

# **Consultation on the future of quality assurance (HEFCE 2009/47)**

## **Summary of discussions at consultation events**

As part of the consultation process for future arrangements for quality assurance, the sponsoring bodies (HEFCE, DEL Northern Ireland, Universities UK and GuildHE) held two seminars in January 2010. The aim of the seminars was to enable delegates to make a fully informed response to the consultation. The events provided delegates with an opportunity to talk to the sponsors about the background to the consultation, explore their understanding of the consultation questions further, and discuss their opinions with other delegates.

Delegates discussed the consultation questions in breakout groups, which feedback indicated were the most useful part of the day, allowing detailed consideration of the issues around the questions.

The following note summarises the oral views and questions of nearly two hundred delegates. It should not be read as a definitive account of the sector's views. In particular, some of the suggestions made may have been made by only one or two delegates, while in many places it was hard to capture the strength of support for particular ideas. There was a great variety of views, as would be expected given the range of institutions and institutional roles represented as well as other bodies. The consultation will take these oral views into account, but will place particular weight on the written responses which are due to be submitted by 5 March 2010.

**Consultation question 1: Do you agree that the principles in paragraph 31 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 are the correct ones for the revised quality assurance system to meet?**

- a. There was broad agreement to the general principles and objectives, but delegates agreed that 'the devil was in the detail'. The Quality Assurance Agency's (QAA) consultation later in 2010 on the detail of the audit method would be crucial in pinning this down.
- b. Some delegates wondered whether the proposed changes, which represented alterations to the existing institutional audit method, were radical enough. Others thought that not enough was made of the view that quality in higher education (HE) was still good overall.
- c. Some suggestions for additional items to include specifically in the objectives and principles were:

- i. *Informing the public.* With regard to 'commanding public confidence' and 'providing publicly accessible information', delegates agreed in principle, but felt that more clarity was needed around what the term 'public facing' meant, who the 'public' actually were, and how they should be involved. All of the public, not just those with immediate interests such as parents and prospective students, had a right to know that money was being spent wisely, providing a private benefit but a public good. Value for money should be proven, especially in the current funding climate. With the high profile of the 'public facing' agenda, there could be an objective to inform the public about the quality assurance system and how it works, in order to manage expectations – particularly with regard to the change between school and HE. There was recognition of the increasing importance of clearly written and publicly accessible information, with the NSS increasing in importance as a driver for change.
- ii. *Quality enhancement.* A number of delegates considered that quality improvement (some preferred the term 'quality enhancement' as being more accurate) should be more strongly emphasised, although enhancement did not sit well with audit judgements, especially as focusing on getting a good audit outcome did not necessarily mean that key institutional challenges were addressed. The developmental engagement stage of integrated quality and enhancement review (IQER) was mentioned as a positive example.
- iii. *Institutional autonomy.* The key principle of institutional autonomy should be included prominently and its benefits better explained. The focus of a quality assurance system should be an institution's internal mechanisms, confirmed to be suitable by external judgement. It had to be recognised, however, that further education colleges (FECs), which were also included under the key principles and objectives, were not autonomous in the same way, and depended on awarding bodies.
- iv. *Independence.* The independence of the system also needed to be clarified. This might require changing structures and/or perceptions, and perhaps involving outside agencies. Some commented that principles e.iii and e.iv should be combined.
- v. *Collaborative partnerships.* The principles should explicitly mention the need to include the variety of collaborative partnerships within the quality assurance process, and taking different responsibilities into account. Some FEC colleagues felt that the HE system should link more specifically with Ofsted (the QAA already liaise with Ofsted and take their reports into account as part of a portfolio of evidence in IQER). 'Collaboration' might include work with employers as well as other institutions.
- vi. *Teaching and learning.* The importance of teaching and learning to quality assurance, including the activities of 'frontline' staff, should be specifically mentioned. There was some discussion of the extent to which academic staff needed to be involved with specific quality assurance procedures - some delegates felt that they should not, as it would be a distraction from their main

duties; others felt they should be more explicitly involved, particularly if a more developmental approach was adopted. However, the contribution of their teaching and student support work to the institution's overall quality assurance processes, whether implicitly (through good teaching and adherence to university procedures) or explicitly (for example, through specific reference to the Academic Infrastructure) should be recognised.

- vii. *Student experience.* Students were at the heart of the system and should be more explicitly mentioned as a high priority. The challenges of creating a high-quality student experience for an increasingly diverse student body, listening to their views, and maintaining student confidence, should be brought out. Students needed to be more involved not only in the quality assurance system but in programme development. What exactly does 'meeting the needs of students' mean, and who assesses what these needs are?
- viii. *Evaluation.* Evaluating the success of the new system (for example, in six years' time) could be built into the objectives.
- ix. *Employers.* Meeting employer needs could be mentioned. Getting an employer response to the consultation was important.
- x. *Efficiency/Financial climate.* There were general questions about how the current financial climate might impact both on institutional quality assurance systems and on the development of an external system. Any system needed to be demonstrably efficient; there were strong concerns about diverting funds from frontline teaching.
- xi. *Avoiding burden/Proportionality.* It would be important that the system did not grow too much – if anything was added to it then the sponsors would need to look carefully at what to take away. Proportionality could be a principle. Not all of the aims had to be met through audit or review; other aspects of the system, (for example, the Academic Infrastructure or National Student Survey), could meet them.
- xii. *Responsiveness.* The ability of the system to respond to problems should be included in the principles.
- xiii. *Establishing/maintaining minimum standards* should be an explicit principle.

**Consultation question 3: Do you agree that the broad characteristics set out in paragraph 38 are the right ones to consider when revising the institutional audit method?**

- a. As with the overall principles, there was general agreement with the characteristics, but wide discussion over detail, particularly of the specifications against which institutions would be judged.

- b. Some felt the characteristics did not express clearly enough the purpose of audit, which ought to be ensuring that institutions provide a high-quality experience for students. It should also be clear that a 'threshold judgement' was being reached.
- c. There was some doubt over the suggestion in principle (b) that the public were the principal audience – it was suggested that the principal audience was higher education institutions (HEIs). Institutional quality assurance practitioners found the reports useful in their current form, and felt that they could even be made more technical. These useful aspects should not be lost to please a different audience. They agreed that the technical language meant that they could not use them to involve academic staff in quality assurance discussions, but they saw it as their role to 'interpret' the reports for colleagues. One suggestion was to provide a 'plain English' overall report with a technical annex for quality assurance practitioners.
- d. Some delegates felt that aiming for 'no increased overall level of demand' (principle e) was unrealistic. Others argued that audit was only one form of regulation - HEFCE audits, HESA data and accreditation by professional, statutory and regulatory bodies (PSRB)s were other examples – and therefore HEIs could not be viewed as under-regulated. It was important to be clear that reducing burden did not necessarily mean reducing scrutiny, particularly if the emphasis was on auditing information that the institutions already produced. However there should be recognition that the sector were being asked to 'do more with less' in the current financial climate.
- e. There were comments that audit had become a 'staged event' and there was scope for a more developmental approach (linking to discussions about quality enhancement under question 1) that could potentially involve more departmental staff. There was acknowledgement, however, that an imminent audit was a lever to make things happen in institutions. The development phase of IQER and its focus on improvement was mentioned as an example of good practice.
- f. Some suggested that in becoming more flexible, a new system should tailor amount of scrutiny to risk, while acknowledging that clearer metrics of what determined risk would need to be developed. An audit should be looking at an HEI's own risk-management processes. Some felt that quality assurance audit should link more closely to HEFCE finance and governance audits.
- g. Suggestions for additional principles included 'accessibility' (for example, of handbooks, overall language used), a focus on quality enhancement, which some were concerned could be lost, and consideration of international as well as national comparability.
- h. There was a question over whether the principles and objectives of independent, external judgements should be reiterated in the principles of audit (that is, a specific acknowledgement of the importance of peer review).

**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?**

- a. Delegates were interested in the idea of thematic approaches being used to 'spotlight' particular themes and provide the ability to respond to current issues – although thematic approaches were not the solution to fixing all the perceived problems.
- b. Several groups discussed whether the proposed flexible themes would contribute to the overall audit judgement. As themes might differ between institutions, some delegates considered that making judgements on them could result in an institution being disadvantaged, and that they would not be comparable. Some suggested that judgements should be made only on the 'core' of the audit, and themes used to look broadly at the sector as a whole and/or used for development and enhancement – in this case audit could be seen as a form of external consultancy. Reporting on the themes could be done compositely without HEIs being identified. Some even felt that the thematic enquiries should be entirely separate from audit.
- c. Others argued that comparability between audits was not necessarily sacrosanct, particularly in an increasingly diverse sector, and that institutions needed to be less sensitive on this issue – six years was a long time to wait for a new development. The public might not be interested in cross-institutional comparisons (interest in cross-subject comparisons was more likely). A lack of comparability could be helpful in avoiding the 'ranking mentality'. Some considered that real comparability of audit judgements between different, individual auditors was difficult in any case.
- d. Some commented that as investigating a theme could add burden and cost, something would need to be dropped to keep the core manageable. It would also be important to ensure that the thematic scrutiny was proportionate, especially for smaller institutions or 'niche' institutions where a particular theme might result in a disproportionate focus upon them. The greater flexibility could be a benefit if it allowed for better proportionality. The audit team would probably need to vary in size according to the size and complexity of the institution.
- e. There needed to be clarity on how themes would be identified and by whom. The QAA and sponsoring bodies would need to be proactive in identifying themes and communicating them to the sector in advance. Responding to moral panic in the media should be resisted!
- f. Once again, the QAA's operational description would need to be very clear on how this would work. It would be helpful to look at how similar approaches worked in Scotland and in FECs.

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

- a. The issue of how to provide better information specifically on 'standards' was widely discussed. Some commented that the problem of distinguishing between 'quality' and 'standards' had still not been addressed properly in the consultation document, and should be clearly explained in any guidance.
- b. Delegates generally agreed that the QAA should consider this issue but did not reach a conclusion as to how. As institutions were so diverse – in programme content, approach to teaching, contact hours, facilities– it was felt that, beyond a threshold level, standards could not be compared. To make sensible comparisons, which would be across disciplines rather than HEIs, would require a national curriculum or 'tick-box approach', neither of which were considered desirable. It might be useful for the QAA to propose alternatives.
- c. Institutional responsibility should not be forgotten. It was up to autonomous institutions to interpret standards – otherwise there was a risk that standards could be seen as prescribed. However it could be that the real problem was not standards themselves, but a lack of public understanding about how standards were set and maintained in HE – and about what the system could and could not do. This needed to be clearly explained. At the same time the existence of high-threshold standards which were met by every programme in the UK, and the role of the Academic Infrastructure as the overarching structure for promoting this, needed to be better publicised. The fact that there was a wide variety of provision above the threshold level reflected the diversity of the sector and should be celebrated.
- d. It was also important not to forget the student 'journey' and the widely differing starting points and aims of different students and programmes. These also made comparable end points difficult.
- e. If standards were looked at in more detail, audit was not the correct tool to attempt this; a whole range of other things were important to gauging comparability. Professional bodies had rigorous threshold standards. Published information was an important tool with which the public could make their own comparisons, but any public presentation had to take the needs of its audience (students, employers, public) into account. More detail might be needed about how the quality of programmes was assured.
- f. The external examiner system was also intended to promote comparability of standards, but was only partially adequate, as it was not a truly national system. There was scope for better strengthening and control of the system. The role of the external examiner should be better explained to the public.
- g. Benchmarking of subjects could appear too generic, but too much detail could again result in prescribed 'curricula' or hold back innovation. Delegates

questioned why subject benchmarks were used at degree level but not at masters' level.

- h. There needed to be clarity on what was being compared. To a certain extent the current audit judgement was about confidence in institutional processes – that was a separate issue from a judgement on standards.
- i. A sector-wide agreement was needed on 'condonement' and 'compensation' – the flexibility that institutions had to moderate students' marks up or down to take circumstances into account.
- j. Some commented that the Academic Infrastructure functioned well if applied intelligently, but did not have a high enough standing in some institutions.

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

- a. There was a strong view that the existing terms were poorly understood and needed to be changed, but no consensus on a suitable alternative.
- b. The term 'limited confidence' was particularly disliked as it was often perceived as meaning failure rather than as a 'pass'. However it was a strong lever for change within an institution.
- c. Some delegates felt that the lack of grading above 'confidence' – which means there is no way to distinguish between 'good' and 'excellent' – was a disadvantage in that institutions could not use an excellent score in their publicity (this was compared with FEC Ofsted scores which include an 'outstanding'), nor could they benchmark themselves against each other. However it was agreed that the diversity of institutions and the difficulty of comparing standards above a threshold made differentiated judgements a challenge.
- d. There was a need for some differentiation between judgements. If every institution received the same score of 'confidence' or its equivalent, this might have a negative impact on public confidence in the system. The popular criticism that 'nobody ever fails institutional audit' itself lowered public confidence. However, the more different judgements there were, the more risk there was that the media could create 'league tables' with audit results.
- e. There was some discussion about the length of time that a judgement remained current; an institution that received 'limited confidence' under the current method could have addressed the problems within a year, but the original judgement remained on the QAA web-site albeit with an update note. There was scope for a more dynamic system, especially since greater flexibility was proposed.
- f. Some groups suggested that judgements should be set within a wider narrative context that explained how they had been arrived at. One suggestion was that

the judgement should simply be 'pass' or 'fail' with contextual qualifiers. A standard phraseology for expressing judgements would be helpful. There also needed to be an explanation that the judgements were about processes for assuring standards rather than the standards themselves.

- g. The QAA and sponsors again needed to be clear about the 'audience' for the judgements – who needed to know and how much detail would they want? Ultimately the overall judgements probably needed to be the most accessible aspect, as they were what most people were interested in, but would a judgement really change a student's mind about where to apply?

**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 audits should make a judgement about the reliance that can reasonably be placed on the accuracy and completeness of this information?**

- a. In general, most delegates agreed that published information should become the subject of a judgement – many saw it as inevitable. This was however conditional on clarification over the data set which in turn would be informed by the TQI/NSS review. The 'audience' for the dataset was once again a key issue, with potential students identified as the main audience.
- b. The QAA operational description would have to be clear on exactly how the data would be used in, and inform, institutional audit. There needed to be clarification over whether it was the data itself that was being audited, or the institution's processes for checking that it was accurate. Accuracy and completeness were not the same thing as usefulness!
- c. Burden was a concern; if something was being added to audit, then something else should be taken away. It would be helpful if there was a section of the code of practice on providing public information. Some questioned whether an audit every six years on average would provide Government with enough confidence on accuracy.
- d. Some delegates queried whether, given the complexity of the data set, and the fact that much of it would be at programme level, it was appropriate to include this in institutional audit as it would mean a lot of extra work for an audit team. There was a suggestion that this could be done as a desk-based exercise, perhaps by QAA officers or even by HEFCE. Information that was already subject to scrutiny, (for example, HESA returns, should not be included).
- e. Students' comments were important. Students already had a chance to comment on information in the student written submission. Some also suggested that the

NSS should ask students if the information provided to them met their needs and was accurate.

- f. There were concerns that raising the status of the information set could leave institutions open to litigation if information was found to be inaccurate. However, others agreed that institutions could not use the complexity of the process to provide information as an excuse for not getting it right. Some felt that datasets were unlikely to be comparable – as data would be presented in different ways – and information about differing contact and study hours would need to be explained. However, institutions had the opportunity to explain their own dataset. Others were concerned that league tables might be formed from the judgements.

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

- a. Several groups advised that the sponsors had to be clear about who the 'audience' would be for such a summary, and for the audit report itself, as output should be tailored to the audience. 'Non-specialists' were a very wide group, considered to include academic staff as well as the general public. Some delegates were doubtful that a plain English summary was needed for a general audience as a whole-institution report was of limited interest. Others felt it would be worthwhile to assure the public that the HE system was in good shape, but agreed it was a difficult task.
- b. Potential students were only likely to be interested in headline judgements – if at all. It was suggested that, if students were found to be a potential audience, then student auditors could write the summaries. Delegates acknowledged that students are an increasingly diverse group.
- c. Employers might be interested, but again might want a summary directed at their perspective.
- d. There was agreement that the process did need to be better publicised and explained – 'everyone has heard of Ofsted, no-one has heard of QAA'.
- e. Writing a simple version of an audit report was easier said than done. In particular, care should be taken in expressing judgements; it might be misleading to simplify these without providing any contextual explanations.

### **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?**

- a. There was broad agreement that the audit method would benefit from the increased flexibility of a rolling plan, and from a constantly up-to-date process, as long as this did not mean 'knee-jerk' reactions to media stories or political

interference. There was hope that this would also mean more flexibility in the method to take a more proportionate approach to different types of institutions. The interests of students should remain a priority.

- b. Concerns included:
- the risk that auditors and institutions might not keep up with revisions to the process creating major training and resource requirements
  - making changes too frequently (some suggested that phases for change should be planned)
  - the amount of notice given of a change
  - 'moving goalposts', meaning institutions did not receive comparable judgements
- c. Sponsors advised that an example of a 'minor' change could be a change in choice of theme. A 'major change that had occurred in the current cycle, requiring consultation, was the introduction of student auditors. Delegates commented that notice was required even of a minor change. In deciding between 'minor' and 'substantive' issues, some were concerned that the impact on judgements should be considered; anything affecting a judgement was 'substantive', as this could affect comparability. As with earlier discussions over audit, others argued that comparability should become less of an issue, as an audit should focus on a particular institution, and not the sector as a whole.
- d. The new group set up to have oversight of the HE quality assurance system would have a crucial role to play here. It needed to be very robust to resist overly reactive changes and making changes too frequently. However it should be able to advise if fundamental changes needed to be made. Some felt that if the group members were carefully chosen it should be left up to them to decide whether a particular issue was substantive or not, and so whether it would require consultation with the sector.
- e. The comment was also made that a more flexible and dynamic system would require the QAA to engage more in a regular dialogue with institutions, which was a benefit.

**Consultation question 10: This document 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.**

The following general points were raised amongst the groups (in no particular order):

- a. The Unistats web-site doesn't get used enough. Work may need to go into making it more accessible, changing the format, and/or advertising the site more intensively.

- b. Quality assurance should be about improving things for the student, but some felt that this priority did not jump out of the document. The document needs to bring out the roles of student auditors and representatives.
- c. Students take more notice of league tables and rankings than of audit reports.
- d. Audit reports were never going to be a marketing tool. A good report had no overall effect, but bad ones could be devastating and could lead to a fall in recruitment.
- e. The sponsors could have been more radical in some areas. The NSS, for example, had met with initial resistance but was now perceived as a very useful tool.
- f. The document should make more reference to using evidence from PSRBs. Academics tended to take PSRB accreditation more seriously than audits.
- g. Those responsible for making changes in quality assurance should not get swept up in the 'moral panic' – the need for change should be challenged. Sponsors should avoid trying to tackle problems that don't exist.
- h. How about making comparisons with other quality assurance mechanisms, nationally and internationally? The system still looks too insular.
- i. It might be useful to look at wider aspects of the quality assurance system – the consultation is very focussed on audit and the Academic Infrastructure.