

The future of quality assessment in higher education

Quality Assessment Review Steering Group

Discussion document

January 2015

Quality Assessment Review

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Summary

The higher education funding bodies in England, Wales and Northern Ireland are inviting views on the future of quality assessment in higher education. This first stage seeks views on the broad purpose, principles and parameters of any future arrangements. A second stage of the review, in the summer of 2015, will address more detailed options, design and implementation issues. It will be for each funding body to decide how to proceed once the discussion and consultation are complete.

Views are invited by noon on Friday 27 February 2015 using the online response form (details below).

Introduction

In October 2014, the higher education (HE) funding bodies in England, Wales and Northern Ireland announced that they were to undertake a joint review of quality assessment arrangements¹. The Scottish Funding Council is reviewing its own arrangements through a separate process, but the four UK funding bodies have agreed to share findings and views.

The UK higher education system is economically and socially important, and has a worldwide reputation for excellence. This is in large part a result of the quality assurance system, which includes universities' and colleges' own robust quality assurance arrangements as well as the funding bodies' quality assessment approaches.

We want to maintain and enhance that reputation. In order to do so, we need to ensure that quality assessment arrangements remain fit for purpose in each country within the UK. They need to retain the confidence of students, employers, government and the wider public, not only in 2015 but looking forward to 2025, when the sector, and the contexts in which it is competing, are likely to look very different.

This review provides an opportunity to step back and ask some important questions of higher education providers, of students, of employers, and of other stakeholders in the higher education system, about what quality assessment arrangements should be like in the future. This document aims to stimulate wide-ranging discussion and debate on important high-level issues. Its purpose is to explore the deep, critical questions that need to be addressed before the more practical issues surrounding the design and implementation of any new quality assessment arrangements can be considered. At this stage, therefore, we are asking for your views on the broad purpose, principles and parameters of any future arrangements. The second stage of the review, in the summer of 2015, will address more detailed options, design and implementation issues.

The paper asks a number of questions. They are intended as prompts for reflection, discussion and analysis – **please feel free to respond to as many or as few as you like**. We also ask you to tell us if you think there are other important questions that we need to consider.

¹ The term 'quality assessment' is used throughout this document to refer to the activities undertaken by the funding bodies to fulfil their respective statutory duties: 'assessment' is the term used in the relevant legislation. Its use should not be read as a shift away from the importance of the broader 'quality assurance' system and, in particular, assurance activities within individual institutions across the UK higher education system.

Scope

The funding bodies each hold a statutory duty to ensure that the quality of higher education is assessed appropriately. The activities necessary to fulfil this duty form the core focus for our review of quality assessment arrangements. However, the national picture is more complex than this might suggest, because a number of quality-related activities – for example the external examining system – fall outside the current scope of the funding bodies' statutory duty.

We believe that it is important to provide stakeholders with an opportunity to consider and discuss the full range of issues and activities, rather than to limit debate too narrowly to those that fall within the statutory duties of the funding bodies – not least so that we avoid unnecessary duplication of activities in the future. It is for this reason that this first document is deliberately wide-ranging. In the second consultation document we will set out clear options for the scope of future quality assessment activities and the way in which these are underpinned by the powers provided through the statutory and other duties of the funding bodies.

How to respond

Please respond by noon on Friday 27 February 2015 using the online form at www.hefce.ac.uk/whatwedo/lt/qa/review/discussion.

Further information

For more information about the quality assessment review, including a timeline and a list of events, is on the HEFCE website at www.hefce.ac.uk/whatwedo/lt/qa/review/.

Areas for discussion

We have identified a number of areas for consideration:

1. Trends and developments in higher education over the next decade, and their implications for future quality assessment arrangements (**Questions 1 to 3**).
2. The high-level principles that should underpin future quality assessment arrangements (**Question 4**).
3. The purpose of quality assessment (**Questions 5 and 6**).
4. Approaches to academic standards (**Questions 7 to 9**).
5. The ability of higher education providers to provide necessary assurances for quality assessment activities (**Question 10**).
6. The extent to which a quality assessment system should be differentiated to reflect the diversity of providers and provision (**Questions 11 to 14**).
7. Approaches to dealing with issues when things go wrong (**Questions 15 and 16**).
8. Components of a quality assessment system (**Questions 17 to 19**).

There may well be other areas, and we would welcome views on this (**Question 20**).

1. Context: towards 2025

Much has changed, and will continue to change, since the existing core approach to quality assessment was designed. In particular, funding for undergraduate teaching (and in future for masters courses) is now predominantly provided through government-backed student fee loans in England and tuition fee grants in Wales, rather than through the funding bodies. Meanwhile, in Northern Ireland, while the traditional balance between funding body grants and tuition fee loans endures for local students, large numbers of students from other parts of the UK and outside the EU are now subject to higher fees. Students are accordingly asking questions about the value of their whole academic and related experiences, and about the outcomes and opportunities these provide. The higher education sector in England has been opened up to greater market dynamics in the last five years, creating, among other things, a diverse group of 'alternative providers', while the Student Number Control has been lifted for publicly funded universities and colleges. In Northern Ireland, quality continues to be recognised as a key measure of the success of the student experience, and a single quality assurance framework for higher education will be in place by 2016. In Wales, the Higher Education (Wales) Bill is currently under consideration and will impact directly on future quality assessment arrangements for all provision in designated providers. In Scotland there is also a draft Bill on higher education which is out for consultation, and if enacted will change some aspect of governance in universities there. It seems likely, therefore, that there will be increasing diversity across the UK.

The economic context for at least the next five years is likely to be one of continuing public funding constraints for higher education, although these may differ in degree and kind between the countries of the UK. Providers will need to be agile and innovative if they are to find new markets and develop new types of educational provision for which there will be a demand at home and overseas. Some of this is likely to be done on a collaborative basis with (non-traditional) partners such as employers, private sector investors, and

with overseas institutions and governments. Further exploration and exploitation of the potential of online learning to reach students and employers, both locally and globally, is also likely.

Trends in higher education

As the higher education sector develops over the next decade we believe that the following trends will become increasingly visible and will have implications for our quality assessment requirements:

- a. The **expansion of the higher education sector** will continue, with scope and market opportunities for a greater diversity of providers, provision, place of delivery, and delivery modes. This is already prompting questions about appropriate quality arrangements for new providers and for those established providers seeking to grow their provision in new ways.
- b. **Developments in internet-based higher education provision** are expected to continue as providers exploit the potential of online, distance and blended provision with greater use of embedded social media tools for peer-to-peer learning, accompanied by new arrangements for the assessment and authentication of students. We believe that the new market of MOOC-like provision will evolve: further sophistication of business and pedagogic models are to be expected, not least to increase student numbers and to increase brand awareness globally.
- c. **The reputation and brand of individual providers** is assumed to become ever more important for all aspects of a provider's business. The link between quality and reputation will be something all providers need to manage successfully.
- d. **Student expectations** of their higher education are expected to grow and to cover the full range of experiences and opportunities offered by providers. This will apply also to questions of comparability and consistency of standards, to the continuing worth of UK degrees in the (global) graduate

- employment market, and to how well their study and training (or retraining) prepares them for the kind of career they want.
- e. Employers are likely to demand more **advanced knowledge, expertise and skills**. In England, at undergraduate level, we anticipate a political demand for new kinds of technical/vocational/professional qualifications and new pathways of progression. At postgraduate level we may see more employer co-financed, co-designed and co-delivered masters and doctoral programmes with integrated, interdisciplinary content. If future governments – at Westminster and in the devolved administrations – re-prioritise improvement in the productivity of the existing workforce through a skills agenda, then we may see the return of programmes which straddle different FE/HE levels of outcome in a single offering focused on work-specific vocational or technical competencies.
- f. Some providers – both 'traditional' and 'new' – are already experimenting with **different corporate and legal forms**, with holding companies, or with trust arrangements which include colleges and schools. Registration of wholly owned subsidiaries in more than one country/jurisdiction is also increasing. We expect these developments to gather momentum.
- g. An increasing number of providers are looking to become substantial players in **the global HE market** with multiple presences, including the development of physical campuses, in different jurisdictions. These arrangements can also include local, in-country HE partners which are subject to their own national quality assurance and assessment regimes. This opens up the possibility of international HE providers having a choice of accreditation systems. Transnational education (TNE) may become a major, defining characteristic of a provider rather than just a nice-to-have additional income stream from small-scale validations/franchises, or simply the basis for a student mobility programme.
- h. The **significance of metrics** which contribute to league tables is expected to increase. We have seen the National Student Survey (NSS) exert significant influence as institutions respond to student views about their learning and teaching experience. The NSS and Key Information Sets are being refined through careful piloting with the sector, but are already important sources of information for potential students, employers and other stakeholders through which to inform judgements of comparative quality. While the current Destinations of Leavers from Higher Education (DLHE) Survey has its limitations, we anticipate its perceived value will grow when it is accompanied in the future with much greater granularity of information on salaries of graduates as well as the nature of their jobs. Meanwhile, there is growing international interest in other measures of learning gain. Quality assessment arrangements cannot therefore be considered in isolation – they are but one factor within the overall policy environment which shape institutional behaviours and create incentives to drive up quality.
- Institutions are developing their strategic approaches to these challenges. We wish therefore to explore views about the way in which any future quality assessment arrangements can support this process.

Question 1: Have we identified the trends that you expect to see over the next decade? Have we missed any likely changes that you feel should be included in a discussion about the most appropriate arrangements for quality assessment by 2025?

Question 2: What types of quality assessment arrangements would be necessary to:

- ensure that barriers to institutions implementing their mission or strategic direction of travel over the medium term are minimised?

- ensure that providers are able to be as swift, agile and imaginative in developing new provision as is necessary?
- retain any valuable enablers present in the current system?
- facilitate new (types of) partnership arrangements and other innovative forms of provision?

Question 3: What competitive or reputational advantages do you think the current quality assessment system gives UK HE providers in the international arena which you would want to see retained? Are there disadvantages which you would like to see addressed? How do you think the situation may change over the next ten years? How important is the European quality framework to you?

- b. is based on co-regulation;
- c. provides the necessary accountability, confidence and assurance that students and other stakeholders rightly require from the higher education system;
- d. provides reliable information to support student choices;
- e. facilitates innovation in strategic developments and in learning and teaching approaches;
- f. works well for different missions;
- g. enables providers to be agile and responsive;
- h. is risk-based but responds swiftly where problems are identified and provides for proportionate, escalatory action where necessary;
- i. is clearly bounded, avoids unintended growth, and minimises the bureaucratic burden on providers;
- j. is affordable and cost-effective;
- k. is intelligently operated with understanding of the cultures and norms in the UK higher education sector(s);
- l. incentivises excellence.

2. Principles

The primary responsibility for the quality of education and standards offered across the higher education system lies with each university and college. This is the fundamental principle on which our system is based, and is one that supports and reflects the autonomy of the sector. The funding bodies then assure themselves, through assessment, that providers are indeed discharging this responsibility appropriately and well. This second aspect provides the co-regulation element of the current system.

Beyond these two core principles – of autonomy and co-regulation – are others that may provide appropriate underpinning for future quality assessment arrangements. The following principles have been suggested as those on which any future quality assessment arrangements should be based:

- a. recognises the autonomy of providers and the responsibility of awarding bodies for the quality and standard of awards;

Question 4: Are these the right principles to underpin quality assessment approaches for the next decade? Are any of these principles no longer useful? Are any principles that would be necessary for effective quality assessment in 2025 missing from this list? Are some principles more important than others? How should we manage the tensions between some of these principles?

3. Purpose

Our starting assumption for this review is that the purpose of the quality assessment of education is to incentivise and secure world-leading learning and teaching. If the system that is meant to be assessing the quality of education in our universities and colleges is not enabling and is not recognising world-leading teaching and learning as its primary purpose, then we believe it cannot provide the benefits expected by all stakeholders.

Question 5: What are the characteristics of a quality assessment system that would incentivise, support and recognise outstanding learning and teaching? Should the scrutiny of institutional quality improvement activities be a component of a quality assessment system?

We wish to ensure that the perspectives of key stakeholders are placed at the centre of discussions about the purpose of a quality assessment system. What do the various stakeholders in our higher education system want from a set of quality assessment arrangements?

Question 6: What do stakeholders want from a set of quality assessment arrangements?

- a:** What confidence should **students** expect to take from future quality assessment arrangements?
- b:** What confidence will **employers** seek from future quality assessment arrangements?
- c:** What assurance should **Government and the taxpayer** take from future quality assessment arrangements?
- d:** What value should quality assessment arrangements bring to **higher education providers**?

4. Academic standards

The mechanisms used to ensure that academic standards are set at an appropriate level during programme design and delivery, and that student achievement reaches this level, are a core component of current arrangements and are important both for those with degree awarding powers and for other awarding bodies.

Previous consultations about quality assessment have explored how to demonstrate comparability of standards between providers and between subject areas. It is not clear that a settled view of this issue has been reached in a way that is able to satisfy all key stakeholders. This discussion document is seeking to re-test assumptions about the importance or otherwise of demonstrating a reasonable degree of comparability of standards in an increasingly diverse system with different types of provision, and, if desired, the mechanisms that might be appropriate to achieve this.

We are particularly interested in views about the respective roles of the external examining system and the accreditation processes of the Professional, Statutory and Regulatory Bodies (PSRBs) and other awarding bodies, in providing assurances about the standard of awards and about the comparability of those standards across providers.

Question 7: Should we seek to demonstrate to stakeholders that academic standards are comparable between providers? And between subject areas? If so, what assurances should be sought about such comparabilities?

Question 8: What assurances should we seek about the maintenance of academic standards over time? Are there new ways or models of providing such assurance that should be considered? Are current approaches to the assurance of academic standards adequately able to recognise student

learning in a range of contexts, for example during placements, or professional practice?

Question 9: How far should reliance be placed on the external examining system to provide judgements about standards? Is there still a role for it or not? Should it be strengthened? Should there be more of an international dimension to external examining arrangements? How far should reliance be placed on Professional, Statutory and Regulatory Bodies to provide judgements about standards? Are there new ways or models of benchmarking degree standards that we should look at?

5. Organisational capability

We wish to explore the assurances required from different types of higher education provider, at different stages of development, and providers' ability to provide these.

In particular, we are interested in views about the strength of internal governance mechanisms, particularly in core academic areas. For example, the lifting of the student numbers cap in England has caused the Westminster Government to worry about the quality of the students' experience – in part at least an academic quality issue. HEFCE's response to this concern has been to seek to place further reliance on internal governance mechanisms while monitoring carefully the recruitment data that would indicate early signs of concern.

Question 10: How far is it possible to place further reliance on an institution's own internal governance mechanisms and approaches to provide the assurances necessary for a quality assessment system?

Views are also sought about the desirability of maintaining one quality assessment system for all types of provider at all stages of their development. Providers may apply to enter the publicly funded sector or for course and institutional designation. Providers may also wish to extend their powers, through an application for degree awarding powers or university title. It has been suggested that we may need one quality assessment system to operate a threshold for providers approaching these hurdles, but a very different approach for those who have already crossed the threshold requirements successfully.

We are also interested in views on the use of external reference points as a core element of quality assessment approaches, and in particular whether the current reference points – the Quality Code and Subject Benchmark Statements – will still be helpful in 2025 both for those seeking to enter the sector and for those already established within it.

Question 11: Can one concept of 'quality' still hold good? One external quality assessment system? For all providers? At all stages of their development?

Question 12: We currently have criteria – expressed in the Quality Code and tested through review conducted on behalf of the funding bodies by the Quality Assurance Agency for Higher Education – for those seeking entry to the higher education sector (if their Home/EU students are to be eligible for fee loans). In your view is that 'threshold' bar currently set too high, too low, or is it about right? Do you prefer a low initial threshold with more scrutiny thereafter, or a higher threshold with less scrutiny thereafter? Should the threshold test include outcome measures as well as process measures; just process measures; or just outcome measures?

Question 13: Is there a case for cyclical review, against identical criteria, of all providers in the sector, regardless of their track record and performance or not? If so, what should its purpose be? If so, should this process be one conducted by the institution itself? Or should it be internal with an external verification that it has been done well? Or should it be external and completely independent of the provider?

Question 14: What should the purposes of the Quality Code and Subject Benchmark Statements be, if any, ten years from now? Are these the right external reference points around which providers should continue to design and review their academic provision in the forthcoming decade?

6. When things go wrong

A core component of any quality assessment system is its ability to identify, investigate and resolve any issues or problems that emerge within a provider, where these become visible or are raised by students, by staff, by examiners or accreditors, or by other stakeholders. The first responsibility to resolve any issues lies with the provider, but we believe that it is important to have a strong, independent and externally based review where persistent, serious or systemic concerns have been raised about the integrity of academic standards or the quality of the students' learning experience.

Question 15: What evidence and/or data should be used to identify quality issues in an individual provider? What assurance should providers give about their policies and approaches to handling these issues and the lessons learned/improvements made? Should quality assessment

arrangements involve a mechanism to intervene where evidence suggests there are persistent, serious, or systemic problems in the quality of education or the standards provided? What should the range of consequences or sanctions be in cases where any issues or problems are confirmed by an investigation?

Question 16: Should there be a mechanism to pick up any sector-wide issues of quality or standards which could be improved? If so, how should this best be done? Conversely, should there be a formal, sector-wide mechanism for disseminating good practice in learning and teaching, and enabling its uptake? If so, how should this best be done?

7. Components of a quality assessment system

Our final set of questions explores some high-level issues relating to potential approaches for a future quality assessment system.

Question 17: The current premise is that a provider is a single corporate actor in which quality and standards assurance arrangements – such as academic regulations, or monitoring and review processes – have to be applied identically and consistently to all degree programmes at the same level, wherever delivered. Does this continue to make sense in the next decade in the context of an increasing diversity of provision? Is it inhibiting pedagogic developments in different disciplines? Inhibiting collaboration? Or does it make it easier to develop, for example, multi-disciplinary programmes?

We are interested in views about whether, and if so to what extent, a UK quality assessment system should consider activities taking place outside the UK.

Question 18: Should a revised quality assessment system include scrutiny of activities taking place outside the UK? Should HE providers in the UK be given a choice of accreditation processes and accreditation agencies including some emanating from, for example, North America or Australia? Should we recognise them officially in some way? What recognition should we give to quality assessment or assurance systems in other jurisdictions where UK providers are actively delivering higher education courses?

Question 19: Does the current quality assessment system represent good value for money in your view? Which elements, if any, of the current arrangements represent value for money? Which, if any, do not?

Finally:

Question 20: Are the questions posed in this discussion document the right ones for the context set out above? Are there other deep questions that are missing from this discussion document?

Next steps

A series of events will take place between January and March 2015 to discuss responses to this discussion document. Details can be found on the HEFCE website

www.hefce.ac.uk/whatwedo/lt/ga/review/events/

A second document will be published in the summer of 2015. This will consult on more specific proposals, options and/or models.

Freedom of Information Act 2000

All responses may be disclosed on request, under the terms of the Freedom of Information Act. The Act gives a public right of access to any information held by a public authority, in this case HEFCE. We have a responsibility to decide whether any responses to this document, including information about your identity, should be made public or treated as confidential. We can refuse to disclose information only in exceptional circumstances. This means that responses to this document are unlikely to be treated as confidential except in very particular circumstances. Further information about the Act is available at www.ico.org.uk.

Analysis of responses

We will commit to read, record, and analyse the views of every response to this document in a consistent manner. For reasons of practicality, usually a fair and balanced summary of responses rather than the individual responses themselves will inform any decision made. In most cases the merit of the arguments made is likely to be given more weight than the number of times the same point is made. Responses from organisations or representative bodies which have high relevance or interest in the area under review, or are likely to be impacted upon most by the issues raised, are likely to carry more weight than those with little or none.

We will publish an analysis of the responses and an explanation of how the responses were considered in our subsequent decision. Where we have not been able to respond to a significant and material issue raised, we will usually explain the reasons for this.