

Policy briefing

Quality assurance in England: Key principles



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An independent quality assurance system has been one of the hallmarks of UK higher education since 1997. Developed through the Quality Assurance Agency, the quality assurance system has been highly valued and has underpinned the international reputation for excellence of UK universities overseas. In recent years the student voice has been incorporated into quality assurance and the system has proved sufficiently flexible to provide a basis for continued collaboration throughout the UK.

Going forward, we believe that the quality assurance system in England must be independent of the regulatory functions of the Higher Education Funding Council for England and that the principles of independence and co-regulation should continue to apply. Accordingly we see no place for the transfer of quality assurance functions to governing bodies which exercise valuable but different governance responsibilities. However, there is scope to improve the current quality assurance system to ensure that institutions see it as an enabler, and not as an obstacle and a burden. In addition, the quality assurance framework must be risk-based and proportionate in order to avoid unnecessary bureaucracy and costs.

An independent and co-regulatory quality assurance system based on these principles and this approach will serve the UK and England well in the future and should be the benchmark for institutional excellence and high quality teaching.



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Introduction

1 Since 1997 the Quality Assurance Agency for Higher Education (QAA) has been the independent body responsible for monitoring and advising on standards and quality in UK higher education. It is independent of both the funding councils in each of the 4 UK nations and of higher education institutions. However, QAA is commissioned by the funding councils to provide quality assurance in higher education, and it works with institutions to develop guidance to support the sector to safeguard the reputation of UK higher education.

2 In October 2014, the Higher Education Council for England (HEFCE) announced that it would, in partnership with the Higher Education Funding Council for Wales (HEFCW) and the Department for Employment and Learning in Northern Ireland (DELNI) seek views on future approaches to quality assessment in UK higher education.

HEFCE, HEFCW and DELNI (hereafter referred to as HEFCE) established a steering group to lead and shape the debate on future approaches to quality assessment. HEFCE published a discussion document in January 2015 to seek views on quality assessment and then a full consultation document in June 2015 with proposals for future approaches.

3 The quality system in Scotland has a number of features that differentiate it from the system in England, Wales and Northern Ireland, although the QAA is also responsible for this (as QAA Scotland). For this reason, the Scottish Funding Council is not participating in this review, although it has confirmed that it continues to look at ways it can develop its Quality Enhancement Framework.

Key principles for the future quality assurance and assessment system

4 In January 2015, HEFCE published a discussion document¹ that provided new opportunities to review these developments but also to re-consider some key principles and future processes for quality assurance of universities and other higher education providers in England. In June 2015, HEFCE issued a further consultation with proposals for future approaches to quality assessment; this policy briefing focuses on those proposals. We believe that the future quality assurance system should be underpinned by three key principles.

million+ principles for quality assurance and assessment

- > Quality assurance of higher education in universities should be **independent** of the funders whether government, funding councils or students.
- > All parts of the sector should have equal responsibility in developing and implementing the system, including the relevant rules, regulations and benchmarks that form the basis of quality reviews to ensure that **co-regulation** is at the centre of quality assurance.
- > Quality assurance should be **risk-based, proportionate** and reflective of an institution's particular context.

In our view an effective, independent rigorous quality assurance process will:

- Safeguard the role of UK universities in the global market
- Provide a benchmark for excellence in the sector
- Feature a robust, coherent external examiners system
- Involve governing bodies effectively and appropriately
- Encourage excellence and innovation in teaching and learning
- Engage students in strong partnerships
- Protect the reputation of higher education

¹ http://www.hefce.ac.uk/media/hefce/content/What_we_do/Learning_and_teaching/Assuring_quality/QA_review/Discussion/QAR_Discussion.pdf

5 The quality assurance system has undergone review and development in recent years. Since 2009, QAA has developed and implemented a number of review methodologies, in consultation with government, providers, students and funders. On each occasion different stakeholders proposed some specific requirements and expectations that were then incorporated into the methodologies, sometimes as 'add-ons' to the initial design. For example, Higher Education Review (HER) was initially designed to a specification from HEFCE to be far more risk-based and proportionate than its predecessor, Institutional Review. However, a number of policy requirements and expectations emerging from consultation mitigated against this. These included the need to make legally defensible judgements about meeting expectations and led to significant evidence requirements and detailed reporting. The inclusion of a judgement on 'enhancement' expanded the focus of review beyond a 'risk' basis.

6 Other changes prompted by stakeholders have been widely regarded as enriching the review process. These include a greater direct involvement of students and a specific focus on the experience of postgraduate research students although these also added to its complexity. It is also noteworthy that some of the dimensions of proportionality and risk initially proposed by QAA for HER, were not supported by the sector and funding councils in consultations.

7 The Higher Education Funding Council for England (HEFCE) has identified a set of principles for the future quality assurance system of higher education, based on its analysis of sector responses to its discussion document published in January 2015. The principles are familiar, having been a core part of the sector's approach to quality assurance over many years, and remain useful for any revised approach. These principles, to some extent, suggest that the future system of quality assurance will share many common approaches to the current system.

8 However, some of the points listed by HEFCE serve more as examples of activities than overarching principles within the new system, and overall it is not clear that the new system will be as independent as the current system. In particular we are not convinced that the proposed principles place co-ownership at the centre of the quality assurance and assessment system. This is the case currently, with QAA owned by the sector and developing quality regulation in consultation with autonomous institutions.

9 million+ believes that three core principles must underpin the future quality assurance and assessment system. These are central and fundamental points which should influence all other elements of the system. In developing the new system, these principles should remain at the core, with any activity, policy, regulatory function dismissed if it does not adhere to these three principles.

Key principles for the future quality assurance and assessment system

continued

> The quality assurance system should be independent

10 There is strong support for an independent quality assurance process that ensures that HEFCE is not cast as the sole regulator of the higher education sector. Since it was established, the contribution of the Quality Assurance Agency has generally been seen as helpful and informative, though we welcome the QAA's proposals for improving their interactions with institutions. The higher education sector in the UK is based on a long-standing respect of the autonomy of institutions, which devise their own curriculum, set their own entry requirements and award their own degrees. This autonomy has been key to dynamism, quality and innovation associated with universities in the UK and stands in sharp contrast to some of the centralised and bureaucratic control of institutions which applies in some countries.

11 Following devolution, the UK Government is responsible for setting the broad framework for the higher education environment in England and, through HEFCE, for providing investment and ensuring cost-effectiveness, but the sector primarily acts independently and autonomously. This has included the process of quality assurance. Although the legal parameters established prior to devolution by the Further and Higher Education Act 1992 indicate that HEFCE is responsible for quality assurance, the precedent for the last 20 years has been for this to be managed independently via the Quality Assurance Agency.

Notwithstanding the creation of the separate funding councils which now operate in England, Scotland, Wales and North Ireland following devolution, the QAA system has continued to operate on similar lines and has provided for cross-border collaboration.

12 We see no reason for this principle of independent quality review to be abandoned. Since the fee reforms implemented in 2012, HEFCE may not fund universities for teaching directly in the same way and to the same extent as it once did, but this is not an adequate reason to take back responsibility for quality assurance from an independent, sector-owned organisation.

> The quality assurance system should be one of co-regulation

13 Any future system needs to replicate one of the core strengths of the current system – that of co-regulation. This is not simply about institutions playing a role alongside other organisations like HEFCE or the QAA. Rather, it is about all parts of the sector taking equal responsibility in developing and implementing the system, including the relevant rules, regulations and benchmarks that form the basis of quality reviews. This would mean institutions continuing to co-develop elements such as the Quality Code with the QAA and with HEFCE, and maintaining the role of external examiners to ensure that the system has peer review at its centre, akin to the way in which the assessment of research is rooted in peer review.

> The quality assurance system should be risk-based

14 The proposals put forward in HEFCE's consultation document emphasise the need to ensure that quality assurance and assessment is based on risk, rather than applying the same approach to all providers. As is made clear in the consultation document, a 'one-size fits all' system is no longer appropriate. We endorse this sentiment, and suggest that risk-based, proportionate quality assurance and assessment reflective of an institution's particular context is one of the more fundamental principles of the new system.

15 The higher education sector is comprised of a range of providers, with varying levels of experience and maturity. The recent influx of new providers in England has created a more complex environment. These new providers may be relatively inexperienced in quality assurance and are likely to require a greater degree of oversight and support than those that are more mature in order to ensure that the interests of students and the reputation of UK higher education are protected.

16 It is sensible that those that have been part of the sector for many years, and that are able to demonstrate long and strong track records of success, experience a quality assurance regime that is proportionate to their deep experience in higher education. Moving to a more risk-based quality assurance system, particularly one focused on an enhancement-driven relationship with institutions would be a positive step.

This would need reform to the way in which the Quality Assurance Agency engages with institutions and to some elements of the current system. For example, reforms to the Quality Code, including a significant reduction in the number of indicators and a stronger academic voice, would be necessary in any new system.

17 A system based on risk and proportionality is also one that can be more efficient. In addition, it opens up the possibility of more involvement from other organisations. For example, existing accreditation organisations and professional, statutory and regulatory bodies will have a great deal of expertise to offer in terms of the quality and relevance of some aspects of course content. Embedding these accreditation and scrutiny opportunities into the overall quality review process will prevent institutions having to duplicate audit activity.

Features of the future quality assurance system

• Safeguarding the role of UK universities in the global market

18 UK universities are highly regarded in terms of the quality of the education they offer – both to home and international students. The Quality Assurance Agency review process confirms the strength of institutions in this regard. The international reputation of UK universities has been considerably enhanced as a result of the independent quality assurance system that has been adopted and which has been provided through the Quality Assurance Agency.

19 This system has enhanced the capacity of UK universities to operate, trade and participate in transnational partnerships on a global basis, underpinned by independent assurance of their high quality. Diminishing the strengths of the system would create reputational risks and would have the potential to undermine the recruitment of international students as well as research partnerships. Successful quality assurance review should be considered the baseline for any higher education provider and should remain as one of the criteria for the award of university title.

• Successful quality review as a benchmark for excellence

20 In addition to the future arrangements for quality assurance of higher education providers in England being considered by HEFCE, the Department of Business, Innovation and Skills is considering how the UK government's proposal to introduce a Teaching Excellence Framework (TEF) for English universities linked with institutional 'permissions' to uplift fees, might operate. There are a number of questions of principle and practice associated with the introduction of the TEF but there is also the potential to link the operation of TEF with the quality assessment system. The pros and cons of the detail of any proposals in this regard will need to be carefully explored and considered.

21 However, the TEF also has the potential to undermine the domestic and international reputation for quality of English institutions which has, in part, been secured by an independent quality assurance system. The review process currently undertaken by the Quality Assurance Agency sets a powerful benchmark of quality and should be seen as setting the standard of excellence that all institutions offering higher education must meet. Even in a new system, with a reformed review process, success in independent scrutiny of the quality of education provided by higher education institutions should be seen as the starting point and the TEF is likely to be far more credible if it is underpinned by an effective, independent quality assessment system. It would be entirely counter-productive if the operation of the TEF undermined institutional autonomy and institutional reputation for quality, gained through an independent quality assurance system.

- **A robust, coherent external examiners system**

22 External examiners have a great deal of experience, acting as effective peer reviewers as part of the overall quality assurance system of higher education. However, strengthening the system may bring benefits to the sector. A more robust, coherent approach is likely to make it easier to understand by stakeholders outside of the higher education sector, and as such promote confidence in the system.

23 While accepting that there may well be ways to improve the external examiner system subject to further consultation and discussion, HEFCE's proposals for standardised, mandated training and a national register run the risk of becoming a regulatory function. If the external examiners system were to develop in this way, it is possible that it could begin to appear as very similar in make-up to a national inspectorate that operates in line with a centralised framework. This would be a marked departure from the long-standing tradition of institutional autonomy, would chip away at the respect for the academic integrity of universities and is likely to create additional and unnecessary bureaucracy.

- **An effective, appropriate role for governing bodies**

24 Fundamental to HEFCE's proposals are a greater reliance on institutions' own review and governance processes, on data already submitted, and on some strengthened external elements. The proposals imply a significantly reduced requirement for a cyclical review of baseline compliance conducted by an external agency. Furthermore, HEFCE's proposals would effectively transfer the role of the QAA to governing bodies. Significantly, more onus would be placed on governing bodies to provide assurance on quality, using data and other metrics as appropriate, with advice from external consultancies. For its part, HEFCE would engage with institutions as it does currently, using the 5-yearly review 'conversation' as a vehicle to consider issues of quality, but would expect far fewer interactions with institutions it deemed to be low-risk.

25 We believe that the proposals give governors excessive responsibilities. In general, governors are recruited for the insights that they bring from outside of the HE sector. They are unlikely to have the qualifications or capacity needed to express judgments about academic quality. This is not a criticism of governors in any way, but a recognition of where and how governors add value to the overall leadership of higher education institutions. Often selected for their expertise in business, finance, law and other areas, they offer benefits to institutions by bringing in knowledge and networks that would not otherwise exist.

Features of the future quality assurance system continued

26 As with other governing bodies in similar organisations, the role of governors should not be an operational one, but should instead remain at a strategic level. As such they also rely on internal and external advice – and one of the providers of external advice should be a national, independent quality assurance organisation. If this function was provided in a fragmented way, or via different consultancy organisations, governors in different institutions are likely to receive advice of differing quality. As a result, external scrutiny and the ability to share effective practice across the sector and institutions would also be reduced.

• Encouraging excellence and innovation

27 All students should benefit from high quality, excellent teaching from whichever higher education institution they opt to attend. It is also right that universities are incentivised to innovate and develop their courses and their curricula to ensure that students experience excellent higher education.

28 Developing measures to identify, promote, reward and share excellent, innovative teaching are to be welcomed. Universities are committed to supporting their staff to provide the best education to their students. In the latest National Student Survey, 86% of students stated that they were satisfied with the overall quality of their course. High satisfaction does not automatically indicate excellent teaching but it does suggest the government and the general public can be confident that universities are by and large meeting the needs of students.

29 An effective, appropriate quality assurance system should support the continuous improvement and enhancement of teaching within universities. It should be developmental, rather than judgmental, and should seek to promote innovative practice that enhances learning and teaching across the sector. Quality review conducted by an external organisation sets a powerful benchmark of quality and should be seen as setting the standard of excellence that all institutions offering higher education must meet. Excellence and innovation activity build on this benchmark.

30 One strength of a quality assurance system that is conducted by an independent organisation is that it would be able to identify and share this practice effectively with institutions in the course of its work (much as the QAA does currently). The quality enhancement system that applies to Scottish institutions and has been developed by QAA with these institutions and the Scottish Funding Council provides valuable lessons in how such an approach might work.

- **Strong student engagement and partnership**

31 Full student engagement is essential in improving teaching and learning in higher education. Significant progress has been made on this front through student representatives on committees, course representatives and student reviewers working with the Quality Assurance Agency. Students commit to this because they can see the benefit of working with institutions as co-developers of their learning experiences. As arguably the most important group of stakeholders in the higher education sector, they have a significant role in influencing the focus of quality reviews. They should continue to be a fundamental part of any future quality assurance and assessment process.

- **Protecting the reputation of the higher education sector**

32 The higher education reforms enacted since 2010 have led to a number of new providers entering the market, leading to a complex environment, and in some cases some damage to the reputation of the sector. Changes in and the expansion of the market have highlighted the different rules and regulations currently applied to oversight and scrutiny of different higher education providers.

33 We endorse the proposals in the consultation document to set a threshold for entry into the system for new higher education providers. This should be applied to all institutions seeking to offer designated courses and recruit students eligible for tuition fee and maintenance support from the Student Loan Company.

34 million+ believes that the baseline requirements for new providers should be necessarily high, and should be seen to define the minimum level of quality offered by a higher education institution in England. There should be an expectation that once it has entered the market and is benefiting from participation in the higher education system, an institution should continue to improve the quality of its provision, rather than simply maintain itself at the entry baseline.

35 Independent, external quality review and scrutiny of universities that is separate and distinct from the funding of higher education is a long-held tradition of the UK higher education system. It has lasted because it is effective, and does much to uphold the reputation, both at home and abroad, of the sector. While there is certainly scope for reform, particularly around ensuring proportionate, risk-based and appropriate review of institutions with strong track records, the credibility provided by external review is essential to ensuring the continued success of UK and in this case English universities.



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