trained a wider pool of case officers. A further seven occasional Case Officers, drawn from existing Assistant Directors and Development Officers, have been trained for 2013-14. The introduction of Case Officer meetings every six weeks will allow officers to share expertise, moderate their approaches, and be updated on developments affecting the method and working practices.

## 1.4 Quality Code

## 1.4.1 Consultation and publication in 2012-13

The Quality Code comprises:

- Part A: 'Setting and maintaining threshold academic standards'
- Part B: 'Assuring and enhancing academic quality'
- Part C: 'Information about higher education provision'.

During 2012-13, the following chapters of the Quality Code were published, together with a revised version of the 'General Introduction', which serves as a technical introduction for users of the Quality Code.

Chapter B10: Managing higher education provision with others

This Chapter was published in December 2012, following a consultation process which received 113 responses. It is designed to reflect the diversity of arrangements through which higher education is provided when working with other organisations, such as higher education providers, employers and overseas institutions. It emphasises the importance of proportionate procedures and processes and the assessment of risk in managing such arrangements. The Chapter recognises that a 'one size fits all' approach to the development,

<sup>&</sup>lt;sup>7</sup> Now 'Setting and maintaining academic standards' (as of October 2013)

approval and management of arrangements for delivering learning opportunities with others is neither sufficient nor appropriate, while stressing that such flexibility can be achieved without undermining the broad principles that underpin the assurance of academic standards and quality.

#### Chapter B4: Enabling students' development and achievement

This Chapter was published in March 2013, following a consultation process which received 90 responses. It addresses the ways in which higher education providers enable students to develop and achieve their academic, personal and professional potential. The underpinning approach is that all students should be enabled to develop their potential and engage in their learning, and that such provision should not be targeted solely at students who are identified as at risk of failure. Consequently, the title of the chapter deliberately adopts the term 'enabling' rather than 'supporting' to reflect this.

#### Chapter B9: Academic appeals and student complaints

This Chapter was published in April 2013, following a consultation process which received 120 responses. In developing this Chapter, QAA worked closely with the Office of the Independent Adjudicator and the Scottish Public Services Ombudsman, to ensure it is consistent with their guidelines and procedures. Effective management of academic appeals and student complaints is an essential part of the management of quality and standards in higher education. The existence of robust policies and procedures is of prime interest to students, and contributes to a positive relationship between students, providers and regulators. In addition, appeals and complaints provide a key source of information and feedback to providers, which, if utilised, can promote enhancement of the learning experience.

In addition, the following Chapters, together with Part A, were subject to consultation in 2012-13 and published in the operational year 2013-14. Chapters B1, B6, B8 and Part A address a range of interrelated topics concerned with setting and maintaining academic standards, and assuring and enhancing the quality of learning opportunities. Consequently, work on their development was undertaken at the same time, and a similar number of consultation responses were received for each, as a result.

#### Chapter B1: Programme design and approval

The consultation on this Chapter received 95 responses. It addresses the initial design and development of a programme, and the processes which lead to a decision by the degree-awarding body that it may be delivered in the agreed form.

#### Chapter B2: Recruitment, selection and admission

The consultation on this Chapter received 86 responses. It focuses on the interconnected policies and procedures related to the recruitment, selection and admission of students to higher education. The Chapter offers a framework for assuring quality, and provides guidance to higher education providers and those involved in recruitment, selection and admission.

#### Chapter B6: Assessment of students and recognition of prior learning

The consultation on this Chapter received 95 responses. It deals with the assessment of student learning: both learning which is achieved as part of a defined programme offered by a higher education provider and learning at the equivalent level achieved outside the defined

programme of study. The Chapter covers all forms of assessment used in the context of taught provision and for the recognition of prior learning.

Chapter B8: Programme monitoring and review

The consultation on this Chapter also received 95 responses. It discusses the mechanisms which higher education providers use to reflect on a programme once it is running and to determine how it can be improved. The Chapter also addresses matters relating to closure of existing programmes.

Part A: 'Setting and maintaining academic standards'

The consultation on Part A received 95 responses. Publication of Part A and Chapters B1, B2, B6 and B8 completed the two year programme to restructure the Quality Code.

#### 1.4.2 Application of the Quality Code to review methods

QAA's Research, Development and Partnerships Group continues to work closely with colleagues in Reviews Group to ensure the alignment between the developing content of the Quality Code, as a UK-wide reference point, and each review method.

With the introduction of the more risk-based method of quality assurance (HER), the expectations and indicators of the Quality Code will be particularly important in informing the judgements of reviews. This represents a more explicit alignment of external reference points with the outcomes of institutional review (see also Section 1.2 above, where the need to demonstrate as closely as possible the relationship between the Quality Code and reviewers' judgements was a factor in an appeal from an institution).

#### 1.4.3 Dissemination

The Quality Code is necessarily a web-based entity, to enable frequent updating. Work continues to enhance its accessibility through the development of an interactive online platform. *The UK Quality Code for Higher Education: a brief guide* also continued to be popular during 2012-13, with over 6,000 copies distributed.

A variety of opportunities have been exploited to disseminate the Quality Code to audiences including students, reviewers and other key stakeholders. A range of dissemination events took place in 2012-13, including:

November 2012 - a launch event was held in Manchester to mark the publication of *Chapter B3: Learning and teaching*, and *Chapter B5: Student engagement* of the Quality Code. The event drew together themes common to both Chapters and provided opportunities for the sharing of practice, and was attended by 100 delegates from across the UK sector.

April 2013 - an event entitled 'New challenges, new solutions: doctoral partnerships' was held at the University of Exeter. Attended by 80 delegates from higher education and industry, it provided an opportunity to share ideas, experiences and potential solutions to the challenges faced when creating, developing and enhancing research education partnerships. This included consideration of the implications of *Chapter B10: Managing higher education provision with others* of the Quality Code.

April 2013 - the Royal Welsh College of Music & Drama hosted the event 'Managing higher education provision with others: development of the Quality Code Chapter B10 and its

application in quality assurance and enhancement'. This event was attended by 37 delegates and focused on ideas, experiences and potential solutions to the challenges faced when engaging in collaborative provision. This included consideration of the implications of *Chapter B10: Managing higher education provision with others*.

July 2013 - an event entitled 'New challenges, new solutions: the quality assurance of placements' was held at the University of Hertfordshire. It was attended by 102 delegates and focused on experiences and potential solutions to the challenges faced when providing various forms of placement learning. This included consideration of the implications of *Chapter B10: Managing higher education provision with others*.

July 2013 - Manchester Metropolitan University was the venue for 'New challenges, new solutions: partnerships for higher apprenticeships', attended by 50 delegates from higher education, sector skills councils and funders of higher apprenticeships. The event focused on the design, delivery and quality assurance of higher apprenticeships.

## 1.5 Student engagement

#### 1.5.1 Maximising the impact of student engagement activities

During 2012-13, QAA continued to engage students actively as informed and constructive partners in shaping and developing quality assurance, and the enhancement of higher education. In order to maximise impact, avoid duplication and align activities with those of other agencies, QAA structured its work in 2012-13 around four priority areas:

- i) Ensuring QAA's work has student needs at its heart
- ii) Supporting institutions, students and students' unions
- iii) Supporting and extending student involvement in reviews
- iv) Communicating effectively with students.

Work in these four areas is described below, along with a qualitative impact assessment. This work has also been shared with partners, the Higher Education Academy (HEA), National Union of Students (NUS) and HEFCE, in a series of joint meetings. In addition, QAA contributed to a mapping exercise, led by NUS, to ensure work was not being duplicated. In part as a result of these discussions, the proposal to create the new Student Engagement Partnership emerged.

#### 1.5.2 Ensuring QAA's work has student needs at its heart

During 2012-13, QAA launched its new Student Advisory Board (SAB). The SAB is a formal advisory committee of the QAA Board, charged with helping ensure QAA meets its strategic aim relating to students. The SAB had an immediate impact on the work of QAA, including recommending 'employability' as a theme for the new Higher Education Review method and that QAA should revise the way review outcomes are communicated, so they are more accessible for a student audience. Both recommendations are being taken forward.

There were over 600 examples of students playing a material role in QAA's work over the 2012-13 period. These included:

- attending QAA events or QAA sessions at other events and development conferences, for example:
  - 50 students attended a workshop about QAA and quality assurance at the NUS Students' Unions 2013 Conference

- 20 students attended a workshop about QAA's and HEA student engagement activities
- 45 students attended a session on QAA's student engagement work during the NUS Wales course representative training
- 15 student reviewers attended QAA's Reviewer Conference
- 12 students engaged with QAA's Student Advisory Board
- 65 students attended QAA's Annual Conference
- 15 students participated in QAA's Annual Reception in Cardiff
- involvement in QAA reviews as student reviewers and lead student representatives (LSRs):
  - 86 student reviewers are now in QAA's reviewer pool
  - 40 LSRs were briefed by QAA on IRENI/RCHE/HER
  - 23 LSRs were briefed by QAA on Review for Education Oversight
  - 8 LSRs were briefed by QAA on Review of Foundation Degrees in Wales
  - 6 LSRs were briefed by QAA on Institutional Review (Wales).

Examples of the impact of this work can be seen in:

- changes to the way QAA trains student reviewers with the introduction of a new student review focussed introductory training session
- supporting LSRs through the bringing together of LSRs from across the country for a briefing and support day in partnership with the NUS
- developing new guidance that more accurately reflects student needs
- the development of an online tool to facilitate direct feedback from students into reviews.

It is vital that QAA's work in student engagement and student interest, and more broadly, continues to be underpinned by robust evidence about what students need. To that end, in 2012-13, QAA commissioned two research reports from external research teams at the University of Bath and King's College London. The University of Bath research investigated student engagement in learning and teaching quality management. The King's College research explored students' perceptions and expectations regarding quality and standards in higher education.<sup>8</sup>

#### 1.5.3 Supporting institutions, students and students' unions

In 2012-13, QAA delivered two national conferences designed to help meet this priority.

In October 2012, the Quality Matters event was aimed at students and student union representatives new to quality assurance and enhancement, to introduce them to key issues in this area. The event attracted over 100 participants, was attended by David Willetts, Minister for Universities and Science, and trended nationally on Twitter. Participants were surveyed before and after the event to establish whether it had an impact - the survey showed that 95 per cent of respondents felt better informed after attending the event and participants reported their understanding of topics such as QAA reviews and the Quality Code had improved significantly.<sup>9</sup>

In May 2012, QAA held a Developing Student Engagement event, bringing together two communities central to supporting effective student engagement in institutions: student union staff and quality managers. The event attracted 150 delegates and was well received, with

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<sup>&</sup>lt;sup>8</sup> Reports for both projects were published in autumn 2013.

<sup>&</sup>lt;sup>9</sup> For example, scores for knowledge of the Quality Code improved before and after the event, from an average of 5 to an average of 8 (where 1 = no understanding and 10 = full understanding).

88 per cent of those responding to the evaluation agreeing that the event would have, or already had, a positive impact on their work.

QAA also worked in strategic partnership with NUS, providing funding through a two-year contract to deliver two projects.

- The first project is to support student unions in developing annual quality reports (AQRs), as a basis for improving the student experience. AQRs are formal reports from the student body submitted to their institution, which explore key issues relating to the quality of education. NUS has worked during the first year of the project with 16 students' unions to develop these reports. At the time of writing, progress across the 16 unions is variable: there has been one withdrawal, but the remainder are committed to developing this process.
- The second project is to support staff working on student engagement, with a
  variety of staff development materials and events including workshops, an online
  learning module for new starters and action learning sets for advanced
  practitioners. The first year of this project has been focused on conducting training
  needs analysis and developing content for the course.

#### 1.5.4 Support and extend student involvement in review activities

Engaging students with QAA review activities is central to QAA's work in this area.

Students engage with review methods in a variety of ways. QAA has over 80 student reviewers who are full and equal members of review teams. In the last year, QAA has also extended the use of student reviewers to the new method for Review of Specific Course Designation, as well as developing additional training to meet the specific needs of student reviewers across all review methods.

Another important way in which students engage with QAA reviews is through the role of the lead student representative (LSR) and in the formal submission that students make to reviews. Along with extensive ad hoc support for students contributing to this process, during 2012-13, QAA also delivered support sessions, trialled a new process of briefing days for LSRs and issued new guidance on how to make a student submission through alternative methods such as video and podcast. QAA also issued a wide range of student guidance documents on topics including the role of the LSR, how to compile a student submission and student guides to QAA review methods.

QAA has also extended its work into Access to HE, reaching agreement to include student engagement as a theme in the review of Access Validating Agency, to have students represented on the Access Licensing Committee and the use of students in a number of focus groups to help design the new Access to HE website.

#### 1.5.5. Communicating effectively with students

QAA continues to work to ensure effective communication with students and their representatives, and to build the profile of QAA with this audience. During 2012-13, QAA launched a new social media channel with its student engagement Facebook group, which quickly amassed nearly 500 'Likes' from a wide range of individuals and representative organisations working with students.

Systematic data collection on enquiries calls, to enable QAA to profile callers and to measure trends over time. During 2012-13, around 1300 students called QAA on a range of issues, which represents 35 per cent of all enquiry calls received over the year.

In addition, following the recommendation of the Higher Education Public Information Steering Group, QAA developed four new guidance documents for students addressing a range of issues relating to what they can expect from their time in higher education, such as workload and different approaches to teaching. These are being made widely available through QAA's website, with a link to the Unistats site.

#### 1.5.6 Work with the Student Engagement Partnership

QAA was a member of the cross-sector group that developed the new Student Engagement Partnership Unit (the Unit) and in the smaller working group that helped shape the original NUS proposal. QAA continues as a member of the Unit's Steering Group and remains committed to helping maximise the benefits of its work and to help ensure it makes a meaningful contribution to higher education.

QAA particularly welcomes the decision the Unit has made to focus on supporting student engagement in higher education in further education colleges, which aligns with one of QAA's own priorities.

#### 1.6 Evaluations

#### 1.6.1 Overview

Review evaluations are an important part of QAA's quality assurance processes and a major aspect of QAA's evaluation policy.<sup>10</sup>

In July 2013, QAA made a significant change to the timing of its review evaluations, so that all evaluation questionnaires are now sent out two weeks after the final visit and responses are sought within two weeks of that. This was communicated to the sector in a circular letter, also in July (see Annex A).

#### 1.6.2 IRENI evaluations

Table 1.13 shows the overall evaluation response rates for IRENI in 2011-12 and 2012-13, noting that the table shows the data for review visits rather than for review reports published (as per the circular letter).

The overall response rate for 2011-12 evaluation surveys was 77 per cent, whilst the overall 2012-13 response rate was 88 per cent. The response rate for lead student representatives increased from 21 per cent to 67 per cent.

Table 1.14 shows main messages from IRENI review evaluations in 2012-13.

Table 1.13: IRENI Review evaluation response rates 2011-12 and 2012-13

Role	Sent (2011-12)	Received	Rate	Sent (2012-13)	Received	Rate
Peer Reviewer	37	33	89%	57	52	91%
Secretary	16	13	81%	20	19	95%
Lead Student Representative	14	3	21%	11	7	64%

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<sup>&</sup>lt;sup>10</sup> http://www.gaa.ac.uk/AboutUs/corporate/Policies/Documents/EvaluationPolicy.pdf

Student	16	12	75%	20	16	80%
Reviewer						
Institutional	16	11	69%	20	18	90%
Facilitator						
QAA Officer	16	16	100%	20	20	100%
Totals	115	88	77%	148	130	88%

Table 1.14: Main messages from IRENI review evaluations (2012-13)

#### Extent to which activity met its aims

65% of respondents felt that the activity met its aims completely

33% of respondents felt it achieved them to a large extent

2% of respondent felt it achieved them to some extent

(Based on 58 respondents from all respondent groups)

#### QAA officer role

84% of respondents felt that the QAA officer supporting the review performed their role completely effectively

11% of respondents felt the role was performed effectively to a large extent 5% of respondents felt the role was performed effectively to some extent

(Based on 44 respondents from the reviewer and provider respondent groups)

#### Qmmunity review site

35% of respondents felt able to work productively using the review Qmmunity site 56% of respondents felt able to work partially productively using the review Qmmunity site 9% of respondents felt unable to work productively using the review Qmmunity site (Based on 34 respondents from the reviewer respondent group)

#### Performance of role

40% of respondents felt they had performed their role completely effectively 58% of respondents felt they had performed their role effectively to a large extent 2% of respondents felt they had performed their role effectively to some extent (Based on 48 respondents from the reviewer and QAA officer respondent groups)

#### Review team

49% of respondents felt that the review team had performed their roles completely effectively 49% of respondents felt that the review team had performed their roles effectively to a large extent

2% of respondents felt that the review team performed their roles effectively to some extent (Based on 55 respondents from all respondent groups)

#### Handbook and training

82% of respondents felt that the combination of the Handbook and training provided sufficient information for them to act as a reviewer

18% of respondents felt that the combination of the Handbook and training provided partially sufficient information for them to act as a reviewer

(Based on 34 respondents from the reviewer respondent group)

#### 1.6.3 RCHE evaluations

Table 1.15 shows the RCHE evaluation response rates for 2012-13. In relation to the 0 per cent response rate for lead student representatives (LSRs), the lack of LSRs is an issue for higher education in colleges, and relates to a number of structural and circumstantial factors. Often higher education in colleges is undertaken on a part-time basis by more mature students who have work and family priorities, and do not have the time to devote to being a LSR. Additionally, in many colleges support for the collective student voice, either through a well resourced union or through institutional staff such as a higher education manager, is not limited and therefore hinders the process of finding and supporting a LSR.

Table 1.15: RCHE evaluation response rates (2012-13)

Respondent type	Sent	Received	Rate
Institutional facilitators	12	11	92%
Lead student representatives	1	0	0%
Peer reviewers	25	25	100%
Student reviewers	12	11	92%
QAA officers	14	14	100%
Totals	64	61	95%

Supporting student engagement in college higher education is a priority area for QAA, with plans including new guidance on filling the LSR role and a pilot of a new system of student advisers to help support engagement with review processes. QAA's Student Advisory Board has also identified this as a key issue and changes have been made to its membership to bring in two new representatives from colleges.

Table 1.16 shows the main messages from RCHE evaluations in 2012-13.

Table 1.16: Main messages from RCHE evaluations (2012-13)

Extent to which activity met its aims

65% of respondents felt that the activity met its aims completely

33% of respondents felt it achieved them to a large extent

2% of respondent felt it achieved them to some extent

(Based on 58 respondents from all respondent groups)

QAA officer role

84% of respondents felt that the QAA officer supporting the review performed their role completely effectively

11% of respondents felt the role was performed effectively to a large extent 5% of respondents felt the role was performed effectively to some extent (Based on 44 respondents from the reviewer and provider respondent groups)

Qmmunity review site

35% of respondents felt able to work productively using the review Qmmunity site 56% of respondents felt able to work partially productively using the review Qmmunity site 9% of respondents felt unable to work productively using the review Qmmunity site (Based on 34 respondents from the reviewer respondent group)

#### Performance of role

40% of respondents felt they had performed their role completely effectively 58% of respondents felt they had performed their role effectively to a large extent 2% of respondents felt they had performed their role effectively to some extent (Based on 48 respondents from the reviewer and QAA officer respondent groups)

Review team

49% of respondents felt that the review team had performed their roles completely effectively

49% of respondents felt that the review team had performed their roles effectively to a large extent

2% of respondents felt that the review team performed their roles effectively to some extent (Based on 55 respondents from all respondent groups)

Handbook and training

82% of respondents felt that the combination of the Handbook and training provided sufficient information for them to act as a reviewer

18% of respondents felt that the combination of the Handbook and training provided partially sufficient information for them to act as a reviewer

(Based on 34 respondents from the reviewer respondent group)

#### 1.6.4 Initial Review evaluations

Table 1.17 shows Initial Review evaluation response rates for 2012-13 and Table 1.18 shows main messages from the surveys.

Table 1.17: Initial Review evaluation response rates (2012-13)

Respondent type	Sent	Received	Rate
Institutional facilitators/HOI	5	4	80%
Lead student representatives	1	0	0%
Peer reviewers	11	10	91%
Student reviewers	5	4	80%
QAA officers	7	7	100%
Totals	29	25	86%

Table 1.18: Main messages from Initial Review evaluations (2012-13)

Extent to which activity met its aims

58% of respondents felt that the activity met its aims completely

33% of respondents felt it achieved them to a large extent

9% of respondents felt it achieved them to some extent

(Based on 24 respondents from all respondent groups)

QAA officer role

94% of respondents felt that the QAA officer supporting the review performed their role completely effectively

6% of respondents felt the role was performed effectively to a large extent

(Based on 18 respondents from the reviewer and provider respondent groups)

Qmmunity review site

36% of respondents felt able to work productively using the review Qmmunity site 36% of respondents felt able to work partially productively using the review Qmmunity site 28% of respondents felt unable to work productively using the review Qmmunity site (Based on 14 respondents from the reviewer respondent group)

Performance of role

57% of respondents felt they had performed their role completely effectively 43% of respondents felt they had performed their role effectively to a large extent (Based on 21 respondents from the reviewer and QAA officer respondent groups)

Review team

60% of respondents felt that the review team had performed their roles completely effectively

28% of respondents felt that the review team had performed their roles effectively to a large extent

12% of respondents felt that the review team performed their roles effectively to some extent (Based on 25 respondents from all respondent groups)

Handbook and training

78% of respondents felt that the combination of the Handbook and training provided sufficient information for them to act as a reviewer

14% of respondents felt that the combination of the Handbook and training provided partially sufficient information for them to act as a reviewer

8% of respondents felt that the combination of the Handbook and training did not provide sufficient information for them to act as a reviewer

(Based on 14 respondents from the reviewer respondent group)

## 1.7 Equality and diversity

### 1.7.1 Report on equality and diversity

QAA published its Single Equality Scheme and action plan in July 2011. Since that time, QAA has continued to make good progress in implementing the action plan, with relevant activities to address all our objectives either underway or completed.

#### 1.7.2 Recruitment and selection processes

QAA now requests equality monitoring data, including sexuality and religion, as part of the recruitment applications. The data will be reviewed at the end of the operating year so that any potential inconsistencies can be picked up and relevant action taken. QAA has also asked all staff to supply this data and over half have responded to date.

An impact assessment on the recruitment process was carried out in 2013. This identified some areas where actions may improve equality outcomes in relation to recruitment and selection, such as anonymising of job application forms, increased use of equality statements in recruitment literature, and greater promotion of QAA and the jobs and careers it offers. A number of recommendations were agreed as a result of the assessment (see Annex B) and will be put into operation during 2013-14.

#### 1.7.3 Investors in People

QAA achieved Silver status in its 2013 Investors in People assessment. The final report found that QAA continues to be a values-based organisation and, concerning QAA's capacity for planned improvements said:

'You are strong on self-review using a range of mechanisms to determine performance - staff survey, asking for feedback in all staff and team meetings, monitoring work that is produced and its calibre, a robust cycle of internal audits, and engagement with the European Network for Quality Assurance.'

With regard to recruitment, the review found that the process was viewed as structured, fair and, on the whole, effective in appointing talented people:

'Even those who had been unsuccessful in their application believe that your recruitment and selection process is fair'.

The Investors in People review also found that QAA's commitment to equality remains strong, although QAA could be better at letting staff know what actions are being taken in this area.

#### 1.7.4 Staff data

Full data on QAA's staff is given in the Human Resources and Organisational Development annual report presented to the Board of Directors.

# Part 2: Analysis and commentary on policy issues and QAA processes

This section provides a critical analysis and commentary on the current policy issues in higher education in England, organised as follows.

- Emergent trends and themes.
- Impact of review activities.
- Developments in Higher Education Review.
- Assessment of risks and challenges posed by the change to Higher Education Review, and the capacity of QAA to manage these.
- Commentary on QAA processes.

## 2.1 Emergent themes and trends

The critical analysis and commentary in this annual report should be set against a policy background in which a more diverse and differentiated higher education sector is emerging, with a growth in alternative providers and college higher education. There has also been an increase in the level of UK transnational education (TNE), with concerns expressed in the media about confidence in the standards of TNE, both in UK institutions operating overseas and in international institutions operating in the UK.

2012-13 was the first year in which some students paid increased fees of up to £9000, prompting a more consumerist approach to their learning as evidenced in recently published research commissioned by QAA.<sup>11</sup>

This consumerist approach was also in evidence in the analysis of student submissions as part of IRENI in 2011-12, in the QAA report, *What students think of their higher education experience* (November 2013). This approach was accompanied by an awareness of the range of factors influencing the total learning experience, and the report found that the opportunity for interactions with teaching and support staff were regarded as the most important aspect of a high quality learning experience.

Generally speaking, the demographics of the student population in 2012-13 present a complex and mixed picture following the funding reforms, with initial findings indicating the following.

- A drop in full-time undergraduate numbers, with 47,000 fewer students starting courses in 2012-13.
- A significant decline in part-time student numbers at undergraduate and postgraduate levels.
- Full-time postgraduate recruitment numbers maintained a steady position.
- Numbers of international students continued to grow, with a 9 per cent increase in applications from outside the European Union to commence study in 2013-14.

In a system of risk-based quality assurance, this potential for volatility in student numbers, with the concomitant effect on institutional finances, presents a possible risk indicator regarding financial sustainability. This could have a consequent impact on the learning experience of students. The period in which external quality assurance could be reasonably neutral about the impact of resource on quality could be drawing to a close.

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<sup>111</sup> www.kcl.ac.uk/study/learningteaching/kli/research/student-experience/student-expectations-perceptions-HE.aspx

Turning to the regulatory environment, the Regulatory Partnership Group has now published its Operating framework for higher education in England (July 2013), specifying the administrative means of regulation, whilst recognising that future legislation will be necessary. Significant to QAA operations and strategic planning will be the creation (by HEFCE) of a register of higher education provision, which will provide information about higher education providers in the operating framework.

## 2.2 Impact of review activities

#### **Defining impact**

With the publication of the UK Quality Code for Higher Education<sup>12</sup> (the Quality Code) QAA is now able to consider its activities against the Quality Code Chapters. These are considered as impact areas, which enable a new and improved structure for reporting.

Impact areas relate to the promotion of enhancement by the identification of good practice during the review process (see the Good practice and recommendations section), development by use of appropriate recommendations that have arisen from review (see the Good practice and recommendations section), the provision and implementation of action plans by providers (see the Action plan monitoring section) and public engagement relating to the foregoing.

#### **Good practice and recommendations**

During each review the review team identifies areas of good practice that would be useful to share across the sector. If it is considered that the provider has areas requiring development, the team makes recommendations. Impact areas, based on the Chapters of the Quality Code, are identified by QAA staff attributing features of good practice and recommendations to appropriate Chapters of the Quality Code.

To help foster enhancement QAA developed a Good Practice Knowledgebase<sup>13</sup> and a Recommendations Knowledgebase,<sup>14</sup> both publicly available on the QAA website. Impact areas, based on the chapters of the Quality Code are attributed to features of Good Practice and Recommendations for entry to the Knowledgebases. An Affirmations Knowledgebase, comprising the affirmation of actions taken (or planned) by providers, as published in review reports, will be added in 2013-14. To date, 1,469 features of good practice and 1,656 recommendations have been uploaded to the Knowledgebases, across all review methods.

QAA has published 14 Good Practice Case Studies<sup>15</sup> that have been supplied by higher education providers. The case studies give full details of the initiatives regarded as good practice, why these were developed, and how they were evaluated. It is hoped that these will stimulate discussion among practitioners and students in higher education, and promote enhancement of the learning experience.

Public engagement with the Knowledgebases is an important aspect of impact and one way of demonstrating this is by the number of site hits. From its launch in December 2012 to July 2013 the Good Practice Knowledgebase had approximately 5,000 page views. From its launch in January 2013 to July 2013 the Recommendations Knowledgebase had

14 www.qaa.ac.uk/ImprovingHigherEducation/Recommendations/pages/default.aspx

<sup>&</sup>lt;sup>12</sup> www.qaa.ac.uk/AssuringStandardsAndQuality/quality-code/Pages/default.aspx

www.qaa.ac.uk/improvinghighereducation/goodpractice/pages/default.aspx

www.gaa.ac.uk/ImprovingHigherEducation/GoodPractice/Pages/Good-Practice-Case-Studies-.aspx

approximately 1,000 page views. In its first month of operation (July 2013) the Good Practice Case Studies site had 180 page views.

The QAA Subscriber Services Survey Report of June 2013 showed the Knowledgebases to be in fourth place in QAA services value ranking.

#### Institutional Review England and Northern Ireland (IRENI)

The distribution of impact areas for IRENI in 2012-13 is shown in Tables 2.1 and 2.2.

Table 2.1: IRENI Impact areas for good practice (2012-13)

	Number	Percentage
B3: Learning and teaching	21	28.8%
B4: Enabling student development and achievement	19	26.0%
B5: Student engagement	13	17.8%
B8: Programme monitoring and review	7	9.6%
Part C: Information about higher education provision	7	9.6%
B11: Research degrees	2	2.7%
B2: Admissions	2	2.7%
B6: Assessment of students and accreditation of prior learning	2	2.7%
Total	73	100.0%

Table 2.1 shows quality of learning opportunities is reflected in the top three areas of good practice, which account for 75 per cent of the total:

- Chapter B3: Learning and teaching
- Chapter B4: Enabling student development and engagement
- Chapter B5: Student engagement.

Table 2.1 shows no features of good practice have been noted for:

- Chapter B1: Programme design and approval
- Chapter B7: External examining
- Chapter B9: Complaints and appeals
- Chapter B10: Management of collaborative arrangements.

As there were just 20 IRENI reviews of HEFCE-funded providers during 2012-13, there is not a sufficiently large sample to be able to make substantial comment on Tables 2.1 and 2.2. The indication from this initial analysis is that the examples of good practice largely emanate from the delivery, and support for, the learning experience offered to students and these results provide a basis for a watching brief.

Table 2.2: IRENI Impact areas for recommendations (2012-13)

	Number	Percentage
B10: Managing higher education provision with others	21	19.3%
B8: Programme monitoring and review	19	17.4%
B3: Learning and teaching	14	12.8%
Part C: Information about higher education provision	14	12.8%
B7: External examining	11	10.1%
B5: Student engagement	5	4.6%
B4: Enabling student development and achievement	5	4.6%
B6: Assessment of students and accreditation of prior learning	4	3.7%
A5: Externality	4	3.7%
B1: Programme design and approval	4	3.7%
B9: Academic appeals and student complaints	2	1.8%
B11: Research degrees	2	1.8%
A6: Assessment of achievement of learning outcomes	1	0.9%
A4: Approval and review	1	0.9%
A1: The national level	1	0.9%
B2: Admissions	1	0.9%
Total	109	100.0%

There are recommendations across all Chapters of Part B: 'Assuring and enhancing academic quality' of the Quality Code, but Table 2.2 shows that there were relatively few recommendations made within the context of Part A: 'Setting and maintaining academic standards' of the Quality Code. This is commensurate with the number of positive judgements (outcomes) on standards. *Chapter B10: Managing higher education provision with others* had the highest amount of recommendations and this reflects continuing growth in the number and nature of working relationships between UK higher education providers and their partners.

#### **Review of College Higher Education (RCHE)**

Table 2.3 shows the impact areas for RCHE good practice and recommendations in 2012-13. In view of the limited data available, it would be unwise to extrapolate from these results; however, it may be worth considering that eight of the features of good practice relate to *Chapter B4: Student support, learning resources and careers education, information, advice and guidance* of the Quality Code, which may suggest recognition of resource importance in these areas by colleges providing higher education.

There are eight recommendations against *Chapter B8: Programme monitoring and review* of the Quality Code and that may indicate some development needs, probably in partnership with awarding bodies. It is not surprising that there are no items against Part A of the Quality Code, as ultimate responsibility for setting standards lies with awarding bodies.

Table 2.3: RCHE good practice and recommendations impact areas (2012-13)

	Good practice	Recommendations
Part A: Setting and maintaining	•	
threshold academic standards		
Chapter A1: The national level	0	0
Chapter A2: The subject and	0	0
qualification level		
Chapter A3: The programme level	0	0
Chapter A4: Approval and review	0	0
Chapter A5: Externality	0	0
Chapter A6: Assessment of	0	0
achievement of learning outcomes		
_	Good practice	Recommendations
Part B: Assuring and enhancing	·	
academic quality		
Chapter B1: Programme design and	0	1
approval		
Chapter B2: Admissions	0	1
Chapter B3: Learning and teaching	9	8
Chapter B4: Student support, learning	12	4
resources and careers education,		
information, advice and guidance		
Chapter B5: Student engagement	2	6
Chapter B6: Assessment of students	2	7
and accreditation of prior learning		
Chapter B7: External examining	1	6
Chapter B8: Programme monitoring and	7	18
review		
Chapter B9: Complaints and appeals	1	2
Chapter B10: Management of	1	0
collaborative arrangements		
Chapter B11: Research degrees	0	0
	Good practice	Recommendations
Part C: Information about higher	2	8
education provision		
Totals	37	61

#### **Initial Review**

Table 2.4 shows the impact areas for IR in 2012-13. The prevalence of recommendations should be viewed in the light of the limited experience of higher education delivery by these providers, and it is expected that the instances of good practice will increase with greater maturity.

Table 2.4: Initial Review good practice and recommendations impact areas (2012-13)

	Good practice	Recommendations
Part A: Setting and maintaining threshold	0	0
academic standards		
Chapter A1: The national level	0	0
Chapter A2: The subject and qualification level	0	0
Chapter A3: The programme level	0	0
Chapter A4: Approval and review	0	0
Chapter A5: Externality	0	0
Chapter A6: Assessment of achievement of	0	0
learning outcomes		
	Good practice	Recommendations
Part B: Assuring and enhancing academic	0	0
quality		
Chapter B1: Programme design and approval	0	0
Chapter B2: Admissions	0	0
Chapter B3: Learning and teaching	6	9
Chapter B4: Student support, learning	2	6
resources and careers education, information,		
advice and guidance		
Chapter B5: Student engagement	0	6
Chapter B6: Assessment of students and	1	1
accreditation of prior learning		
Chapter B7: External examining	1	0
Chapter B8: Programme monitoring and	6	6
review		
Chapter B9: Complaints and appeals	0	1
Chapter B10: Management of collaborative	0	0
arrangements		
Chapter B11: Research degrees	0	0
	Good practice	Recommendations
Part C: Information about higher education	2	6
provision		
Totals	18	35

#### Action plan monitoring

A major aspect of changes in review methods has been the requirement for all providers to produce action plans following review, regardless of judgements. Review reports provide critical assessments and recommendations for improving quality and standards, and provider action plans are based on these. To date nearly 175 items (75 per cent of the total) have been noted as completed against IRENI action plans for reports published in 2012-13. Given that providers have up to 10 weeks after report publication to produce action plans, obtaining 75 per cent completion within the operating year is a major achievement. This represents a new approach, first because of the requirement for all providers to produce action plans and secondly because the Quality Code has only recently been completed. With those two components the impact areas can be identified.

Key areas of impact are in learning and teaching (*Chapter B3: Learning and teaching*), programme monitoring and review (*Chapter B8: Programme monitoring and review*) and management of collaborative arrangements (*Chapter B10: Managing higher education provision with others*). Table 2.5 shows example impact areas from IRENI action plan completed items.

Table 2.5: Example impact areas from IRENI action plan completed items

Quality Code	Change
Part A: Setting and maintaining threshold academic standards	<ul> <li>Revised regulations</li> <li>Revised approval process</li> <li>Updated academic partnerships quality assurance manual</li> </ul>
Part B: Assuring and enhancing academic quality	
Chapter B1: Programme design and approval	<ul><li>Revised programme approval procedures</li><li>Revised compliance procedures</li></ul>
Chapter B3: Learning and teaching	<ul> <li>Approved new sections for the quality assurance handbook</li> <li>Approved new policies and procedures</li> <li>Revised regulations</li> <li>Produced semester progress tracking reports</li> <li>Created e-learning training for staff and students</li> <li>Academic development handbook created</li> <li>New staff appointed to provide student support</li> <li>Quality Code section included in induction for new staff</li> <li>Development on Quality Code provided for existing staff</li> <li>Enhancement activities developed further</li> <li>Supervision monitoring standardised</li> <li>New learning and teaching strategy approved</li> </ul>
Chapter B4: Student support, learning resources and careers education, information, advice and guidance	<ul> <li>Oversight of guidance by Academic Registrar's Group agreed</li> <li>Guidance framework on content of student handbooks agreed</li> <li>Statement on student access to resources agreed</li> <li>Working group established to develop policy to ensure consistent support</li> </ul>
Chapter B5: Student engagement	<ul> <li>New schedule for student charter agreed</li> <li>Staff-Student Liaison Committee revised</li> <li>Group established to ensure effective student representation</li> <li>Programme Committees with student reps established</li> <li>CoP on Staff Student Liaison Ctte revised</li> </ul>
Chapter B6: Assessment of students and accreditation of prior learning	<ul> <li>Tracking grid introduced to monitor returns of assessed work</li> <li>Operational plan produced to ensure consistency of assessment</li> <li>Assessment policy revised</li> <li>Maximum turnaround policy approved</li> </ul>

## Chapter B7: External Procedures revised to ensure independent and examining objective advice Logs of departmental responses to external examiners initiated Strategy group established to oversee roles Representation on awarding bodies' committees Online system developed for appointments and report management Revised format of reports and approach to sharing with students Criteria and appointment now determined by relevant committee Nominations scrutinised by Deputy Provosts Chapter B8: Programme New survey package purchased monitoring and review Moodle upgraded New programme specifications developed Board of Studies, committees and management roles revised Implemented new systems and processes Data to support enhancement identified Formalised planning and communication Further developed processes for enhancement Identified links between outputs and how to enhance student learning Staff development regulations revised Handbook transferred to new platform to improve presentation Revised policies and processes Annual summary reports monitored and actioned Benchmark statements included in Quality Manual Updated schedule of monitoring reports Reporting developed to provide comparative performance information New subcommittee of Quality, Enhancement and Standards Committee to be established Extended the CoP to include Distance Learning Reviewed and restructured management Vice Principal for Undergraduate Studies and Quality appointed Centralised document management system created System for oversight of policies and procedures developed New post of Quality Assurance Manager created Revised regulations and quality related policies and CoP Revised approaches and guidance to student evaluation of placements Guidelines on management of student placements and provision of information to

	students developed.
Chapter B9: Complaints and appeals	Explored ways to host the University regulations and guidance on appeals on the website and how to better communicate appeals information to students
Chapter B10: Management of collaborative arrangements	<ul> <li>New policies and procedures approved for Quality Handbook</li> <li>New partnership reapproval procedure developed and included in Quality Handbook</li> </ul>
	<ul> <li>MoAs redrafted</li> <li>Recommendations from Academic Standards         Committee in regard to monitoring added to         Quality Handbook</li> <li>Partner Regulations to be submitted to</li> </ul>
	<ul> <li>Academic Standards Committee annually</li> <li>New staff appointed with regulatory experience</li> <li>New and existing staff reminded of partner regulations</li> </ul>
	<ul> <li>New systems of guidance introduced</li> <li>Revised Register of Collaborative provision</li> <li>Mechanisms strengthened and monitored</li> <li>Policy revised</li> </ul>
	<ul> <li>Guidelines updated and amendments to University regulations and MoAs</li> <li>External subject specialists and Approval panels introduced</li> <li>Amended academic agreements</li> </ul>
	<ul> <li>Assessment to be managed by the University</li> <li>Criteria and processes revised</li> <li>New standing committee created</li> </ul>
	<ul> <li>Each faculty to have a person with responsibility for collaboration</li> <li>MoAs to revised</li> <li>New policy developed for partnerships</li> </ul>
Chantar Dadi Dagarah	Register checked and updated  Register checked and updated
Chapter B11: Research degrees	<ul> <li>Policy discussed and enhanced</li> <li>Interim code of practice introduced for 2013-14</li> <li>Enhanced processes for monitoring TAP meetings</li> </ul>
	<ul> <li>Research working group established</li> <li>Supervision procedures revised</li> <li>Second supervisors to be appointed by Oct</li> </ul>
	<ul> <li>Maximum enrolment periods and process of applying for interruptions and extensions revised</li> </ul>
Part C: Information about higher education provision	<ul> <li>Policy revised</li> <li>Information is regularly reviewed and partners reminded of the process</li> <li>Revised and updated policy</li> <li>Process of review developed</li> <li>Student partnership to be regularly reviewed by</li> </ul>
	students' union and University

## Summary of impact of review activities

- QAA's review and related work has an impact on the higher education sector in various ways, including:
  - promotion of enhancement by identification of good practice during the review process
  - development by use of appropriate recommendations that have arisen from review
  - the creation and implementation of action plans by providers
  - public engagement relating to the foregoing.
- The publication of the Quality Code now enables QAA to consider impact against each of its Chapters. These impact areas afford a new structured approach to reporting and analysing the impact of QAA's activities.
- 1,469 features of good practice and 1,656 recommendations have been uploaded to the Good Practice and Recommendations Knowledgebases.
- Over a period of seven months the Good Practice Knowledgebase had approximately 5,000 hits.
- Over a period of six months the Recommendations Knowledgebase had approximately 1,000 hits.
- The Good Practice Case Studies site had 500 hits in its first month of operation.
- The quality of learning opportunities is reflected in the top three areas of good practice for IRENI.
- 75 per cent of items have been noted as completed against IRENI action plans.
- Example actions have been provided in this chapter to represent QAA's impact as a result of review activity.
- These actions have been linked to Chapters of the Quality Code, especially:
  - Chapter B3:Learning and teaching
  - Chapter B8: Programme monitoring and review
  - Chapter B10: Management of collaborative arrangements.

# 2.4 Developments in Higher Education Review

#### Moving towards a common review method

Higher Education Review represents a significant milestone in QAA's review activities.

First, it is a common review method for all subscribers to QAA (which include all HEFCE-funded institutions and directly funded further education colleges), as well as non-QAA subscribers with access to HEFCE funding.

Additionally, within the academic year 2013-14, Higher Education Review will also be applied to new applicants for educational oversight (private colleges wishing to apply for permission to recruit students from outside the European Union) and, over the next few years, it is intended that all whole-institution reviews will adopt the Higher Education Review method.<sup>16</sup>

The achievement of a common review method through Higher Education Review is an important step in realising a level playing field for the quality assurance of providers of any type, reinforcing the principle that all providers should fulfil the expectations of the Quality Code and be judged on a common basis.

<sup>&</sup>lt;sup>16</sup> The method of review for new applicants for educational oversight in 2013-14 is HER+. The plus refers to a review of the provider's governance and financial sustainability. For publicly funded providers in England, responsibility for reviewing these areas resides with HEFCE.

#### Variation in review intervals and resources

The second important development in Higher Education Review is the variation in both the interval between reviews and also in the resource dedicated to individual reviews.

Whereas previous methods had a fixed interval for review, standard team size and visit duration, the new Higher Education Review is far more flexible. In part, this is to deal with the diversity of providers under review, ranging from further education colleges with a handful of students to large providers with tens of thousands. More importantly, this flexibility reflects the risk-based nature of the process, with the greatest scrutiny and resource being applied where it is most needed.

The logistical implications of a flexible method are relatively straightforward for QAA to manage (notwithstanding the issue of budgeting for a process where the unit cost of individual reviews cannot be known far in advance). What is perhaps more difficult to manage are reviewers' decisions about the duration of review visits. In broad terms, the method calls for providers with strong track records in quality assurance to have shorter review visits than those with weaker track records. Yet, in both cases, reviewers are required by the end of the process to make robust summative judgements about the providers' management of academic standards and quality. This is a heavy responsibility and may lead reviewers to press for longer review visits, in order to ensure they have sufficient time to reach secure conclusions.

# 2.5 Assessment of risks and challenges and the capacity of QAA to manage these

## Risk management

QAA has a detailed approach to risk management, including addressing risk associated with delivery of the HEFCE contract, which involves both operational and corporate risk registers which are reviewed termly as part of QAA's planning and monitoring processes. Shifts in risk are reported to the Planning and Operational Performance Group who identify any impact on the corporate risk register. The corporate risk register is reviewed regularly by the QAA Audit Committee and Board, with management responsibility for its maintenance sitting with the Head of Governance.

HEFCE has received a copy of both the Audit Committee and Internal Auditors annual reports for 2012-13. The internal auditors annual report on risk management, received at the February 2013 meeting, commented positively on developments since the previous risk management review with a 'green' audit report containing two minor recommendations. In the light of this review, no further changes were made to the format of the risk register, policy or guidelines.

The most significant risk related to the HEFCE contract which could have been realised in 2012-13 are:

- a successful appeal against QAA judgements and the potential for challenge via Judicial Review. QAA has reported in more detail to HEFCE on lessons learned from this and our solicitors have delivered training and briefing for colleagues involved in managing reviews
- a substantial growth in appeals in 2012-13, almost exclusively from the private sector. We are reviewing our capacity to deal with these in our new revised governance structure.

## Looking ahead:

- We are now approaching 700 institutions in a 'reviewing relationship' with QAA in one way or another. This includes over 200 further education colleges being required to subscribe and having expectations of services they have not previously been entitled to, and which their subscriptions are not sufficient to cover. Our structures, systems and means of delivering services are being adapted to cope with this substantial growth in subscriber numbers.
- The external review by ENQA was also a positive endorsement of how QAA manages the activities under contract to HEFCE. However it did contain the following recommendation under ESG 3.5 (independence): 'care should be taken to safeguard the element of current HEFCE funding and to protect the operational independence of QAA in any changes following the implementation of revisions of HEI funding model in England, whereby funding for teaching will in future reach institutions wholly via student fees (rather than a combination of tuition fees and grant via HEFCE).' In affirming the panel's report on QAA, the ENQA Board requested that 'the follow-up report should include an analysis on this'. QAA will need to report on this in September 2015.
- Projections for QAA's work over the next five years shows an average of some 350 reviews per year (across all countries and methods). Regardless of duration or scale, each review needs management, organisation and scheduling and QAA has begun the process of adapting its structures, staffing and systems to ensure sufficient resilience to deliver.

## **Business continuity**

The QAA Business continuity policy and plan is approved by the Audit Committee with management oversight via the Information Governance Group and day-to-day management of arrangements by the Director of Resources. This is backed up by detailed group recovery plans. High level critical incidents are reported to the Directorate and Audit Committee. Exercises are conducted to test the robustness of arrangements.

The most significant changes in continuity arrangements in 2012-13 involved:

- the creation of additional capacity for failover IT systems to a data centre through a contract with Janet, delivered by Eduserv. The need arose due to total power failure problems in Southgate House identifying weaknesses in previous arrangements.
- a 10-year extension, with a five-year break, of the lease on Southgate House (expired June 2013) and a refurbishment to ensure the office was fit for purpose, funded through rent and service charge reductions and release of balance sheet dilapidations provisions.

## Looking ahead:

- Business Continuity arrangements were reviewed during the 2012-13 year and a revised plan approved at the October 2013 Audit Committee meeting
- the arrangements were subject to a review by Internal Audit which will be reported to the Audit Committee in February 2014.

#### Specific risks and challenges related to Higher Education Review

Whilst the achievement of a common review method in Higher Education Review is an important step in realising a level playing field for the quality assurance of providers of any

type, the new method will not be without its challenges for some and, in particular, those providers whose academic governance and management systems are less well established than those in the publicly funded sector, or those unfamiliar with QAA's approach.

Clearly, this presents a challenge to QAA in helping these providers to prepare for Higher Education Review thoroughly and effectively. QAA will approach this challenge through sector briefings and bespoke preparatory meetings.

Section 2.4 (above) also refers to the logistical implications of a flexible method and that the responsibility of making robust summative judgement may lead reviewers to press for longer review visits, to ensure they have sufficient time to reach secure conclusions. QAA will try to mitigate this possible tendency, by encouraging providers to provide clearer evidence early on in the review process about the strength of their quality assurance procedures. In turn, this should give reviewers greater confidence when making decisions about the duration of visits.

## 2.6 Commentary on QAA processes

As stated in paragraph 1.2, the QAA Board approved a revised process for the consideration of appeals against QAA review judgements, as a result of the upheld appeal in respect of a HEFCE-commissioned review.

In this particular case, the panel concluded that the review report did not articulate in sufficient detail why the review team concluded that the issues identified amounted to a failure to meet the expectations of the Quality Code. Nor did they articulate why the matters identified created a level of risk, such that it was necessary to conclude that threshold academic standards were not being met. On the basis of the report, the appeal panel was unable to determine how the review team had reached its conclusion that the academic standards at the provider did not meet UK expectations for threshold standards.

The appeal highlighted the difficulty in making judgements about threshold academic standards, based on evidence about systems and processes. This issue has been addressed in the design of the new Higher Education Review method and, in particular, in changing the wording of the threshold standards judgement from 'meets UK expectations for threshold standards' to 'meets UK expectations for the setting and maintenance of ... threshold standards.'

The appeal also highlighted the need for review teams to give clear and explicit reasons for their judgements. Training has also been given by QAA's lawyers to QAA officers writing review reports, on the requirements in law about specifying reasons for decisions. The need has been emphasised to articulate clearly the reasons why expectations have not been met; whether these, individually or collectively, represent a serious risk; what controls are in place to mitigate these risks; and what understanding the provider has of where things are falling short and how to put them right. This training will also be disseminated to reviewers.

A full Lessons Learned from Appeals report was sent to HEFCE in August 2013. The appeals process will be subject to further development in 2013-14.

## Part 3: Wider role of QAA

## 3.1 QAA research activity

2012-13 was the first year in which QAA's research strategy was implemented. The goals of the strategy are to:

- support the core business of QAA through the provision of intelligence, research and analysis
- maximise the impact and value of the information and intelligence QAA holds, for subscribers and stakeholders
- support business development and the diversification of income streams
- develop a research culture, capability and capacity within QAA.

Below is a summary of the main achievements and outputs of the research strategy in 2012-13.

## 3.1.1 Commissioned research projects

a) Student expectations and perceptions of higher education (King's College, University of London)

The aims of this project were to explore the views of students entering higher education in the four nations of the UK in 2012-13, specifically their perceptions and expectations of the quality of their learning experience, and the academic standards of their chosen programmes of study. This was undertaken in the context of the first year of a significantly different funding model in England to that of previous years, and to that operated by the other nations of the UK. The final report was published in November 2013.

b) Student engagement in learning and teaching quality management (University of Bath)

This project used multi-method qualitative research methods to explore the following questions, in relation to the Expectation of *Chapter B5: Student engagement* of the Quality Code.

- To what extent is the over-arching expectation for student engagement as specified in *Chapter B5* reflective of the current status of student engagement activities of higher education providers, in the four UK nations?
- To what extent are the indicators of sound practice as specified in *Chapter B5* reflective of the current student engagement activities of higher education providers in the four UK nations?

The final report was published in October 2013

c) What students think of their higher education: an analysis of student written submissions (SWS) for IRENI in 2011-12

This research report presents an analysis of the student written submissions for IRENI reviews in 2011-12, providing a current and authentic account of students' views. This report was published in November 2013.

## d) Capturing an HE ethos in College Higher Education practice

This research report explores the context in which further education colleges in England have responded to the opportunities and challenges of providing higher education programmes. Specifically, it explores the connection between two features which have been identified as vital in ensuring that such programmes can provide an enriching learning experience for students.

- i) That experience needs to be demonstrably higher, not just in terms of enabling students to achieve high level learning outcomes, but also in enabling students to experience what has been referred to as an 'HE ethos'
- ii) That this experience needs to be soundly underpinned by a culture of 'research and scholarship'.

The report will be published in December 2013.

## 3.1.2 Research projects undertaken by QAA

In December 2012, QAA was commissioned by the Department for Business, Innovation & Skills to revise the Listed Bodies Order. The project was successfully completed, on time and within budget, with the revised Listed Bodies Order to be published on the Department's website in autumn 2013.

#### 3.1.3 Publications

During 2012-13, QAA produced a range of publications to contribute to sector knowledge and to stimulate debate. Publications commissioned during 2012-13 include the following:

#### Outcomes (series 3)

- Student Engagement (published October 2012)
- Assessment and Feedback (published Nov 2012)
- Postgraduate Research Students (published Nov 2012)

#### Talking about Quality

- Challenges in a Changing Sector (Sir Tim Wilson, published September 2013)
- Degree-Awarding Powers (Professor Chris Clare, Martin Lockett and Chris Maguire, published May 2013)
- College Higher Education: the unasked questions (Professor Gareth Parry, published Nov 2013)

## Guidance documents

In August 2013, QAA published a suite of four guidance documents for higher education providers, to assist them in providing information for students. Complementary guides aimed at students were also produced.

#### Guidance documents:

- Explaining staff teaching qualification
- Explaining class size
- Explaining student workload
- Responding to student feedback

Complementary student guides:

- Information on staff teaching qualifications
- Information on class size
- Information on workload
- Information on how you can comment on your course

These documents were produced in response to a Higher Education Public Information Steering Group (HEPISG) initiative, and as a result of inter-agency collaboration across the higher education sector, with bodies such as the NUS, HEFCE, the Higher Education Statistics Agency, the Higher Education Academy, Staff and Educational Development Association, Universities UK, GuildHE.

## 3.1.4 Other activities

- King's College, University of London and QAA, as a collaborative partner, successfully secured an Economic and Social Research Council-funded PhD studentship. The PhD student was appointed with effect from September 2013 and the focus for the research will be risk-based quality assurance and the potential for institutional failure.
- In October 2012, QAA relaunched the Higher Education Empirical Research (HEER) database.

## 3.2 Working with the Higher Education Academy

QAA and the Higher Education Academy (HEA) work together on an ongoing basis, at a number of levels and across a range of projects related to the development and enhancement of higher education.

At a strategic level in 2012-13, QAA's and HEA's Executive teams met to discuss strategic areas for collaboration and joint working. The meetings were timed to coincide with, and inform, the planning cycle for each organisation.

QAA and HEA have reciprocal observer status on the Board of Directors of each organisation. Regular attendance and contribution to the discussion, including Board awaydays, has been welcome and proved helpful to both organisations.

At an operational level, the coordinating mechanism for joint and collaborative activity is the Joint Operations Group (JOG), which meets twice per year.

The main purpose of JOG is to review levels of collaborative activity, identify opportunities for more effective partnership working, and maintain oversight of joint projects and partnership working between the two organisations in order to avoid duplication and to maximise the impact of activities undertaken, for the benefit of the sector and stakeholders.

JOG oversees projects and collaborative working in England, Northern Ireland and, where relevant, internationally. JOG also takes note of, and is informed by, developments in Scotland and Wales, where established networks for collaborative working already exist. For example, QAA and HEA have worked jointly to meet the Future Directions Wales enhancement agenda in Wales, with QAA input through its membership of the steering group and various working groups.

QAA and HEA also collaborated on the following projects in the operational year 2012-13.

## **Higher Education Achievement Report**

QAA is represented on both the Advisory and Operations Groups for the HEA-led project to roll out the adoption of the Higher Education Achievement Report (HEAR). QAA will lead on updating the national description of the higher education systems in England, Wales, Northern Ireland and Scotland, integral to the HEAR, as redevelopment of Part A of the Quality Code is embedded across the sector in 2013-4.

## **Recognising Achievement Beyond the Curriculum**

QAA and HEA have collaborated on a joint project to develop a tool kit for higher education providers to assist them in deciding which activities that students undertake outside their academic programme may be recognised through an additional award. The guidance, to be published in December 2013, is designed to complement the advice issued to higher education providers implementing the HEAR, and the factors to be considered if the higher education provider's intention is to include the award in section 6.1 of the HEAR.

## **Grade Point Average**

QAA is represented on the HEA-led Grade Point Average (GPA) Advisory Group overseeing a national discussion and pilot projects on the concept of introducing a GPA system into higher education.

## **Employer engagement**

QAA staff presented, with employer representatives, the outcomes of its work to deliver the Employer-based Training and Accreditation service at the HEA annual conference in July 2013. The presentation 'Workforce development through employer-based training' contributed to demonstrating effective practice in an area of mutual interest to both QAA and HEA.

#### **Public information about HE**

HEA was represented on the working groups coordinated by QAA (see also sections 1.5.5 and 3.1.3) to develop student and institutional guidance documents on:

- explaining staff teaching qualification
- explaining class size
- explaining student workload
- responding to student feedback.

## **Entrepreneurship and enterprise**

An ongoing project focused on the production and dissemination of guidelines to inform curriculum development and delivery, to promote graduate skills in entrepreneurship and enterprise. Permission has been granted to Pearson to use various extracts from QAA guidance on enterprise and entrepreneurship education, for use in its delivery guide for the BTEC level 5 higher apprenticeship in innovation and growth.

## External examiners' understanding and use of academic standards

A jointly commissioned HEA-QAA research project was undertaken by Oxford Brookes University and the University of Cumbria. The research was commissioned to illustrate to the sector how external examiners understand academic standards and how they use that understanding to give advice and recommendations to the provider.

The research emphasises the importance of a shared understanding (between internal and external examiners) of the standards applicable to programmes and the qualifications to which they lead. It shows the value of communication between examiners to promote this understanding within a specific subject, and to ensure awareness of how achievement is reported within the subject and across the institution as a whole. In addition, it highlights the importance of the guidance in the Quality Code and the HEA's *A Handbook for External Examining*.

## **Education for Sustainable Development**

QAA and HEA are co-facilitating the development of guidelines on Education for Sustainable Development for higher education providers, through a consultative group. The guidelines are planned for publication in spring 2014.

## 3.3 Transnational education activity and consultation

In 2012-13, QAA completed a review of UK transnational education (TNE) in China. TNE is defined as the provision of education for students based in a country other than the one in which the awarding institution is located.

The review was carried out using a four stage process:

- i) Information gathering about UK universities' TNE activity in China.
- ii) Desk-based analysis of documentation provided by universities.
- iii) A review visit to China (December 2012).
- iv) Various reports (published May 2013).

Output from the review comprised a country overview report, 10 individual review reports, four case studies and a follow-up report on the provision covered in QAA's 2006 Review of UK TNE in China.

During 2013-14, QAA is planning to undertake reviews of UK TNE in the United Arab Emirates (UAE), centred on the emirates of Dubai and Ras Al Khaimah, and in the Caribbean, centred on Trinidad and Tobago.

# 3.4 Quality assurance of flexible and online learning

All of the reviews conducted under this HEFCE contract scrutinised providers' arrangements for managing flexible, distributed and online learning. Reviewers were asked to determine whether providers met the Expectation, 'The quality of learning opportunities delivered through flexible and distributed arrangements, including e-learning, is managed effectively.'

As might be expected, the providers under review offered flexible and online learning to varying extents. All operated e-learning platforms as a supplement to learning undertaken in the classroom, but only some delivered parts of courses or whole courses entirely at a distance from campus. Many of the courses offered at a distance were postgraduate. Only one provider under review had explicitly begun to investigate the possibility of becoming

involved in massive open online courses (MOOCs). All of the reviews found that the Quality Code Expectation on flexible and distributed learning was met, with the exception of one further education colleges reviewed under RCHE.

In IRENI, there were three recommendations in this area shared among three providers. In RCHE, there were three recommendations confined to one provider (the provider which did not meet the Expectation overall). The recommendations in IRENI tended to focus on the formalisation of arrangements for managing this type of provision in advance of planned growth. In RCHE, the provider concerned was encouraged to ensure all students could access the e-learning platform and to adopt an action plan to underpin its e-learning strategy.

In both IRENI and RCHE, there were two affirmations associated with flexible and online learning for two different providers. IRENI also generated one example of good practice in this area - the equity of student learning opportunities between face-to-face and distance-learning programmes - while RCHE garnered two examples, both linked to the effectiveness of the providers' e-learning support for classroom-based delivery.

#### **MOOCs**

QAA held a successful conference on the quality assurance of MOOCs in July 2013 which assessed developments to date, and considered how these new and innovative forms of learning related to the Quality Code. QAA has also been in consultation with FutureLearn - owned by the Open University - about the design and development of its MOOCs platform, and its proposals for the recognition of student achievement.

QAA's Policy Development Group has established a working group to identify QAA's approach to the quality assurance of MOOCs. The group will also consider the student experience and student involvement in the quality assurance of MOOCs.

# 3.5 Access to Higher Education

QAA completed reviews of three Access Validating Agencies (AVAs) in 2012-13, in London, the North East and Cambridgeshire. The Access Recognition and Licensing Committee confirmed two 'low risk' and one 'medium risk' judgement, and all three AVA licences were renewed by the Board.

The new Access to HE website includes more information about AVAs,<sup>17</sup> including a graphical display of review outcomes which is adjusted when the AVA completes required actions.

A major development in 2012-13 was the re-design of the Access to HE Diploma. Following detailed research, round table discussions (128 participants) and formal consultation (220 responses), and with the support of an expert working group, a revised specification was developed which will ensure that all students achieving the Access to HE Diploma do so on the basis of having studied for a common volume of credit. This includes new requirements about the amount which will be graded and the amount which will come from academic subject content, whilst leaving space for students' achievement in generic study skills or other subjects to be recognised.

This development will provide greater consistency in the demands of different Access to HE courses and more transparency for higher education providers about the achievements of

17 www.accesstohe.ac.uk/HowCourses/AVA-profiles/Reports/Pages/OCN-London-Region.aspx

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different students. AVAs and providers are undertaking their own development work in 2013-14, for full implementation from September 2014.

During 2012-13, an extensive range of data was produced about Access to HE students and their progression to higher education, including the summary data provided in the Access to HE *Key Statistics*. At a time of much concern in the sector about the declining number of applications from mature students, it is pleasing to report an increase again in the number of Access to HE students applying for entry in 2012-13, to 32,230.

# 3.6 IRENI report on the theme for 2012-13: the first year student experience and student involvement

QAA is currently producing a separate report on the thematic element of IRENI, for the duration of the method (2011-12 and 2012-13).

www.accesstohe.ac.uk/AboutUs/Publications/Pages/key-stats-13.aspx

## Part 4: Critical self-evaluation of QAA's performance

QAA is accountable to a wide range of internal and external stakeholders. It fulfils this accountability through a comprehensive range of internal quality assurance mechanisms. In developing these mechanisms, QAA has been an active participant in - and influenced by - the ENQA Internal Quality Assurance Working Group and in 2013 was subject to a review by ENQA, resulting in a positive result of compliance with all the European standards.

QAA is committed to high standards of service and performance and has developed a Framework for Performance Management which maximises the effectiveness of planning, delivery, monitoring and evaluation. The framework provides an overarching quality assurance mechanism and helps to embed a strong culture of performance management for QAA.

QAA accountability has also been reinforced through the introduction of group service delivery statements and risk registers, which are monitored on a quarterly basis, and QAA submits an Annual Effectiveness Report to its Board.

QAA has an annual programme of internal audit in which an external organisation is commissioned to scrutinise key areas of QAA's work. These annual audits result in a report which includes an action plan to address any areas of concern. QAA's Audit Committee agrees the annual internal audit programme, receives audit reports, and checks that action plans are implemented.

As part of the critical self-reflection of its performance, QAA actively encourages internal and external feedback, in order to inform the development and improvement of its work.

Internal reflection mechanisms include an annual staff conference, staff survey, scheduled Board, Directorate, group and team planning days, and cross-QAA groups. QAA also holds monthly staff briefings, where members of staff have the opportunity to raise questions (anonymously if they prefer).

There are a number of opportunities to reflect on, and respond to, internal and external recommendations for improvement, and to consider how to respond to, or influence, the changing context in which QAA works.

This internal performance management framework enables the linking of strategic aims, establishing of priorities, planning and budgeting, resource allocation, risk management, organisational performance monitoring, objective setting and performance review within a comprehensive and coherent framework. The framework comprises 4 strands:

- 1. objectives and targets
- 2. planning and budgeting
- 3. monitoring and evaluation
- 4. performance review.

One of the two organisational priorities QAA set for itself during 2012-13 was to continue the organisational improvement agenda through developing and encouraging management responsibility, accountability and authority. QAA undertook a reorganisation of the senior committee structure, creating a Policy Development Group and a Planning and Operational Performance (POP) Group. The first focuses on policy developments in higher education, which may have an impact on the future strategic direction of QAA, while the second concentrates on monitoring and analysing QAA performance against the established strategic priorities, annual plan and service delivery statements.

The purpose of the POP Group is to drive forward organisational performance and it is a decision-making committee with the aim of finding solutions to improve organisational performance in the current performance year, and to plan for the forthcoming year. Throughout 2012-13 the achievement of the annual plan has been monitored quarterly by the POP group, where significant achievements and exceptions are reported and discussed, and any necessary corrective action identified. The indicators of success (attached to each priority in QAA's annual plan) are also reviewed and updated quarterly, using a traffic light assessment of progress to date.

In preparation for review for full membership of ENQA in May 2013, QAA compiled a self-evaluation report which was published and circulated widely in the higher education sector for comment. Pertinent to QAA's approach to critical self reflection and the continuous improvement of performance is the following extract in relation to Standard 3.8 Accountability procedures.

## Feedback and reflection mechanisms

'QAA actively encourages internal and external feedback, in order to inform development and improvement of its work.

A confidential annual staff survey, managed by an external body, provides a route for staff to raise any concerns and is a key internal feedback mechanism. The results of the 2012 annual survey have resulted in action plans to address issues raised, which are reviewed regularly and build on good practice identified.

Internal reflection mechanisms also include an annual staff conference; scheduled Board, Directorate, group and team 'away days'; and short, informal meetings and cross-Agency groups. QAA also holds monthly staff briefings, where members of staff have the opportunity to raise questions (anonymously if they prefer).

There are a number of opportunities to reflect on, and respond to, internal and external recommendations for improvement, and to consider how to respond to, or influence, the changing context in which QAA works.

QAA values external feedback on all aspects of its work, both retrospectively and when planning for future developments. QAA has a number of established external feedback mechanisms.

- QAA has a Student Advisory Board, a Research Strategy Advisory Board and other groups of external experts, to whom it turn for views.
- All participants in QAA events, including training, consultation events, briefings or conferences, are encouraged to provide feedback. QAA routinely analyses such feedback to capture lessons learned.
- Consultation events, such as those for the development of the Quality Code, exemplify the range of mechanisms and opportunities - electronic and face-to-face that are used to facilitate both professional input and feedback about the consultation process itself.
- Other examples include the use of focus groups, blogs, discussion boards and social media, including LinkedIn, Twitter and Facebook.

QAA welcomes external scrutiny and review, and the opportunity to develop in line with recommendations made, and seeks to adopt relevant external standards. See pages 22-24 for QAA's actions and progress, following its 2008 review by ENQA.'

The outcomes of these feedback and reflection mechanisms will inform future strategic and operational planning. Generally, the QAA Board considers the strengths of QAA to be:

- involvement of student reviewers
- public information improved
- Quality Code underpins all methods
- enhancement strengthened
- move to common review framework for the UK

The QAA Board considers the areas for development to be:

- adapting to the needs of the devolved nature of UK higher education
- securing greater financial independence through balanced funding and income generation
- expanding the use of international reviewers on QAA review teams (taking into account the need to add value).

Examples of changes to QAA processes as a result of the critical self-reflection of performance are:

- the changes implemented to the consideration of the Appeals process, as outlined in paragraph 2.6
- the changes introduced to the evaluation process for review stakeholders, as outlined in paragraph 1.6.1.

# Looking ahead

## Areas for development (2013-14)

The review of QAA activity in 2012-13 highlights areas of development in the current operational year (2013-14). In particular:

- a. The introduction of a system of risk-based quality assurance (Higher Education Review). The implementation of a common system of risk-based review places an emphasis on both past performance of institutions and the predictive risk associated with future performance. To support and inform Higher Education Review, QAA is introducing the use of provider profiles.
- b. The new Higher Education Review method has taken into account the lessons learnt from the appeals made against IRENI judgements in 2012-13, ensuring that explicit references to the Quality Code underpin judgements. This is now embedded in reviewer training.
- c. The increase in QAA subscribers from the further education sector has stimulated engagement with the specific needs of college-based higher education, reflected in the commissioning of research in this area, the publication of a *Talking about Quality* paper, and the focus of QAA's Quality Enhancement Network activities.
- d. The Quality Code Steering Group, which includes representatives of the higher education funding councils, has considered and approved a schedule for review of the components of the Quality Code. A programme for the revision of the subject benchmarks will also commence in 2013.
- e. A consultation on the quality assurance of transnational education (TNE), led by QAA and the UK Higher Education International Unit, was launched in December 2013.
- f. A new reviewer performance feedback and management system which will coincide with the launch of the new Higher Education Review method in early 2014, as well as encourage more dialogue with reviewers through various means including the QAA Annual Reviewer Conference.

Where appropriate, an update on progress regarding these developments will be included in the termly reporting to HEFCE in 2013-14, with a summary of achievements for the operational year being provided in the annual report for 2013-14.

## QAA 586 01/14

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