

HEFCE Consultation: A risk-based approach to quality assurance

million+ Submission

million+ is a university think-tank which provides evidence and analysis on policy and funding regimes that impact on universities, students and the services that universities and other higher education institutions provide for business, the NHS, education and the not-for-profit sectors.

1a. Please comment on the extent to which you consider that the agreed quality assurance system and HEBRG principles, set out above, provide an appropriate basis for a more risk-based approach to quality assurance

1b. Are there any other principles that should apply?

We support the set of principles outlined by HEFCE. The retention of universal institutional review and existing quality assurance objectives together with adherence to the HEBRG principles provides an appropriate basis for a more risk-based approach to quality assurance. We particularly support the principles that seek to promote regulation that is co-ordinated, transparent and proportionate and which uphold QAA's status as an operationally independent body.

The consultation raises some wider issues around higher education regulation. Institutional risk could be perceived to fall into two areas: 'academic' standards which are monitored via QAA and due diligence issues around governance and finance which are monitored via the Interim Regulatory Partnership Group and HEFCE Financial Memorandum. Since these two facets of institutional risk are linked it is important that they are monitored and addressed simultaneously and there is a need for greater clarity about how this will work in practice.

2a. In the pursuit of a more risk-based approach to quality assurance, the consultation proposes that the extent, nature and frequency of external quality assurance should vary according to the track record and scope of the provision of the higher education provider. Do you agree?

2b. Please explain the reasons for your answer.

Agree.

In principle we agree that the nature, extent, and frequency of external quality assurance should vary according to the track record and scope of the provision of the higher education provider, providing that the international reputation of the sector is maintained.

3a. Do you consider that establishing within Institutional Review a core review process and additional modules for particular types of provision (for example on elements of collaborative provision) would help with achieving the risk-based approach to quality assurance?

3b. Please explain the reasons for your answer.

Agree

Activities such as collaborative provision create greater uncertainty and risk but it is essential that the criteria used to identify the need for additional modules are transparent. Under the previous institutional audit methodology, collaborative provision which was deemed to be large or complex attracted additional scrutiny but the criteria used to apply Collaborative Provision Audit were not published.

4a. Please indicate, for providers with a longer track record, on Route B, what should be the interval between external QAA institutional reviews, ranging from six to ten years.

4b. Please explain the reasons for your answer.

Six years.

Institutional review, whilst burdensome, provides the opportunity for internal reflection and the identification and dissemination of good practice. million+ believes it is right that providers who lack an established track record should be subject to more frequent QAA institutional review. However given the importance of both facets of the quality assurance regime, the commitment to institutional review within a set timeframe of six years should be maintained for all institutions.

Six years represents a significant period of time in the life of an institution. This timespan typically witnesses four graduating cohorts of students studying three-year degree programme and represents the tenure of a vice-chancellor and associated terms of office of senior managers; the duration of many institutional strategic plans and associated policy frameworks. It is also vital that the international reputation of UK HE – which is premised partly on regular QAA institutional review – is maintained. As such there is a clear rationale for maintaining the status quo of six year institutional reviews for all institutions.

5a. Please indicate, for providers with a shorter track record, on Route A, what should be the interval between external QAA institutional reviews. Bearing in mind the need for there to be a relationship between the review intervals of the two routes, do you have a view about the minimum or maximum interval between reviews on Route A?

5b. Please explain the reasons for your answer.

5c. Given the evolution of the quality assurance system, most further education colleges with higher education provision will be reviewed according to Route A initially. Should these providers have the option to undertake an early review during 2013-15 so that they may be able to transfer more quickly to Route B?

The current interval between reviews should remain.

Disagree. The consultation lacks a coherent explanation about why an early review system should be introduced for further education colleges. However given the extensive nature of review for TDAP and RDAP these should count towards the number of reviews needed to qualify for Route B.

6a. Should – and, if so, how might – the QAA seek to streamline or modify its external review activities for those providers which have a substantial proportion of their provision accredited by PSRBs?

6b. Please explain the reasons for your answer.

Agree

In principle we support the desire to streamline external review activities for providers which have a substantial proportion of their provision accredited by PSRBs as any reduction in the burden of review would be welcome. In practice it is difficult to see how this could be achieved given that most PSRBs focus on programmes, courses and subjects whilst QAA institutional review is concerned with institutional management of quality and standards. A track record of significant, cross-university PSRB links could however act as a factor justifying a shorter or less intense QAA review.

7a. What form of annual assessment of key quantitative and qualitative data could be undertaken to determine whether there are grounds for any out-of-cycle investigations, which may or may not lead to some kind of formal review?

7b. Are there any other data or information sources that the panel should consider?

million+ has a number of concerns about the proposed data panel and the annual review of data:

- **Data sources:** There are inherent problems in using data for purposes it is not designed for and some of the proposed sources present a cause for concern. The limitations of the National Student Survey are widely understood and we oppose the use of DLHE data: graduate destinations are not necessarily linked to quality and this would in effect constitute an extension of QAA's remit. Further clarity is also needed about the types of qualitative data that may be used and the sources from which qualitative data may be drawn.
- **Context:** It is also important to recognise that data requires context and interpretation and that data indicators represent just one aspect of quality management. Equally important is an institution's awareness of what indicators mean in terms of quality and standards and the timeliness and effectiveness of responses but this is not likely to be clear from an annual set of indicators. The monitoring panel will not have the fine-grained understanding of an institution that a review team develops
- **Panel membership:** The membership of the panel is not specified. Any panel must include sector representatives in order to capitalise on relevant expertise and knowledge, enhance sector confidence and ensure rigour.
- **Additionality:** The additional value of these proposals is unclear given that the QAA already operates the Causes for Concern procedure and HEFCE already monitors institutions in relation to financial risk and sustainability.

8. Do you have any other comments on this document or further suggestions for what we might do?

No