

July 2010/17

Policy development

Report on consultation

This report is for information

This document sets out the principles and objectives that will apply to the quality assurance system for higher education in England and Northern Ireland from academic year 2011-12. It also sets out the broad characteristics of the institutional audit method to be used in England and Northern Ireland from 2011-12.

Future arrangements for quality assurance in England and Northern Ireland

Outcomes of consultation



Department for
**Employment
and Learning**
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Future arrangements for quality assurance in England and Northern Ireland: Outcomes of consultation

Title	Future arrangements for quality assurance in England and Northern Ireland: Outcomes of consultation
To	Heads of HEFCE-funded institutions Heads of universities in Northern Ireland Heads of SFA-funded further education colleges
Of interest to those responsible for	Institutional staff responsible for quality assurance Student union officers Funding councils and institutional representative bodies in Scotland and Wales Other bodies with an interest in quality assurance of higher education, including employer bodies and professional, statutory and regulatory bodies
Reference	2010/17
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Executive summary

Purpose

1. This document sets out the principles and objectives that will apply to the quality assurance system for higher education in England and Northern Ireland from 2011-12. It also sets out the broad characteristics of the institutional audit method to be used in higher education institutions (HEIs) in England and Northern Ireland from 2011-12. This document has been agreed by the representative bodies for higher education (Universities UK (UUK) and GuildHE) and funders (HEFCE and the Department for Employment and Learning (in Northern Ireland)(DEL)), with the advice and guidance of the Quality Assurance Agency for Higher Education (QAA).

2. This document takes full account of the responses made to the joint UUK/GuildHE/HEFCE/DEL consultation 'Future arrangements for quality assurance in England and Northern Ireland' (HEFCE 2009/47), which are summarised in Annex A.

Key points

3. The sponsoring bodies (HEFCE, DEL, UUK, GuildHE) are committed to a quality assurance system that is accountable, rigorous, transparent, flexible, responsive and public-facing. We want to tackle concerns about quality and standards and make real changes to improve the student experience and the reputation of higher education.

4. We received very full responses to the consultation, from a wide range of stakeholders including higher education institutions, student unions, further education colleges and other interested parties.

5. Broadly, the majority of respondents agreed to the proposals set out in the consultation. However, there were significant areas of concern that warranted further consideration in the light of responses, and a number of areas requiring further clarification or adjustment. Taking these into account, we will proceed with arrangements for the quality assurance system to apply from 2011-12 as follows.

Principles and objectives of the quality assurance system

6. The principles and objectives set out in Annex B will apply to the quality assurance system from 2011-12. The sponsoring bodies will ask QAA to ensure that the revised institutional audit method to be used from 2011-12 meets these principles and objectives. QAA will also consider the principles and objectives in revising the tools used to maintain quality and standards (the Academic Infrastructure) and the method for reviewing higher education in further education colleges from 2012-13.

7. As far as reasonably possible, the revised system should be of no increased overall level of demand, ensuring that maximum funding is devoted directly to learning and teaching.

Characteristics of institutional audit

8. QAA, in discussion with the HEFCE/UUK/GuildHE Quality in Higher Education Group and the sponsoring bodies as appropriate, will develop an operational description for a more flexible and responsive form of institutional audit. As well as common criteria against which institutions

will be judged, all institutional audits will also include a thematic element which will vary from time to time. The results of the themes will not be part of the formal judgement.

9. The sponsoring bodies will ask QAA to ensure that the operational description for institutional audit explains clearly how the process will work, including how changes to the method and choices of theme will be communicated. QAA will discuss the operational description with the sponsoring bodies and with the Quality in HE Group as appropriate. QAA will consult the sector on the operational description in autumn 2010.

10. The Quality in HE Group will take a robust, evidence-based approach to any changes made in the audit method, having due regard for institutional concerns about comparability and demands on resources, and discussing options with QAA as appropriate.

11. The Quality in HE Group will publish a protocol setting out: how 'minor' and 'substantive' changes to the audit method will be selected and implemented; and how themes will be selected, including how institutional mission and focus should/can be taken into account in choosing these.

12. We are committed to full student engagement in the quality assurance process, including through the use of student auditors as full members of audit teams. UUK and GuildHE will continue to work with the National Union of Students, QAA and others to support student engagement.

Maintenance of standards

13. The sponsoring bodies will ask QAA, in discussion with the Quality in HE Group as appropriate, to ensure that the terms 'standards' and 'threshold standards' are clearly defined in all relevant documentation and to consider how institutional audit provides public assurance that threshold standards are being met.

14. QAA and other partners will also ensure that there is appropriate public guidance on how standards in higher education are set and maintained. UUK has published on its web-site an explanation of how standards are maintained¹.

15. UUK and GuildHE will publish in December 2010 the outcomes of their review of the external examining system. QAA will also publish later this year the results of its evaluation of the Academic Infrastructure.

Judgement terminology

16. The consultation responses agreed that the terminology of QAA judgements on provision could be clearer. The sponsoring bodies will ask QAA to review the terms it uses to describe the level of confidence expressed in audit judgements in the revised audit method, in particular considering the potential negative consequences of any system that can be used for 'league tables'. QAA will also consider how a judgement might be updated, for example once an institution has taken appropriate action to address concerns.

¹ 'Policy statement on standards', available from

www.universitiesuk.ac.uk/PolicyAndResearch/PolicyAreas/QualityAssurance/Documents/UUK%20Policy%20statement%20on%20standards.pdf.

Judgement on information published by institutions

17. Respondents to the consultation agreed that improvements could be made to published information. HEFCE, UUK and GuildHE will publish a consultation on such improvements in autumn 2010, which will be informed by advice from the Higher Education Public Information Steering Group (HEPISG, formerly the Teaching Quality Information/National Student Survey steering group). The HEPISG will carefully consider the responses to the current consultation which relate to public information.

18. The Quality in HE Group and QAA will take respondents' comments and the outcomes of the public information consultation into account in considering how to operate a published judgement in this area.

Summaries of institutional audit reports

19. The sponsoring bodies will ask QAA to produce 'plain English' summaries of institutional audit reports. In doing so QAA should carefully consider the intended audience, taking respondents' comments and advice from the HEPISG into consideration as appropriate.

Further suggestions

20. In response to a final open question, suggestions for further actions included: improving public understanding of the quality assurance system; developing the role of professional, statutory and regulatory bodies; and clarifying the role of academic staff in quality assurance. These suggestions will be taken forward by the sponsoring bodies, the Quality in HE Group and QAA as the new quality assurance system is developed.

Action required

21. No action is required.

Background

22. In December 2009 HEFCE, the Department for Employment and Learning (in Northern Ireland) (DEL), Universities UK (UUK) and GuildHE, with advice and guidance from the Quality Assurance Agency for Higher Education (QAA), jointly published the consultation document 'Future arrangements for quality assurance in England and Northern Ireland' (HEFCE 2009/47). The consultation set out proposals for revisions to the system used for the quality assurance of higher education (HE) in England and Northern Ireland.

23. HEFCE 2009/47 reflected the need to decide on the quality assurance review method to be used in England's and Northern Ireland's higher education institutions (HEIs) after 2010-11, when the current cycle of institutional audit will be completed.

24. This also provided a valuable opportunity to consider how the wider quality assurance system for higher education, including elements such as the QAA's tools to maintain quality and standards (the Academic Infrastructure) and the role of the external examiner, could maintain its fitness for purpose in the years ahead.

25. The document took account of both the need to assure quality (that is, appropriate and effective teaching, support, assessment and opportunities for learning provided for students) and to maintain threshold standards (that is, the level of achievement that a student has to reach to gain an award). It concentrated in particular on the role of institutions and QAA in doing this, while acknowledging that professional, statutory and regulatory bodies (PSRBs) also play a vital role.

26. The consultation sought views on:

- principles and objectives for the revised quality assurance system
- the outline of a revised institutional audit method to operate from 2011-12, which would be more flexible and transparent and which would provide improved information for a non-specialist audience in clear and accessible terms
- how institutional audit could focus on particular topics, and how these might change over time
- how comparability of standards might be better addressed
- whether the language used to describe the different levels of confidence expressed in audit judgements might be improved
- whether institutional audit should make a judgement (rather than a comment) about the reliance that can be placed on the accuracy and completeness of published information.

27. The intention is that, using a sector-wide approach based on agreed principles, purposes, outputs and outcomes, institutions in England and Northern Ireland will be able to demonstrate clearly that they are operating, and are themselves subject to, robust, effective and transparent quality assurance procedures.

28. Improved public access to verified and useful information on standards and quality will benefit students, employers and society more broadly, and will provide a basis for continued confidence in programmes and awards offered by HEIs.

29. The consultation did not seek to make proposals about the operational detail of any new quality assurance method, because this will rest with QAA, taking the outcomes from the consultation into account. QAA will consult in autumn 2010 on the detail of the operational description for the institutional audit method in HEIs, so there will be a further opportunity for comment then. It is anticipated that QAA will also consult at a later stage on detailed arrangements for a revised method for Integrated Quality and Enhancement Review, the quality assurance method used in further education colleges (FECs), the current cycle of which ends in 2011-12.

30. HEFCE, DEL, Universities UK and GuildHE also arranged two seminars in January 2010 which provided nearly 200 delegates with an opportunity to learn more about the background to the consultation and discuss the issues. Feedback from delegates was very positive, with the opportunity to hear others' views particularly welcomed. Notes from the seminar discussions are available at www.hefce.ac.uk/learning/qual/future.

31. Although institutions were the main audience for the consultation, other groups such as employers, PSRBs and student unions were strongly encouraged to respond.

32. The four sponsoring bodies have jointly established a Quality in HE Group, which met for the first time in February 2010. Its membership includes representatives from the sponsoring bodies, institutions (HEIs and FECs), QAA, Higher Education Academy, Association of Colleges, National Union of Students (NUS), a PSRB and the schools sector. This group will oversee developments in quality assurance and advise the Boards of the sponsoring bodies accordingly. One of its main tasks will be to ensure that recommendations from the consultation are translated into the operation of institutional audit and other aspects of the quality assurance system².

33. The conclusions and recommendations in this paper have been jointly agreed by the Boards of HEFCE (also representing DEL), Universities UK and GuildHE, and by the Quality in HE Group. QAA, the NUS and the Association of Colleges have also had an opportunity to comment.

Results of consultation

Responses received

34. There were 10 questions in the consultation. Questions 1 to 9 offered a multiple choice of responses ('strongly agree', 'agree', 'neither agree nor disagree', 'disagree', 'strongly disagree') and a free text box for comments. Question 10 (an open question asking for any further suggestions) asked only for comments.

35. We received a total of 169 responses from the following respondents:

- 103 HEIs (including one private provider)
- 10 FECs
- eight PSRBs

² Further information on the Quality in HE Group, including papers, membership and terms of reference, is available at www.universitiesuk.ac.uk/PolicyAndResearch/PolicyAreas/QualityAssurance

- 24 representative bodies, including institutional groups and student unions
- two current students of HE
- nine other individuals
- 13 'other', including the University and College Union, Equality Challenge Unit, Higher Education Academy, Staff and Educational Development Association and one private provider with taught degree-awarding powers.

Overview of responses

36. Annex A provides a full analysis of responses by question. What follows is a summary of that analysis, followed by jointly agreed outcomes following recommendations from the Boards of the sponsoring bodies.

Principles and objectives of the quality assurance system

Consultation question 1: Do you agree that the principles in paragraph 31 [of HEFCE 2009/47] are broadly the correct ones on which the revised quality assurance system should be based?

Consultation question 2: Do you agree that the objectives set out in paragraph 32 [of HEFCE 2009/47] are the correct ones for the revised quality assurance system to meet?

37. The consultation document set out overarching principles and key objectives for the new quality assurance system. These are intended to apply to the full range of quality assurance activity, which should be seen as a whole, encompassing not just audits in HEIs and reviews in FECs, but also internal review, the Academic Infrastructure and external examining arrangements. Key points from the analysis were as follows:

- a. The majority of respondents agreed to both the principles and objectives, although 13 per cent neither agreed nor disagreed and 4 per cent disagreed with the objectives. Concerns raised mostly related to how the principles and objectives might be applied in practice.
- b. There was wide support for student engagement, although some respondents also added that student engagement could be difficult to achieve. We expect institutions, QAA and the NUS to continue their excellent work in increasing student engagement in quality assurance, including the inclusion of students on institutional audit teams. Indeed, some helpful suggestions were made about increasing student engagement (for example, in periodic review), and these will be discussed with QAA, Universities UK and GuildHE.
- c. In response to views expressed in the consultation we have:
 - amended the objectives to further clarify the importance of institutional autonomy and institutions' own internal processes. We expect audit teams to continue to take the nature of individual institutions into account, as has always been the case
 - added an objective relating to the importance of employers
 - amended principle e ('Rely on robust evidence-based independent judgement') to clarify that a broad range of evidence should be considered
 - changed the term 'quality improvement' to 'quality enhancement' (principle f).

d. A number of respondents queried the use of the term 'public' as being too general and unspecific. We are using the term 'public' as a shorthand term to mean a wider interest group, including potential students, their advisers and the media. However we acknowledge the difficulty of using this as a term and will look to QAA to take a more targeted approach in considering the different constituents of a potential audience when looking at published information. The results of the review recently carried out by the Higher Education Public Information Steering Group (HEPISG – formerly the Teaching Quality Information/National Student Survey steering group) will also help to clarify who information users are.

e. Where there was disagreement with the principles and objectives, in the main it related to: a wish to make amendments as discussed above; concerns that there was too much focus on public information; or concerns that the system could become disproportionate. Institutions agreed that communication about quality and standards was important but should not detract from the primary purpose of securing quality and standards and enhancing quality. We agree that QAA should be asked to take this into consideration.

38. The Boards of the sponsoring bodies have therefore:

- approved the revised principles and objectives set out in Annex B to apply to the quality assurance system from 2011-12
- agreed that in developing an operational description for the new institutional audit method, QAA should ensure that the new audit method meets the revised principles and objectives
- agreed that more generally, QAA should ensure that it considers the revised principles and objectives in revising the Academic Infrastructure and the method for reviewing HE in FECs
- agreed that the HEPISG should be asked to carefully consider the responses relating to public information as part of its review and indicate how a useful and comparable data set might be produced.

Characteristics of institutional audit

Consultation question 3: Do you agree that the broad characteristics set out in paragraph 38 [of HEFCE 2009/47] are the right ones to consider when revising the institutional audit method?

Consultation question 4: Do you agree that institutional audit should be more flexible, focusing both on key areas common to all institutions, plus additional topics to be determined as necessary?

Consultation question 9: Do you agree that institutional audits should be organised on a rolling basis rather than in a fixed cycle? If you agree, what would be your definition of a minor change to procedure, compared to a more substantive revision?

39. Comments made in response to these three questions showed a good deal of overlap, so they are being considered together here.

40. Question 3 set out some proposed characteristics of a revised institutional audit method. Sixty-eight per cent of respondents agreed to the proposals but a significant minority (20 per

cent) neither agreed nor disagreed, reflecting uncertainty as to how implementing the characteristics would work in practice.

41. Question 4 suggested that while a revised audit method could focus on key areas common to all institutions, additional themes or topics could be introduced that would enable audit to respond to particular challenges identified in the quality assurance system. Seventy-three per cent of all respondents agreed to the proposals, including 14 per cent (8 per cent of HEIs) strongly agreeing. Again, a significant minority, including 24 per cent of HEIs, neither agreed nor disagreed, reflecting uncertainty as to how the themes would be chosen and how the approach would be implemented. Twelve per cent of HEIs disagreed or strongly disagreed with the proposal, considering it disproportionate and/or inequitable.

42. Question 9 suggested that audit should move away from the fixed-cycle approach, which made it difficult to introduce changes before the end of the cycle, to a 'rolling programme' in which the method could be constantly updated in order to remain fit for purpose. The consultation proposed that 'substantive' changes would be subject to consultation with the sector while 'minor' changes to the method could be introduced without consultation but subject to deliberation in the Quality in HE Group. As a supplementary question, respondents were asked what they would consider to be a minor or substantive change (their suggestions are in Annex A).

43. Question 9 received the least clear endorsement from the sector. While half of the respondents agreed or strongly agreed, a third neither agreed nor disagreed, being unsure how decisions would be made or how the system would operate in practice. Twenty-one per cent of HEIs (22 in total) disagreed with the proposal, albeit only one of these disagreed strongly.

44. Key points raised across questions 3, 4 and 9 were:

a. As shown by the high proportion of 'neither agree nor disagree' responses to all three questions, there is not yet sufficient clarity over how the new audit method will work in practice for respondents to form a clear view. In particular, mechanisms need to be determined for selecting themes for enquiry and for agreeing ongoing changes to the audit method. QAA, in partnership with the sponsoring bodies and the Quality in HE Group, will work on this and ensure that the operational description is clear on these points.

b. Many respondents commented on the need to balance flexibility with comparability. If the audit process were changed, it is difficult to see how an institution audited after the change could be compared to one audited before. We recognise these concerns, but we consider it is important to develop a more responsive and hence sustainable system that continues to command widespread confidence. The Quality in HE Group, which includes sector representation, will take its responsibility for making changes very seriously, and will publish a protocol setting out how it will do this.

c. Many HEIs were particularly concerned that the results of a thematic enquiry in their institution might feed into comments or judgements. The subject of the enquiry was expected to change regularly, so it was felt that feeding its results into comments or judgements would be neither equitable nor fair because institutions would not be judged on the same thing and judgements would not be comparable. In response to these concerns, we will ask QAA to confirm that although thematic enquiries should attract a published comment, and we would expect the institution to address any problems

identified as a result, they will not form part of the formal judgements. Judgements will be made only on a central set of criteria common to all institutions. However we expect that enough enquiries will be carried out to provide useful good practice for the sector, a point raised by several respondents.

d. A further suggestion was that thematic enquiries should not be part of audit at all, but rather should be undertaken as separate, national enquiries. We consider that they should, however, be part of the audit method and not a standalone exercise; a separate exercise would result in additional resource demands, and while the themes will change they will be considered very much as part of that individual institution's work.

e. A frequent comment was that changes to themes or to the audit method more generally should be made on the basis of robust evidence that they would be beneficial; the sponsoring bodies and Quality in HE Group would need to resist making changes as 'knee-jerk' responses to media speculation. There was also a risk of overburdening institutions if changes were made too frequently or insufficient notice given. We agree with this point and will look to the Quality in HE Group to ensure that any decisions as to changes are fully evidence-based, and that sufficient notice is given, although this should not be to the detriment of timely review.

f. Some HEIs had interpreted thematic enquiries as being a response to problems and suggested that QAA's existing Causes for Concern process³ was a more appropriate mechanism for dealing with this. We do not agree that the Causes for Concern scheme will be sufficient for addressing the range of issues that could be explored through audit. The thematic element is intended to consider wider aspects of challenge and development for the sector. It should not be assumed that an institution being investigated under a particular theme is considered to be underperforming in that area.

g. Many respondents considered that thematic enquiries could have a developmental or enhancement aspect. While we hope this will be the case, as with audit in general, we do not think that this should be the sole focus of a thematic enquiry because we would expect action to be taken if any problems were found. A few institutions suggested that themes might be tailored to a particular institution to take note of its mission and circumstances, and some commented that not all 'generic' themes would apply to all institutions, such as small or specialist providers. Some respondents queried whether themes might be discussed and agreed with the HEI in advance.

h. Many institutions were concerned that responding to frequent change might place an unacceptable demand on institutions. A common remark was that if a theme were added, then something else in the audit method would have to be removed to make way for it. We reassert our commitment, set out in the proposed audit characteristics, to ensure that the new method is 'as far as reasonably possible, of no increased level of demand'. Some respondents objected to the use of this phrase because it potentially allowed further increases in demand. We acknowledge this but consider that it would be impossible to guarantee absolutely no increase in resource demand across the sector as a whole. However, we remain concerned that the revised system must be efficient and

³ QAA's Causes for Concern process is published at www.qaa.ac.uk/causesforconcern

proportionate. We also acknowledge the point raised by some respondents, including PSRBs, that audit should continue to take account of evidence raised by other reviews (Ofsted, PSRB accreditation and others) and agree that in planning for audit, QAA should try as far as possible to avoid clashes with other organisations' activity. The HE Better Regulation Group, which has an oversight of regulatory burden on the HE sector, will have an interest in this issue.

i. Several respondents felt that a risk-based approach should be considered (for example an institution that performed well in an audit might receive a lighter touch the next time or have longer gaps between audits). The existing system takes some account of risk, in that institutions that receive limited or no confidence will receive follow-up action. However, we consider that a wholly risk-based approach would require the development of a new process and metrics to determine the level of risk. This would require considerable investment in time and resources and could not be achieved by 2011. We are therefore not considering this approach at the moment.

45. Following analysis of these comments we recognise the importance that institutions attach to comparability of the outcomes from audit. However, we also recognise that circumstances may change over time and that some degree of flexibility may be needed to reflect a changing context in higher education. We do not wish to see the creation of an unstable and unfair system, and accordingly we will seek:

- a strong and published protocol, to be developed by the Quality in HE Group, on minor and substantive changes
- an acceptable notice period for changes
- a clear set of common criteria on which institutions will be judged
- communication of thematic results without their being part of the formal judgement
- a more focused core, so that the overall demands on HEIs are not increased, so far as possible.

46. The Boards of the sponsoring bodies have therefore agreed that:

a. QAA should be asked to ensure that the operational description for institutional audit explains clearly how the process will work. Where appropriate, QAA should discuss this with the sponsoring bodies and with the Quality in HE Group. In particular, the operational description should set out:

- how procedural changes to the audit method will be identified and communicated
- the common criteria against which institutions will be judged
- that all institutional audits will include a thematic element
- how themes will be communicated to the institution
- how the results of themes will be communicated (without being part of the formal judgement)
- how information from other sources will be incorporated.

b. The Quality in HE Group should be asked to ensure it takes a robust, evidence-based approach to any changes made in the audit method, having due regard for institutional concerns about comparability and demands on resources, and discussing options with QAA as appropriate. In particular it should consider:

- how 'minor' and 'substantive' changes will be selected and implemented
- how themes will be selected, and how institutional mission and focus should/could be taken into account in choosing these.

Comparability of standards

Consultation question 5: Do you agree that QAA should be asked to consider how comparability of standards might be better addressed in institutional audit and the Academic Infrastructure?

47. The term 'standards' refers to the level of achievement that a student has to reach to gain an award. Sixty-eight per cent of respondents agreed with question 5; however, there were some significant concerns. Comments were as follows:

a. The consultation document showed confusion between the terms 'standards' and 'threshold standards'. The terms should be better defined, not least to avoid public confusion. We agree with this.

b. Respondents generally agreed that consideration of threshold standards that applied to all HEIs was appropriate, but a small number of HEIs had serious concerns that this kind of language would not help them compete on an international stage. Many respondents were concerned that looking in greater detail would require subject-level scrutiny and risk the creation of a 'national curriculum'; we consider this ruled out by the principles and objectives relating to autonomy and efficiency/proportionality. (An exception to this view came from a number of student unions, who considered that comparability of standards across disciplines could be useful.)

c. The importance of the Academic Infrastructure and/or of the external examiner system in maintaining the comparability of standards was stressed by many respondents, and PSRBs drew attention to their role in this regard.

d. One contributing factor to a lack of public confidence in standards was the lack of public understanding about how standards were set and maintained in the HE sector.

48. Work is already under way relating to standards, including QAA's evaluation of the Academic Infrastructure, and UUK/GuildHE's review of external examining. The comments made in relation to this question will be passed on to those leading these work strands. The issue relating to public understanding has been taken up by Universities UK, which has published a statement relating to standards⁴, and which will continue to work with QAA to support public understanding.

49. The Boards of the sponsoring bodies have therefore agreed that QAA should be asked to:

⁴ 'Policy statement on standards', available from www.universitiesuk.ac.uk/PolicyAndResearch/PolicyAreas/QualityAssurance/Documents/UUK%20Policy%20statement%20on%20standards.pdf.

- ensure that the terms ‘standards’ and ‘threshold standards’ are clearly defined in all relevant documentation
- consider how institutional audit provides public assurance that threshold standards are being met, taking into account the responsibility of institutions for the standards of awards made in their name
- in consultation with partners (in particular colleagues responsible for communication), ensure that there is appropriate public guidance on how standards in higher education are set and maintained.

We would expect QAA to involve the Quality in HE Group in its considerations in this regard.

Judgement terminology

Consultation question 6: Do you agree that QAA should be asked to review the terms it uses to describe the different levels of confidence expressed in audit judgements?

50. The consultation document outlined difficulties with the terms currently used in audit judgements (that is, ‘confidence’, ‘limited confidence’ and ‘no confidence’) and asked if these should be reviewed. The vast majority of respondents (84 per cent) agreed – 32 per cent strongly agreed.

51. ‘Limited confidence’ was identified as a particularly problematic term that implied that an institution was failing when in fact it was still operating above an acceptable standards threshold. Respondents also commented that in a three-tier judgement system where, in practice, most institutions received ‘confidence’, inevitably the few institutions which received ‘limited confidence’, regardless of how serious the issue was, became the focus of negative attention.

52. Difficulties with public understanding and the need for more descriptive terms, albeit terms that could not be used to form league tables, were raised. Several suggestions for alternative terms were given, although there was no consensus on this. Some suggested that qualifiers could be attached to judgements to indicate the strength attached to additional recommendations for action.

53. The Boards of the sponsoring bodies agreed that QAA should be asked to review the terms it uses to describe the level of confidence expressed in audit judgements in the revised audit method. This should make the judgements easier to understand. In doing so, QAA should consider:

- the potential negative consequences of any system which can be used for ‘league tables’
- the ability to update a judgement, for example once an institution has taken appropriate action to address concerns.

Judgement on information published by institutions

Consultation question 7: Subject to sector agreement on the data that the institution makes available to inform prospective students and other interested parties about the quality of its educational provision and the standards of its awards: Do you agree that institutional audit should make a judgement about the reliance that can reasonably be placed on the accuracy and completeness of this information?

54. Question 7 followed a proposal that, given the increased priority of providing accurate information to the public about higher education, the accuracy and completeness of the information that an institution publishes about the quality and standards of its awards should attract a judgement in audit rather than a comment, as is now the case. This would be an important development because, if the data were considered to be inaccurate, HEFCE would have the power to demand further action, including, in extreme situations, to withdraw funding⁵. The proposal clearly set out that the move from 'comment' to 'judgement' would only take place once the sector agreed on a data set, and so would not apply from the beginning of the revised method in 2011-12.

55. Sixty-two per cent of respondents (54 per cent of HEIs) agreed or strongly agreed to this question but 20 per cent (25 per cent of HEIs) neither agreed nor disagreed and a further 20 per cent (20 per cent of HEIs) disagreed, five of those strongly. Although no HEI could envisage a situation in which inaccurate or incomplete data were acceptable, many respondents felt unable to agree with the proposal until they knew what the content of this data set would be. Many also remarked that, although public information was important, they could envisage significant difficulty in reaching an agreement on a comparable sector-wide data set.

56. The HEPISG will consider the issue of a comparable data set at length as part of its review of public information needs, supported by research by Oakleigh Consulting. The sector will be consulted on the proposed data set in a joint HEFCE/UUK/GuildHE consultation in autumn 2010. The Quality in HE Group will then, in discussion with QAA, take the outcomes of the consultation into account in considering how to operate a published judgement in this area.

57. Several respondents expressed concern about how this element of audit would work in practice, particularly with the consideration of increased demands on resources, and requested clarification on whether it was the information itself that would be audited or the institutions' own processes for checking it. The HEPISG, Quality in HE Group and QAA will take all of these comments into account.

58. Some FECs noted the difficulties of comparing Higher Education Statistics Agency (HESA) data and Data Service individualised learner record data. We acknowledge that this continues to be a challenge, and look to the HEPISG to consider this in its review.

59. The Boards of the sponsoring bodies agreed that:

- a. The HEPISG should take the comments raised under this part of the consultation into account in its review.
- b. The Quality in HE Group, in discussion with QAA, should be asked to take these comments and also the outcomes of the public information consultation into account in considering how to operate a published judgement in this area.

Summaries of institutional audit reports

Consultation question 8: Do you agree that QAA should provide summaries of institutional audit reports for a non-specialist audience?

⁵ For more information see 'Policy for addressing unsatisfactory quality in institutions' (HEFCE 2009/31). All HEFCE publications are available at www.hefce.ac.uk/pubs

60. The consultation asked whether QAA should provide summaries of institutional audit reports for a non-specialist audience, in response to the growing priority of meeting public information needs and building public confidence in quality and standards.

61. Although the majority of respondents (75 per cent) agreed or strongly agreed, a number of key points were raised:

- a. Although the technical aspects of an audit report may be hard to understand for non-specialists, they do have a genuine use for quality assurance professionals, and this should not be lost.
- b. If a plain English summary is to be prepared, there needs to be clarity over who it is being prepared for, and therefore what information should be included.
- c. There are potentially several audiences who would be interested in a summary – for example academic staff, current students, potential students and the wider public. These audiences are all likely to want different things, but preparing a variety of different documents would be burdensome and should be avoided. One interesting suggestion was that the student auditor should prepare a summary document for a student audience.

62. The Boards of the sponsoring bodies agreed that QAA should be asked to produce plain English summaries of institutional audit findings. In doing so they should carefully consider the intended audience, taking respondents' comments and advice from the HEPISG into consideration as appropriate.

Further suggestions

Consultation question 10: This document [HEFCE 2009/47] has set out a number of ways in which we might improve the quality assurance system, to make it more accountable, rigorous, transparent, flexible, responsive and public-facing. Is there more that we might do? If so, please give details.

63. Question 10 was an open question and as would be expected, the responses were very varied. Many used it to amplify views that they had already given in response to other questions, and so which have already been discussed in this report (in particular, quality enhancement, administrative demands and risk).

64. The biggest single issue was improving public understanding of the quality assurance system. A number of the recommendations already laid out in this report would contribute to that, such as asking QAA to consider the language used in judgements. In addition, QAA has already embarked on a concerted strategy to improve its approach to public communication, for example an improved web-site and podcasts. UUK has improved its web-site so as to better explain the quality assurance system.

65. Another important issue concerned PSRBs. The general view was that the consultation might have made more of their important role. A number of respondents suggested that there should be more clarity of role and less duplication between institutional audit and PSRB accreditation, and that the system should be seen as more of a whole. QAA is already working closely with PSRBs through its PSRB forum, and we will pass on the specific ideas raised in this consultation to that group. The Higher Education Better Regulation Group also has a strong interest, and we have passed on the consultation responses to its secretariat in the hope that it will also be able to take forward specific ideas.

66. Specific suggestions about the training of institutional audit teams, the Academic Infrastructure, and the involvement of academic staff in quality assurance have been passed onto QAA for its consideration. QAA will also wish to take up an offer from HESA for better working together on data sharing.

Next steps

67. The revised principles are set out in Annex B. They will apply to all developments within the quality assurance system from 2011-12 including:

- audit and review methods including the revised method for the quality assurance of HE in FECs to apply from 2012-13
- developments of the wider system such as revisions to public information, the UK-wide Academic Infrastructure and external examining arrangements.

68. The sponsoring bodies will draw on the outcomes of the consultation to draft a formal specification for the audit method to apply from academic year 2011-12.

69. The sponsoring bodies will ask QAA to develop the operational description for the revised institutional audit method according to this specification.

70. QAA will produce a detailed operational description for institutional audit to apply from academic year 2011-12, explaining how the expectations and outcomes of the process will be achieved in practice. This will include details of the issues to be assessed, the potential sources of evidence and an account of the arrangements for publication of the findings.

71. QAA will consult the sector on this operational description in autumn 2010. Taking the results of this consultation into account, in early 2011 QAA will publish a revised operational description and a handbook for institutions, auditors and others offering guidance on how audits will be conducted.

72. The Quality in HE Group will continue to oversee and advise on developments in quality assurance. At its future meetings it will consider how to take forward the appropriate recommendations in this document, and will also consider a draft of the QAA operational description.

73. The HEPISG will consider the outcomes of its current review in July and will make recommendations to the sponsor bodies on the basis of a consultation document on the nature of the information to be published by institutions. This will be informed by the results of research carried out earlier in 2010 and by the recommendations in this paper, and will be a joint consultation prepared and published by HEFCE, GuildHE and UUK in autumn 2010.

Annex A

Question-by-question analysis

Consultation question 1: Do you agree that the principles in paragraph 31 [of HEFCE 2009/47] are broadly the correct ones on which the revised quality assurance system should be based?

Respondent group	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Higher education institution (HEI)	9	84	3	7	0
Further education college (FEC)	2	8	0	0	0
Professional, statutory or regulatory body (PSRB)	6	2	0	0	0
Representative body	4	17	2	0	0
Individual	0	6	0	3	0
Current student of higher education	2	0	0	0	0
Other	0	10	0	1	0
Total	23	127	5	11	0
Percentage	14%	77%	3%	7%	0%

1.1 A large number of respondents agreed that the principles were broadly correct and that they represented a suitable balance of the different priorities that the quality assurance system would need to address in the future. This was often qualified with caveats:

- a. In particular, it was noted that, because the principles were quite broad and general, they were hard to disagree with.
- b. Several respondents also noted that the key issue was how the principles would be turned into specific proposals, and that this was the area where greatest scrutiny was needed.
- c. Student unions were overwhelmingly supportive of the principles but were clear that it was important to ensure that student needs were properly investigated and identified and that there should be student union involvement in quality assurance processes.

1.2 Many respondents talked about the relative importance and priority of the principles. A few of these queried the level of priority given to each of the principles and, although it was usually recognised that the list was explicitly not in priority order, some respondents suggested

alternative orders or that the introduction of relative levels of priority would be beneficial. Key issues coming out of these broad discussions about levels of priority were that:

- a. It was understandable that there was a focus in the principles on the communication of information about quality and standards, but this should not detract from the primary purpose of securing quality and standards.
- b. Quality enhancement was an important part of the 'system' and not enough priority was placed on it in the consultation. A large number of institutions specifically objected to the phrase 'quality improvement' as not sufficiently recognising the existing high levels of quality in the sector and many suggested that this should be replaced by the term 'quality enhancement' as a more widely understood and appropriate term.

1.3 Respondents suggested several alternative or additional principles that should be included, although each suggestion did not necessarily have a large number of sponsors. Key suggestions were:

- a. A principle was needed that showed that the quality assurance system gave an appropriate level of priority to the autonomous nature of the higher education (HE) sector, and signalled how that autonomy related to responsibility for quality and the setting of standards. This was a frequent request from HEI respondents who indicated that the current principles did not make this clear enough. Although a number of respondents acknowledged that institutional autonomy was present within the objectives related to principle f, they indicated that it was so important that it should be the focus of a principle.
- b. There should be a principle that showed that the quality assurance system should be explicitly evidence-based. This was felt to be important in relation to the communication of the robustness of the process, and was seen by some to be a broader, more appropriate phrase than 'rely on independent judgement'.
- c. There should be a principle that showed that the quality assurance system sufficiently reflected the diversity of the HE system and hence ensured that any resultant assurance activity was proportionate. A number of institutions, particularly those that were smaller or with a particular focus, indicated that it was important that a 'one size fits all' method was not envisaged, but that there was a proportionate response to the justifiable differences in the sector in any method developed.
- d. There should be a principle that specifically referenced the importance of, and reliance on, institutions' own internal processes within the quality assurance system. Respondents felt that this was particularly important, to highlight the level of existing activity within the sector and to reflect the seriousness with which institutions take this responsibility.
- e. There should be a principle that explicitly recognised the need to ensure that excessive resource demands and/or bureaucracy were avoided in any new quality assurance method, particularly in times of financial pressure on institutions. Indeed, some argued for a reduction in such demand.

1.4 A number of respondents suggested alternative wording or clarifications to existing principles, this included:

- a. The need to qualify principle d ('Meets the needs of students'). Some respondents felt that the unspecified nature of 'needs' meant this principle was not sufficiently defined or focused and failed to recognise the limits of the quality assurance system in its ability to meet some of the needs of students. Some felt that a more appropriate wording would refer to the 'student experience'. One respondent thought it was important to talk in terms of the needs of 'all' students to emphasise the need for inclusion.
- b. A few respondents suggested that other stakeholders' needs should be identified alongside funding bodies, institutions and students in principles c and d. In particular some employer bodies raised the need to recognise the needs of employers.
- c. Many respondents thought that the wording of principle e ('Rely on independent judgement') should be changed. Some were concerned that the use of the term 'rely' implied that independent judgement was the only factor used, whereas in reality a range of evidence and factors are considered. Some felt that the principle was not sufficiently clear about who the judgement was from and how it was independent. One suggestion was made for an alternative wording of 'independent academic judgement' in order to emphasise that this was informed expert judgement.

Consultation question 2: Do you agree that the objectives set out in paragraph 32 [of HEFCE 2009/47] are the correct ones for the revised quality assurance system to meet?

Respondent group	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
HEI	6	74	18	5	0
FEC	3	7	0	0	0
PSRB	2	6	0	0	0
Representative body	3	16	4	0	0
Individual	0	7	0	0	2
Current student of higher education	1	1	0	0	0
Other	1	8	0	1	0
Total	16	119	22	6	2
Percentage	10%	72%	13%	4%	1%

2.1 A large number of respondents agreed that the proposed objectives were the correct ones for the revised quality assurance system. In particular some respondents welcomed the recognition of institutional autonomy and the need for the system to work efficiently, and the engagement of students in the quality process. As with the principles addressed in question 1, caveats were often applied to this agreement, particularly in relation to how these would be translated into operational detail and the relative levels of priority afforded to each objective.

2.2 One issue noted by several respondents was that there seemed to be a lot of objectives which appeared to have the potential to conflict with each other. As a result some respondents questioned whether it was realistic that they could all be achieved, or whether they could all be achieved to the same extent.

2.3 Many respondents repeated issues set out in response to question 1. These included the need to ensure:

- reduction in cost and/or bureaucracy in any new processes
- that any new system appropriately reflects the diversity of the sector and is proportionate
- that the focus on quality enhancement was maintained and that the term 'enhancement' was preferred to 'improvement'
- appropriate focus on institutions' own internal quality assurance processes.

2.4 Alongside these general issues, a number of key specific issues were raised by a few respondents:

a. The need to be 'realistic' about levels of student engagement. Although many respondents (particularly student unions) welcomed the focus on the engagement of students, many others (particularly HEIs) were keen to ensure that this was acknowledged as potentially quite difficult to achieve and not an area that should become subject to specific measurement. Reasons cited included the very different levels of motivation that students have for engagement and the difficulty sometimes experienced in securing that engagement.

b. The difficulty in providing public information on a consistent and comparable basis. Student unions firmly supported this objective. But a number of HEIs expressed the view that achieving it might be difficult given the sector's diversity and the volume and complexity of information concerned, and said it was important not to overload students with information.

c. The need to better understand public expectations and the difficulties in meeting them. A number of respondents queried the use of the term 'public' as being too general and unspecified, and highlighted the subsequent difficulty in understanding and meeting the expectations of such a diverse group.

d. The need to clarify the objectives flowing from principle e relating to independent judgement and internal/external review. A number of respondents found these objectives unclear as to what was meant by the terms 'internal' and 'external' reviews, and who, in the context of these objectives, the 'independent reviewers' were. Some queried whether this was meant to reflect the work of PSRBs, an area that was noted by many to be of great importance in terms of ensuring fit with wider quality assurance processes and in terms of the need to avoid duplication and unnecessary demand.

e. The need to better explain threshold standards. Both in relation to this question and to question 1, a number of respondents felt there was a lack of clarity throughout the document about the term 'threshold standards' and even the term 'standards' itself, with the two sometimes appearing to be used interchangeably and not sufficiently clearly defined. This was thought of great importance to public understanding, in particular in

relation to who was responsible for what and what expectations could reasonably be had about comparability of standards.

f. The specific tension between flexibility and responsiveness and the need for comparability of outcome and robustness of consideration. Although some respondents acknowledged that it was important that developments in quality assurance responded to changing demands and public priorities, some concerns were raised that this created tension with ensuring comparability of outcomes and processes and could, if handled inappropriately, compromise the robustness and rigour of the process.

g. For FECs delivering HE, the difficulties of returning data in two different ways through the Higher Education Statistics Agency (HESA) and individualised learner record (ILR). A number of FECs, both in relation to this question and question 1, raised an issue that the differences between HESA returns and ILR meant data were non-comparable, and that this would be a particular difficulty in relation to any new developments in public information about quality.

Consultation question 3: Do you agree that the broad characteristics set out in paragraph 38 [of HEFCE 2009/47] are the right ones to consider when revising the institutional audit method?

Respondent group	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
HEI	8	58	23	10	3
FEC	3	6	1	0	0
PSRB	2	4	2	1	0
Representative body	3	16	4	0	0
Individual	1	3	1	2	2
Current student of higher education	1	1	0	0	0
Other	1	7	2	1	0
Total	19	95	33	13	5
Percentage	11%	57%	20%	8%	3%

3.1 A majority of all respondents, and nearly all responses from student unions, agreed that the broad characteristics set out in paragraph 38 of HEFCE 2009/47 were the right ones to consider when revising the institutional audit method. In particular some respondents welcomed the intention to provide better explanations, and the commitment to not increasing the overall level of demand. As with questions 1 and 2, agreement was often subject to caveats relating to how the characteristics would be interpreted in the practical implication of the method.

3.2 A number of general suggestions were made as to other characteristics that should have been considered: a few felt that a risk-based approach should be considered more actively; others felt enhancement of the student learning experience should be cited as a characteristic.

3.3 In relation to the first characteristic ('more proactive and flexible, able to investigate particular themes or concerns should the need arise') a number of respondents (particularly HEIs) could see the benefits in this approach in enabling a swift response to pressing concerns or important issues. But a large proportion of respondents expressed concerns about how this would work in practice:

a. In particular a large number of HEI respondents were concerned that any element of audit that was introduced on a flexible basis would then form part of a judgement in the outcome of their audit. Many thought this would not be equitable or fair, and fed into a broader concern that the more flexible the method became, the harder it would be to pursue comparability.

b. A few respondents expressed concern that too much flexibility might contribute to increasing levels of confusion both in the public and in the sector as to what was required in audit.

c. A number of respondents expressed concerns that there were real dangers of a more flexible system becoming too driven by media speculation and hype, and that there needed to be a clear, evidence-based process for identifying any themes introduced in a more flexible element of audit.

d. A few institutions interpreted this characteristic as being equivalent to the existing Quality Assurance Agency for Higher Education (QAA) Causes for Concern process and did not feel that it offered anything that this existing process did not already have in place.

e. Some respondents suggested that a flexible element of audit should be seen as an enhancement or developmental element, within the audit process but separate from the areas on which a judgement is made. This was seen as way of enabling the audit process to investigate particular areas but without compromising comparability or equity.

3.4 In relation to the second characteristic ('better explained and presented in reports and handbooks, with the public as a principal audience, using simpler language') a large number of respondents agreed that there was clearly a need to consider making language around audit more accessible for particular audiences.

3.5 Several respondents, however, questioned whether handbooks needed to be revised because the public were not the principal audience for them, and that technical language was appropriate for handbooks, given that they were aimed at a technical audience.

3.6 More generally, a large number of HEI respondents expressed some concern that a more nuanced approach to thinking about audience needed to be taken in thinking about communications. In particular it was often argued that there were a range of audiences for information about audit (not easily captured in the generic term 'public') that might need different forms of communication and that the technical needs of institutions should not be forgotten in the desire to meet these broader needs. This was seen by a small number of respondents as being particularly important in ensuring that enhancement of learning and teaching could arise from

audit processes, as the provision of nuanced and detailed information was an important pre-requisite to enabling such enhancement activity.

3.7 In relation to the third characteristic ('clearer about the importance attached to the provision of robust and comparable information by institutions') respondents made relatively few specific comments, with several referring to answers given to later, more specific proposals in this area in relation to question 7 in the consultation document. A few respondents explained that their broad agreement to the principle depended on the nature of the information concerned, and said further sector consultation was needed on what the information might be. A few respondents expressed concerns that any information should not feed into 'metrics' or league tables and a few expressed the wish that any new initiatives in this area did not generate additional cost or resource demand.

3.8 In relation to the fourth characteristic ('clearer about the comparability of threshold standards between institutions, including the vital role of the Academic Infrastructure in supporting this') a wide range of views were expressed by respondents from a range of different perspectives. Some strongly disagreed that this was an appropriate characteristic of institutional audit; this links to arguments made in response to question 5.

3.9 Many respondents felt that the practical application of this characteristic would be particularly challenging. A number questioned whether the Academic Infrastructure was the right mechanism for achieving the characteristic at all, suggesting the external examiner system was a more appropriate tool. Some suggested that the Academic Infrastructure was a key factor in addressing this issue, with others cautioning that although important, it was only a partial solution.

3.10 Other concerns raised with this characteristic included the difficulties in comparing standards between institutions, with some respondents suggesting that it was not possible to do so and that standards should only be assessed as appropriate to the awarding institution. Related to this was a concern that there would be an explicit judgement on comparability of standards, and that this would not be possible.

3.11 On the final characteristic ('as far as reasonably possible, of no increased overall level of demand, ensuring that maximum funding is devoted directly to learning and teaching') a large number of respondents agreed that this was a very important characteristic, particularly given the current financial position of the HE sector and possible future funding cuts. A number of respondents objected to the use of the phrase 'as far as reasonably possible' claiming that this essentially allowed for increases in demands on them at a time when they were already under significant pressure and requested a commitment to no increases (or even a reduction) in demands on them.

3.12 Some PSRBs suggested that in institutional audit, QAA should draw on evidence from PSRB accreditation in a more formal way.

Consultation question 4: Do you agree that institutional audit should be more flexible, focusing both on key areas common to all institutions, plus additional topics to be determined as necessary?

Respondent group	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
HEI	8	58	25	10	2
FEC	4	5	1	0	0
PSRB	2	6	0	0	0
Representative body	6	14	2	1	0
Individual	2	5	2	0	0
Current student of higher education	0	2	0	0	0
Other	1	8	2	0	0
Total	23	98	32	11	2
Percentage	14%	59%	19%	7%	1%

4.1 This question followed the suggestion that audit could focus on key areas common to all institutions, with a reassertion of a commitment to the use of the Academic Infrastructure, but that additional themes or topics could be introduced. Some suggestions were outlined for these themes, such as academic misconduct or provision of feedback. The consultation document also suggested an institutional focus in choosing themes. The rationale was that audit could respond to institutional or national need in a more flexible manner than is the case with the current audit method.

4.2 A substantial number of respondents of all types felt that there was not enough detail for how the new themes would be selected – what the criteria would be, who would determine them, what the timeframe would be and hence what notice institutions would receive. It was crucial that this was fully transparent, and ideally subject to consultation with the sector. Many comments also highlighted the importance of choosing themes based on robust evidence of need, as opposed to a ‘knee-jerk’ reaction prompted by government or media concern.

4.3 Many respondents commented on the need to balance flexibility with comparability. The need to maintain comparability between audits was seen by most respondents as being of crucial importance, and many felt that introducing different themes put this at risk. There was also a concern that an institution might have a weakness in a particular theme area, but this would be missed if that theme happened not to be applied to that institution. There was also a risk of confusing a wider audience if it was not made clear why some institutions had received scrutiny under a particular theme and some had not.

4.4 Linked to this, many number of respondents commented that if the theme was included in a formal judgement, this increased the likelihood of non-comparability. Many suggested therefore

that themes should only attract a comment, with judgements being restricted to the 'core' activity common to all institutions.

4.5 HEIs in particular were concerned at the potential financial and resource costs of additional themes – both for institutions and auditors – in the audit itself and in preparing for audit. It would be important to have sufficient notice of a change of theme. A common remark was that if a theme were added, then something else in audit would have to go, to make room for it.

4.6 Many respondents welcomed the developmental potential of a thematic approach, with some comparing it to the developmental engagement element of Integrated Quality and Enhancement Review (IQER). It was seen as an opportunity for self-evaluation, to address weak or problematic areas, and also had the potential to identify good practice that could be disseminated across the sector.

4.7 Several HEI respondents supported an institution-specific approach in which institutions could pick their own areas for thematic investigation, related to their mission and circumstances. This could help to avoid a 'one size fits all' approach and perhaps allow more proportionality of scrutiny. Certain themes might be appropriate to a small or specialist institution. Conversely, care was needed not to 'categorise' an institution inappropriately. Several student unions suggested that students could also help to identify areas of interest. Some FECs wanted more information about how they might be affected by a thematic investigation in a partner HEI.

4.8 A few HEIs did not favour a thematic approach in institutional audit, but instead suggested that 'thematic reviews' could be undertaken nationally as a separate exercise. This could either involve visits or could be desk-based. The advantage of this would be to provide an overview of the whole sector for a particular theme, rather than a sample. If themes did change between institutions then the samples needed to be large enough to be statistically significant.

4.9 Although most respondents favoured a change to a more flexible approach, a few wished to maintain the existing cycle and did not support the introduction of themes, noting that the existing Causes for Concern process could be used to address particular problems and that continual change would not help to restore confidence in quality assurance.

4.10 Some HEIs compared the approach to the themes used in the Scottish methodology. The need to take account of other processes, such as PSRB accreditation and Ofsted inspections, in planning audit engagements was mentioned. One PSRB respondent suggested that PSRBs could have a role in advising on themes.

4.11 Some respondents queried, made additions to, or disagreed with the list of suggested themes in paragraph 40 of HEFCE 2009/47 (the list was not intended to be comprehensive). The reassertion of commitment to the Academic Infrastructure in paragraph 42 of HEFCE 2009/47 was generally welcomed.

Consultation question 5: Do you agree that QAA should be asked to consider how comparability of standards might be better addressed in institutional audit and the Academic Infrastructure?

Respondent group	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
HEI	11	50	19	17	6
FEC	3	4	3	0	0
PSRB	1	6	0	1	0
Representative body	7	13	3	0	0
Individual	3	3	0	1	2
Current student of higher education	0	1	1	0	0
Other	3	7	1	0	0
Total	28	84	27	19	8
Percentage	17%	51%	16%	11%	5%

5.1 Many respondents, in particular HEIs, were content that QAA should look at the broad comparability offered by the scrutiny of threshold standards. However, there was considerable minority disagreement, mainly from HEIs.

5.2 Consideration of standards in greater detail would mean looking across disciplines which, as well as being very difficult, would be overly prescriptive and verge on a 'national curriculum'. An exception to this view came from a few student unions, which took the view that comparability of standards across disciplines as well as across institutions would be useful for potential students. A large number of HEIs commented that comparability of standards across disciplines was the role of the external examiner system rather than QAA, although a few noted that no external examiner could take a national view across a discipline. Several respondents cautioned against a return to subject review.

5.3 The need to balance comparability with institutional autonomy and diversity was mentioned by several respondents, noting that comparability was not always possible or even appropriate.

5.4 Respondents across all categories commented on the usefulness of the Academic Infrastructure. While many acknowledged that there were ways in which it could be revised and strengthened (and referred to the QAA evaluation already under way that would help to address this), there was general agreement that, used properly and consistently, the Academic Infrastructure was a powerful tool for maintaining standards.

5.5 Several HEIs commented that although the elements of the quality assurance system mentioned in paragraph 45 of HEFCE 2009/47 (the Academic Infrastructure, external examiners and PSRB reviews) were important and should be maintained, they should not be increased in importance to the point at which they became regulations and institutional autonomy was

threatened. These respondents felt that any quality assurance mechanism should not interfere with HEIs' internal processes; and indeed it was the processes for setting standards, including use of the Academic Infrastructure, that should be the subject of a review method, not the standards themselves.

5.6 Several respondents of all types suggested that it was not so much lack of specific comparability that was a problem as the fact that the wider public did not understand how standards were applied in HE, nor the processes by which they were assessed. The diversity that made comparability difficult should be celebrated. These respondents suggested that if these issues were better explained to the public, then comparability might be less of an issue.

5.7 Some PSRBs suggested that evidence from their accreditation reviews could provide some useful comparisons across disciplines; some suggested that accreditation status could be added to published information. HESA data was also suggested as a useful resource.

Consultation question 6: Do you agree that QAA should be asked to review the terms it uses to describe the different levels of confidence expressed in audit judgements?

Respondent group	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
HEI	27	60	14	1	1
FEC	6	2	2	0	0
PSRB	3	5	0	0	0
Representative body	10	8	2	3	0
Individual	5	3	0	1	0
Current student of higher education	0	2	0	0	0
Other	3	7	1	1	0
Total	54	87	19	6	1
Percentage	32%	52%	11%	4%	1%

6.1 A strong majority of respondents agreed that QAA should review the terms it uses to describe the different levels of confidence expressed in audit judgements in order to accurately reflect the range of audit outcomes that could be reported and to ensure that the language used is less open to misunderstanding. This was often qualified with caveats. In particular it was noted that the terms should be more descriptive and their meaning made more obvious. A number of respondents, including the National Union of Students (NUS), said the existing terms offer too much ambiguity for institutions and, particularly, the public.

6.2 Several respondents noted that extreme care was taken in the wording of current judgements to ensure that they remained valid for the life of the audit cycle, and that these same considerations should underpin any proposed changes.

6.3 A high proportion of respondents raised the concern of introducing more granularity/quantitative grading in judgements which could lead to inappropriate use of league tables to compare institutions – something that had been apparent during the subject review cycle.

6.4 A high proportion of respondents commented on current terminology being unhelpful and misunderstood, particularly in relation to the judgement of ‘limited confidence’. It was generally agreed that ‘limited confidence’ might be taken to imply that an institution does not meet acceptable levels of quality or standards both by the sector and the public. The restriction of a three-tier judgement, where most institutions secure the same outcome, will inevitably focus negative attention on those judgements that appear more critical, regardless of the rationale for this, and how serious the issue is. To this end a number of respondents suggested alternative wording/judgements such as:

- complete confidence; substantial confidence; limited confidence; little confidence; no confidence
- exceeds threshold – where standards are secure and only minor developmental action is recommended; meets threshold – where standards are secure though developmental action is recommended; below threshold – where academic standards are not considered secure and immediate action is required
- OFSTED gradings (excellent; good; satisfactory; unsatisfactory)
- approved; approved with recommendations; not approved.

6.5 Several respondents noted that a better explanation of the current audit system could address the issue of politicians and the public not having confidence in a system that awards most institutions a ‘pass’. It needs to be explained that all institutions should achieve the benchmark.

6.6 Several respondents, including the NUS, put forward the idea of greater graduation in the ‘confidence’ grading. They felt this would promote greater public confidence through increased transparency, understanding that quality is different across the sector and recognising excellence in terms of managing quality and standards. However, a number of HEIs were cautious, because this might lead to misleading league tables.

6.7 Alongside these general issues, a number of key specific issues were raised by a number of respondents:

- a. There should be a process whereby an HEI can remedy a limited or no confidence statement within the six-year cycle. The current system does not take into account changes that take place as a result of a review which improve the level of confidence through continuous improvement.
- b. Relating a judgement to ‘likely future’ management is an informed guess. Perhaps it may be better to have a judgement simply on the ‘soundness’ of an HEI’s management?

c. An introduction of additional gradings could increase pressure for consistency of judgements by the audit teams, so it would be difficult to ensure comparability across the sector.

Consultation question 7: Subject to sector agreement on the data that the institution makes available to inform prospective students and other interested parties about the quality of its educational provision and the standards of its awards: Do you agree that institutional audit should make a judgement about the reliance that can reasonably be placed on the accuracy and completeness of this information?

Respondent group	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
HEI	5	51	26	16	5
FEC	1	7	2	0	0
PSRB	2	2	2	1	1
Representative body	9	10	2	2	0
Individual	2	5	0	0	2
Current student of higher education	1	0	0	1	0
Other	2	7	1	1	0
Total	22	82	33	21	8
Percentage	13%	49%	20%	13%	5%

7.1 The majority of respondents agreed that, subject to sector agreement on the data set, institutional audit should make a judgement about the reliance placed on the accuracy and completeness of public information. But a high proportion of these respondents noted that reaching common sector-wide data definitions would be very difficult and that clear guidelines would be required on institutions' expectations and the interpretation that should be offered by audit teams to ensure the judgements are consistent. Respondents thought that it would be difficult to identify reliable and meaningful data sets that are genuinely comparable and informative.

7.2 Many respondents felt unable to comment on the question (hence the high proportion of 'neither agree nor disagree' responses) until there had been agreement on the nature and extent of the proposed data sets that should be made publicly available.

7.3 Many respondents noted that the criteria relating to data presentation must be clear and unambiguous to ensure that statistical information presented by institutions is directly comparable. Where ambiguity prevails, the data presented will mislead rather than inform.

7.4 It was generally agreed by institutions and student unions that students should have confidence in the accuracy and completeness of the information provided by institutions and that this should be comparable across the sector.

7.5 A few respondents felt that current procedures, whereby audits comment on published data, are adequate. The sector as a whole should, however, consider how data that already exist could be made more easily available and comprehensive to the public.

7.6 Several respondents had concerns with regard to QAA's audit team carrying out this work. Concerns included:

- a. It would be important to ensure that auditors had the technical skills and knowledge to make judgements on such matters as the systematic auditing of data because this would require different skills from the rest of audit. This may mean that QAA would need to bring in specialists to carry out separate data audit exercises.
- b. The length of time taken to complete data audits would significantly increase the time taken to complete the institutional audit.
- c. The cost implications of an extended audit and use of data specialists.

7.7 A few respondents requested further clarification on whether audit would scrutinise the data, the way in which the institution presented the data or the institution's process for checking the data. Auditors could make judgements about an institution's processes for ensuring the accuracy of its information rather than the accuracy of the information itself. It would be more beneficial for an agreed set of institutional key performance indicators to be published in an accessible format to provide comparable and accurate information about HEI performance.

7.8 Many respondents felt that it would be inappropriate for audit teams to be asked to consider the accuracy of complex data sets that have already undergone detailed scrutiny by, for example, HEFCE, HESA, the National Student Survey and the Destinations of Leavers from HE survey.

7.9 A few respondents noted that data sets can present a challenge to smaller institutions because data can be skewed by small numbers or discounted as statistically insignificant. Safeguards would be needed to ensure this could not result in a judgement on incomplete data.

7.10 Alongside these general issues, the following key specific issues were raised by a number of respondents:

- a. Public information is updated by institutions each year, whereas an audit judgement could stand for up to six years. The judgement will need to reflect the current situation.
- b. The review of public information should take place outside the audit process (or alongside it by an independent specialist team). The review should also find out what the public really do want to see published.
- c. Contact hours: regarding conventional teaching hours as an implicit measure of quality seems increasingly untenable in a context where programmes are delivered through work-based learning or using web-based technologies.

d. Institutions should not face any additional demands on finances or resources as a result of this process.

Consultation question 8: Do you agree that QAA should provide summaries of institutional audit reports for a non-specialist audience?

Respondent group	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
HEI	20	53	20	9	1
FEC	2	4	3	1	0
PSRB	2	5	1	0	0
Representative body	16	4	2	0	0
Individual	3	3	2	0	1
Current student of higher education	0	1	0	1	0
Other	6	5	1	0	0
Total	49	75	29	11	2
Percentage	30%	45%	17%	7%	1%

8.1 Most respondents agreed that QAA should provide summaries of institutional audit reports for non-specialist audiences.

8.2 However, many respondents noted that translating a specialist report for a non-specialist audience could result in misinterpretation, at worst providing a document so general as to give no useful information at all. They pointed out that ‘non-specialist’ is potentially a very wide group including employers, PSRBs, prospective students and careers counsellors, so it may be difficult to find a ‘one size fits all’ approach. There would be a need to guard against multiple summaries for different audiences and/or bland statements because that could lead to different meanings or nuances.

8.3 It was also suggested that there needs to be clearer evidence for demand for such summaries: several respondents queried whether there is a substantial demand for public information about institutional audits. The starting point should be to assess what sort of information the public wants and then to consider how this can best be provided, rather than assuming that audit can satisfy these wants if only its outcomes are presented in an accessible manner.

8.4 Linked to this, many respondents commented on the usefulness of the technical content of audit reports and said these should remain in place because they are very valuable in informing follow-up improvement and enhancement activities for institutions. They are also used by specialists in institutions for benchmarking and sharing of good practice purposes. These

reports will inevitably have to be written in a technical language that is not immediately accessible to non-specialists.

8.5 Many institutions, including the NUS, agreed that it was fundamental to identify what information on the quality of provision is needed by prospective students and their parents, and how the institutional audit process meets this need. Reports can then be tailored to the audience.

8.6 Several institutional respondents noted that institutions should have the right to review the draft summary to ensure that there are no unintended interpretations. Institutions should be closely consulted in relation to the distillation process, with a means of appeal if necessary, given the significant reputational damage that could flow from any flawed reduction of complex material into simple messages for wider public consumption.

8.7 Respondents' preference was for a detailed report that gives the institution clear information and guidance on areas that require improvement, and a public report that presents just the judgements. Other suggestions were:

- a. QAA could develop summaries of existing reports in various formats and try them out on different audiences to see whether they were easily and correctly understood.
- b. Institutions themselves could produce summaries of their reports which were then validated by QAA.
- c. As students become more involved as auditors, they might be best placed to develop or comment on summaries written for a public/student audience.

Consultation question 9: Do you agree that institutional audits should be organised on a rolling basis rather than in a fixed cycle? If you agree, what would be your definition of a minor change to procedure, compared to a more substantive revision?

Respondent group	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
HEI	2	50	29	21	1
FEC	1	1	7	1	0
PSRB	2	5	1	0	0
Representative body	4	9	4	4	0
Individual	2	0	5	2	0
Current student of higher education	0	0	2	0	0
Other	2	6	3	0	0
Total	13	71	51	28	1
Percentage	8%	43%	31%	17%	1%

9.1 This question followed a suggestion that the fixed-cycle approach, in which all institutions were audited in the same way over a set period, should be abandoned in favour of a rolling approach in which the audit method could be constantly updated in order to remain fit for purpose. Substantive changes to the method would be subject to consultation with the sector, whereas minor changes could be agreed by the newly formed group overseeing the quality assurance system.

9.2 Overwhelmingly, the main concern expressed across all types of respondents was the risk to comparability between institutions in the face of a constantly changing process.

9.3 Some respondents appeared to be confused between the suggestion to make general changes to the audit method and the proposal in question 4 to introduce a thematic approach to audit. These respondents reiterated the need for a 'core plus' approach to maintain consistency of judgements. The approaches are linked in that they are both intended to increase the flexibility of the method, but the thematic enquiries are only part of this.

9.4 Several HEIs, while content with the overall principle of increased flexibility, were anxious that changes should not be made too frequently and urged that the Quality in HE Group should robustly resist this. They felt there was a risk that an institution might be overburdened by having to adapt to change too often; this could divert resources away from teaching and learning. Many respondents stressed that any changes should be made on the basis of robust evidence of need, and above all that sufficient notice should be given of any change prior to it affecting the HEI (notice periods of one year to 18 months were suggested, but some non-HEI respondents thought the existing notice period was too long).

9.5 Several respondents wanted more detail about how changes would be determined and by whom. If a 'minor' change was made that did not require consultation, what would happen if there was not consensus for the change in the sector? Respondents considered that there should be a mechanism for such changes to be challenged. However, a few respondents thought that the decision could be left to the Quality in HE Group, QAA and/or the sponsor bodies.

9.6 With substantive changes, some respondents suggested that a similar approach to that taken with including students on audit teams should be adopted: as well as a sufficient notice period, there should be a trial period from which HEIs could 'opt out' if they wished.

9.7 Those respondents in favour of a rolling cycle suggested that it would encourage more responsiveness to the changing needs of the sector and stakeholders (this view was particularly strongly expressed by student unions), support enhancement activity and help to ensure the longevity of the system. Some felt that there was scope for a more risk-based approach in which institutions that performed well could receive a more light-touch method and/or be audited less frequently.

9.8 A few respondents felt that the existing cycle was satisfactory and there was no need to move away from it, particularly because many of them had received more than one audit in six years in any case. An FEC was concerned that any rolling cycle should still take note of Ofsted activity.

Substantive and minor changes

9.9 In commenting on what constituted 'substantive' and 'minor' changes, respondents put forward the following suggestions:

- a. Substantive changes would be changes to:
- anything that affected the outcomes or judgements of audit (this was the most frequent suggestion)
 - the composition of the audit teams (although some non-HEI respondents did not think this constituted a substantive change)
 - the main audit principles and objectives, or methodology
 - core audit topics
 - the length of the audit engagement
 - the materials/preparation/overall resources required from the HEI
 - anything that affected consistency or comparability between audits
 - frequency of audit
 - the notice period
 - criteria for determining hybrid or collaborative provision
 - the nature of QAA's engagement with the institution
 - the institution's compensation and condonement policy
 - the evidence sources used (for example moving from secondary to primary evidence; the contribution of other quality assurance procedures)
 - engagement with external examiners, for example including them in visit meetings
 - the level of scrutiny, in proportion to institutional size.
- b. Minor changes would include:
- revisions to the additional topics, for example discipline or thematic trails (some suggested that QAA could publish a list of possible themes for the year)
 - changes to the basic operation of the process without a change in basic principles
 - revising the time between audits in response to the judgements received (in other words, those requiring more improvement might be audited more frequently)
 - anything that would not change the audit structure, audit timetable or broad comparability.

Consultation question 10: This document [HEFCE 2009/47] has set out a number of ways in which we might improve the quality assurance system, to make it more accountable, rigorous, transparent, flexible, responsive and public-facing. Is there more that we might do? If so, please give details.

10.1 Additional views were given by 124 respondents in response to this question. These comprised 77 HEIs, seven FECs, 11 PSRBs, 13 representative bodies, seven individuals, one current student and eight categorised as 'other'.

10.2 As would be expected, the responses were very varied. Many used it to amplify views they had already given in response to other questions.

10.3 A number of respondents specifically looked forward to seeing the detail in the following consultation to be led by QAA, noting that converting general statements into detailed proposals was often difficult and controversial.

Improving public understanding of the quality assurance system

10.4 The biggest single issue was improving the public understanding of the quality assurance system; this was mentioned by 17 respondents, including student unions, HEIs and other bodies.

10.5 Ideas included:

- using more accessible, less outdated language
- improving the QAA web-site
- giving reports or summaries a much higher profile ('perhaps not on QAA web-site, or elsewhere as well as QAA web-site')
- encouragement to HEIs 'to explain in clear and accessible terms the way in which their individual quality assurance mechanisms operate'
- the sector being less defensive and more positive in describing what it offers and its methodologies. The 1994 Group considered that there was a role for both QAA and HEIs in explaining the system.

10.6 Five HEIs and the Quality Strategy Network considered that the sector and QAA should raise public awareness of the success of universities, including through publishing more (or better) case studies of good practice. For example, one HEI stated: 'It is important for institutional audit to raise public awareness of the work of universities and of their success in maintaining quality and standards.'

10.7 A small number of respondents considered that the pendulum should not swing too far, and that making the system more public-facing should not compromise its integrity or its usefulness for HEIs. Others, such as the Royal Pharmaceutical Society, noted that public information, for example on contact hours, can be misleading.

Issues mentioned by eight respondents or more

Administrative requirements, and fears that the new method might increase these

10.8 This was mentioned by seven HEIs, a student union, the Staff and Educational Development Association (SEDA) and an individual.

10.9 It was frequently set in the context of funding cuts. A typical response from an HEI states: 'The aspiration for better communication and greater transparency needs to be balanced against available resources so that the new audit method does not place an additional burden on institutions.'

10.10 A few argued not just for no additional increase in required resources, but specifically for a reduction, in order to conserve and focus resource even more efficiently on teaching, learning, assessment and the student experience.

Quality enhancement

10.11 This was mentioned by six higher education institutions, one student union and three representative bodies. It was felt that HEFCE 2009/47 did not place sufficient emphasis on this important focus which had been developed during the current audit cycle.

10.12 For example, one HEI thought that the new method should incorporate the opportunity to feed back informally from institutional audit, and that the Higher Education Academy might be involved in supporting an institution in 'build[ing] on such insights and to pursue audit recommendations'. Another suggested: 'You should try to ensure that the audit process is less like a tick-box exercise, and try and find ways of enabling audit teams to engage in a genuine dialogue with institutions about the way they approach quality and standards and the reason for their chosen approach.'

Risk

10.13 At least six higher education institutions (from across very differing institutional types), two individuals and the Quality Strategy Network all mentioned risk. Views differed as to how risk might be assessed and incorporated in the new method, in order to reduce administrative and resource costs. In the main, specific ideas were not given, but rather it was pointed out that risk should have been addressed in the consultation document.

10.14 For example, one HEI stated: 'Whilst we understand the challenges of [a risk-based approach to audit], and indeed accept that there may be a sense of proportionality in that institutions which do not secure a "confidence judgement" are required to undertake additional action, we are disappointed that this is not drawn out more strongly in the consultation document.' Another proposed that 'the schedule of audit visits could be planned on the basis of an assessment of risk by QAA'. On the other hand, another HEI specifically rejected a risk-based approach as unlikely to be sufficiently consistent or robust.

PSRBs

10.15 At least eight respondents, from all respondent types, mentioned professional, statutory and regulatory bodies. The general view was that the consultation might have made more out of their important role. A number of respondents suggested that there should be more clarity of role and less duplication between institutional audit and PSRBs, and that PSRBs should not impose a disproportionate demand on HEIs. Some had specific suggestions, for example that the judgements of PSRBs should be accepted in order to reduce the requirements of institutional audit.

10.16 Some PSRBs had specific ideas. For example, the Royal Pharmaceutical Society of Great Britain suggested: 'The quality assurance system would be better understood if it were described in its entirety. If the public could access QAA audits and PSRB reports from a single source, for example, they would be able to make more informed judgements about not only universities but also disciplines.' BCS, the Chartered Institute for IT, proposed that there should be 'an enhanced role for professional bodies in assuring quality, with, perhaps, QAA assuming an institutional role and professional bodies providing quality assurance at the programme level'. Others set out less specific offers of assistance. For example, the Engineering Council 'would be pleased to work with QAA to maximise the potential of links between the processes of engineering accreditation and quality assurance'.

Whether the quality assurance system was fundamentally flawed

10.17 Institutions from across the sector stated that they did not think that the present quality assurance system was fundamentally flawed, and so significant changes were unnecessary. For example, one wrote that they 'feel strongly that a radical overhaul of the current system would be dangerous, expensive and confusing'. This view was countered by three other higher education institutions who seemed to consider that the consultation might have been more radical, and discussed alternatives to institutional audit. There was little comment on this point from either student unions or other bodies.

The scope of the consultation

10.18 Four higher education institutions emphasised that institutional audit should be seen as part of a wider system, and not considered in isolation. For example, one HEI commented: 'So that there is not over-attention on audit, it will be important for the outcomes of the related review of external examining, public information and the academic infrastructure to be brought together into a coherent, mutually reinforcing whole system.' The Association of Colleges 'would have welcomed a wider discussion on quality assurance as this one is too focused on institutional audit'. Some respondents mentioned IQER (see paragraph 10.19), and two HEIs expressed concern that collaborative provision was not adequately covered in the consultation. Another two wanted to see more on audit of research/postgraduate students.

Integrated Quality Enhancement and Review

10.19 Several FECs specifically mentioned their support for IQER or their disappointment that the consultation did not contain proposals for IQER. Three HEIs said the relationship between IQER and institutional audit needed attention.

Support for increased student involvement in quality assurance mechanisms

10.20 Unsurprisingly this was a theme from a number of student unions, but it was also mentioned by individuals, the 1994 Group, an FEC and a number of universities. In general, the important role laid down for students in the consultation document was welcomed. Indeed, some wanted to do more; for example, one HEI urged QAA to 'go further' on its commitment to student involvement in quality assurance, such as expecting student involvement in periodic review. The Association for Managers in Student Unions Student Reps Group argued that 'students' unions should be fully resourced to fully participate in quality processes at course, institutional and national levels'.

10.21 There were only two dissenting opinions, both with reference to student members of audit teams.

10.22 One very specific concern came from a joint response from an HEI and its student union: they stressed that student representatives in the audit process should be 'clearly recognisable as a student and not, for example, a mature ex-PhD candidate who is employed by another institution in a management/advisory capacity'.

Institutional audit teams

10.23 A number of suggestions were made under this heading, almost all by higher education institutions.

10.24 It was suggested that auditors should be selected from a wide pool representing the diversity of institutions (including small, specialist institutions), and one university proposed that audit teams might include senior non-academic peers.

10.25 Two universities, one professional body and one representative body all mentioned concerns about potential or current variety/inconsistency in the approaches of audit teams.

10.26 Another university was concerned that if the operational description changed, the person specification and job description for auditors should be revised.

Other issues

Academic Infrastructure

10.27 Four HEIs mentioned their support for the process of revising the Academic Infrastructure, to make it less burdensome (for example, making programme specifications optional or removing parts of the Code of Practice) or to embed student involvement. One individual considered that the Academic Infrastructure needed 'fundamental revision so that it focuses primarily on standards, not quality'.

Involvement of staff

10.28 At least four respondents felt that the role of academic staff had been overlooked by the consultation, and that the new arrangements needed to make quality assurance valued by staff and 'not just a tick-box exercise'.

10.29 The University and College Union considered that more attention should be paid by institutional audit to employment issues and staff development in audit. SEDA also considered that the promotion of pedagogic training could be a focus of the audit method.

Data

10.30 HESA made a number of suggestions about how comparable data could be better used to reduce the resource demand on QAA and HEIs, and offered to work with QAA to take ideas forward. A small number of higher education institutions, and one student union, also mentioned the importance of using existing information and data sets, to avoid increasing bureaucracy.

10.31 The Society of Biology was concerned about data quality, and that the data required were not collected.

10.32 One student union considered that students and prospective students would need more detailed information, and so 'QAA should be collating standardised data which means fair comparisons can be made'.

10.33 Some other issues were raised by only one or a very small number of respondents:

- a. The consultation was too inward-looking. We should improve links with the Scottish and Welsh systems. We should also cover the European/international angle, including transnational education.
- b. The inclusion of work-based learning in the consultation was welcome; it should not have its own method or be seen as necessarily problematic.
- c. A statement on how comparability of standards between institutions will be assessed should be developed.

- d. A question needed to be answered about comparability of qualifications from different institutions.
- e. The sector should be more honest about what institutional audit can and cannot deliver.
- f. There is a need to revise the constitution of QAA's Board/fully explore the independence of QAA.
- g. External examining should be improved or strengthened: the Universities UK/Guild HE review under way was welcomed.
- h. Public statements should make less out of the economic value of HE and more of the civil and social benefits.
- i. Quality should not be based upon value for money but on actual enhancement of the learning experience.
- j. Institutional diversity should be challenged (but it was acknowledged that the proliferation of degree-awarding powers compromises quality assurance, in particular comparisons between HEIs).
- k. Other inspections of university provision, by Ofsted for example, should be discontinued as a separate process where QAA may fulfil that role instead.
- l. More attention might be given to the 'responsive' characteristics of a revised system.
- m. Introducing themes and/or flexibility will pose a risk to transparency.
- n. QAA should be 'pushier' and 'more rigorous', and should put pressure on HEIs to include students on periodic review teams (this was suggested both by an HEI and by a student union).
- o. Subject centres played an essential role in quality enhancement and had been overlooked by the consultation.
- p. The consultation did not take sufficient account of equalities issues (including, specifically, disability equality).
- q. There should be Continuing Professional Development opportunities for quality practitioners.
- r. Unistats data should be at UCAS course code level, not Joint Academic Coding System code level.
- s. There should be a method of 'auditing' the auditors, and giving the sector a guarantee that the quality assurance process is appropriately and consistently applied, and that its judgements are valid and reliable.
- t. Audit could:
- look at online/social outputs
 - consider assessment regulations

- take a holistic view and include all teaching and learning interventions, such as student services, libraries
- look at learning, practice and/or outcomes 'not just processes'
- seek the views of postgraduate students and employers
- investigate the student representative system.

10.34 With reference to the logistics of the consultation, the following points were made by universities:

- a. It was important to encourage stakeholders from outside the sector, such as employer groups, to respond.
- b. The implementation timetable was too ambitious.
- c. How had the principles in question 1 been developed?

10.35 The Nursing and Midwifery Council considered that the new Quality in HE Group should have both an employer and a PSRB representative.

Annex B

Revised principles and objectives for quality assurance in England and Northern Ireland

Revisions to the principles and objectives as set out in the consultation document HEFCE 2009/47 are indicated in italics.

The revised system to assure quality and standards should:

a. Provide authoritative, publicly accessible information on academic quality and standards in higher education.

- i Provide timely and readily accessible public information, on a consistent and comparable basis, on the quality and standards of the educational provision for which each institution takes responsibility.
- ii Report results on a robust, consistent and comparable basis that meets public expectations.

b. Command public, employer and other stakeholder confidence.

- i Ensure that any provision that falls below national expectations can be detected and the issues speedily addressed.
- ii Apply transparent processes and judgements, and function in a rigorous, intelligible, proportionate and responsive way.
- iii Assure the threshold standards of awards from higher education institutions in England and Northern Ireland, wherever and however they are delivered.
- iv Explain clearly where responsibilities lie for the quality and standards of provision and how they are secured.

c. Meet the needs of the funding bodies and of institutions.

- i Enable the funding bodies to discharge their statutory responsibilities to assure the quality of the programmes they fund.
- ii *Recognise the role of institutions as independent autonomous bodies responsible for their own quality management systems and for the standards of awards made in their name.*
- iii Enable institutions to discharge their corporate responsibilities, by providing them with information on how well their own internal systems for quality management and setting and maintaining standards are functioning, and identifying areas for improvement.
- iv *Where relevant, recognise the role of employers as co-deliverers of higher education, taking the quality assurance requirements of such provision into account.*

d. Meet the *relevant* needs of *all* students.

- i Have current and prospective students' interests at its heart, underlying all of the other principles.

- ii Engage students in the quality process, whether at course, institutional or national level.
 - iii Focus on the *enhancement* of the students' learning experiences without compromising the accountability element of quality assurance.
- e. Rely on *robust evidence-based independent judgement*.**
- i Incorporate external reviews run by an operationally independent body (the Quality Assurance Agency for Higher Education) and professional, statutory and regulatory bodies.
 - ii *Incorporate evidence from institutions' own internal quality assurance processes, including those which involve external participants.*
 - iii Recognise and support the important role of external examining.
- f. Support a culture of quality *enhancement within institutions*.**
- i Apply a process of external review, both by academic peers and by students, rather than inspection by a professional inspectorate.
 - ii Include processes based on rigorous institutional self-evaluation.
 - iii Promote *quality enhancement* in institutions.
 - iv Enable the dissemination of good practice.
- g. Work effectively and efficiently.**
- i Operate efficiently, in order to avoid disproportionate use of institutional effort and resources which could otherwise be directed to the delivery of frontline student teaching.
 - ii Rely on partnership and co-operation between the institutions, Quality Assurance Agency for Higher Education and the funding bodies.
 - iii Address both quality (appropriate and effective teaching, support, assessment and opportunities for learning provided for students) and standards (levels of achievement that a student has to reach to gain an award) as two distinct but interlinked concepts.
 - iv Work on the principle of collecting information once to use in many ways.
 - v Acknowledge that while the quality assurance system applies to England and Northern Ireland only, it is underpinned by reference tools that are UK-wide.
 - vi Adhere to the Standards and Guidelines for Quality Assurance in the European Higher Education Area (encompassing internal and external quality assurance).
 - vii Maintain sufficient flexibility and responsiveness to meet changing demands and public priorities in a timely manner.
 - viii Complement and avoid duplication with, so far as possible, other assurance processes in higher education (for example Ofsted; professional, statutory and regulatory bodies).

Annex C

List of abbreviations

DEL	Department for Employment and Learning (in Northern Ireland)
FEC	Further education college
HE	Higher education
HEFCE	Higher Education Funding Council for England
HEI	Higher education institution
HEPISG	Higher Education Public Information Steering Group
HESA	Higher Education Statistics Agency
ILR	Individualised learner record
IQER	Integrated Quality and Enhancement Review
NUS	National Union of Students
PSRB	Professional, statutory and regulatory body
QAA	Quality Assurance Agency for Higher Education
SEDA	Staff and Educational Development Association
UUK	Universities UK