

Sector impact assessment

Name of Policy/Initiative	Addressing unsatisfactory teaching quality in HEFCE-funded institutions
1. What are the aims of this policy/initiative?	To determine the ways in which HEFCE could address problems of chronic unsatisfactory teaching quality, and to communicate this clearly to the higher education (HE) sector.
2. At what stage of the development process is this SIA being undertaken?	Following informal consultation with other key stakeholders – Universities UK, GuildHE, the Quality Assurance Agency (QAA), the Association of Colleges (AoC) and, the Learning and Skills Council (LSC) – and discussion at the HEFCE Board in April 2008, the draft policy was published for consultation in August 2008. Responses were sought by the end of 2008. A lack of staff resource has since prevented taking the policy forward; however, we have now evaluated the consultation responses and the current version incorporates those responses as far as is possible and appropriate. The policy is now ready to publish.
3. Do existing data sources enable us to provide evidence of impact? If not, how should we best gather evidence?	<p>There has been extensive research, most lately that commissioned by the Quality Assurance Framework Review Group, to determine the impact of the routine QAA review processes on higher education institutions (HEIs) (less evidence is available in the case of further education colleges (FECs)). (See HEFCE publications 2005/35, 2006/45 and 2008/21.) However this policy represents an additional process, carried out only when the existing QAA audit and/or review processes have already taken place, and the institution has failed to address issues of unsatisfactory quality under the normal, existing processes.</p> <p>The policy states that any action taken – and therefore its impact - will depend on the individual circumstances of an institution, so exact impact is difficult to define. However, any institution which undergoes this process is likely to be considered ‘at higher risk’, and so will be subject to higher-intensity scrutiny than usual as well as support through our Institutional Engagement and Support Strategy. However, the policy is very much a ‘last resort’ when all other attempts to address the problem have failed. To date, no institution has been in the position in which this policy could have been invoked. Given this fact, taken together with our (and QAA’s) experience in recent years, and our assumptions of how the management of academic quality might evolve, we assume that the probability of invoking this policy is quite low.</p> <p>For HEIs, the policy will feed into our assessment of institutional risk. For FECs, HEFCE will work with the LSC or relevant successor body to determine the most appropriate action.</p>
Regulatory impact assessment	
4. Will this policy/initiative/project require HEIs to pay for or carry out additional work in the context of what a well-managed HEI would already be expected to have in place, both now and when the policy has been implemented?	Yes. The institution will be expected to put measures in place to address the unsatisfactory quality. The QAA and HEFCE may offer support to the institution in the preparation of its action plan. There will certainly be significant burden on staff time, particularly for senior management, and possibly additional financial burden depending on the action required. However, all we will be asking the institution to do in principle

	<p>is to put in place academic quality arrangements that should have already been in existence. In that sense, the institution should already be incurring the relevant costs, although we accept that the cost of putting right past weaknesses might temporarily incur additional costs. There may similarly be additional management and governance costs arising from our use of the Institutional Engagement and Support Strategy.</p> <p>If we decide to withhold some HEFCE funding, whether temporarily or permanently, this will incur a financial cost for the institution.</p>
<p>5. If so, do the benefits of doing this to the delivery of HEFCE strategy, the HE sector, the HEI itself and others outweigh what we have asked HEIs to do? If yes please describe the benefits.</p>	<p>Yes. The purpose of this policy is to deal with cases of chronic unsatisfactory teaching quality, where all existing processes have failed to address the problem. If we do not ask an institution in this position to improve its quality, then we jeopardise HEFCE's strategic aim of ensuring that all HE students benefit from a high quality learning experience. We would also face accusations of failing in our statutory duty to ensure that provision is made to assess the quality of all the HE we fund; this policy is an extension of that duty in that it proposes more detailed assessment of failing areas and ways to remedy them. Poor quality also damages the reputation of the sector as a whole, not just the institution concerned. Our obligations at this level and to students override any we might have to an individual institution.</p>
<p>6. How have you arrived at this judgement? Please refer to the results of consultation and other supporting evidence.</p>	<p>We anticipate that we will only implement the policy rarely. However, as it is vital to the reputation of English HE and HEFCE's own strategic aims to maintain the quality of teaching, it is essential that HEFCE takes appropriate steps to assist the institution in recovering from the unsatisfactory teaching quality assessment.</p> <p>Key stakeholders have agreed to this policy and, following sector-wide consultation, the vast majority of respondents (34 out of 35) thought the policy was a suitable approach. There was also strong agreement with the policy's emphasis on protecting students in failing institutions. The policy will help to address current Government concerns over how poor quality in the HE sector should be addressed.</p>
Equality and diversity	
<p>7. Which individuals or groups are likely to be affected by this policy?</p>	<p>University staff, particularly at a senior level, will be affected by the work required. Student officers may be affected and potentially the rest of the student body, if the reason for the unsatisfactory quality is institution-wide. However no particular groups should be affected more than any others. HEFCE may withdraw funding from an institution as a last resort, but this will be teaching funding. The policy also makes it clear that if a student attracting any type of support funding (for example, for disabled students) should transfer to another institution, that funding would also be transferred.</p>

<p>8. What is the likely impact on these groups (is it positive, negative or neutral)? How have you arrived at this judgement?</p>	<p>We anticipate that the effect will be neutral as it targets the institution as a whole, rather than any particular group. Any staff or students may potentially be affected by the policy or the actions taken to address it (such actions may include bringing in a team to support the institution in taking action, or transferring students away from a poorly performing course). However it should not affect one group more than another.</p> <p>If we see that our action affects or may affect any particular group, we will consider the impact on that group as appropriate. If, for example, an institution were not allowed to bid for special funding until it addressed the problem, then the policy could affect groups that might have particularly benefited from that funding, (although of course the bid itself may not have been successful). Similarly, if provision were moved to another institution, the policy could force students to travel more.</p> <p>However the benefits to students of implementing this policy (better quality provision) should outweigh any negative impact. As a further guard against adverse effects of this sort, the policy reminds all parties to be mindful of students' needs.</p>
<p>9. If negative, what actions have been taken to mitigate the effect?</p>	<p>If this policy is used then action will need to be taken on a case-by-case basis. Identifying particular groups that may be affected should form part of the discussions around identifying this action. In extreme cases of unsatisfactory quality, students may have to move to another provider, and the policy states that any existing support arrangements (for example, for disabled students) should be maintained in this case.</p>
<p>10. Can this policy be used to ensure and promote both equality and diversity? If so, how?</p>	<p>If the policy is triggered then HEFCE will work with the institution to develop an action plan, and will endeavour to ensure that any action taken by either the institution or HEFCE does not adversely affect any particular group.</p>

Sustainable development	
11. What is the likely impact of this policy/ initiative/project on sustainable development? Is it positive, negative or neutral? How have you arrived at this judgement?	Positive. If poor quality teaching is allowed to continue, there may ultimately be negative financial repercussions for the institution (HEFCE may withdraw funding, students may not enrol there), which this policy should help to avoid. We assume that institutions with good quality are more likely to achieve positive social and economic outcomes, and long-term financial sustainability, than those institutions with poor quality.
12. If negative, what actions have been taken to mitigate the impact?	No negative impacts have been identified.
13. How can this policy/initiative/project be used to create opportunities to support sustainable development? Please indicate how you have exploited these opportunities or why you have been unable to do so.	Action plans will require the institution to ensure that similar problems are avoided in the future, which should help to ensure the economic stability of the institution.

Certification by Director

This is a fair assessment of the impact of this policy/initiative/project on the HE sector, taking into account the regulatory burden imposed. The policy/initiative/project has been appropriately designed to meet our equality obligations and promote equality and diversity and sustainable development. This assessment is ready for publication.

Signed

Date

Summary

The policy sets out to identify and communicate the ways in which HEFCE could address problems of chronic unsatisfactory quality in teaching.

Regulatory impact: If the policy is triggered, the institution will be considered at higher risk, and institutions will be expected to undertake additional work to bring their teaching quality to a satisfactory level. This is likely to be a significant burden on staff time at a senior level. However we would expect staff to ensure satisfactory quality in teaching in any case and, given our statutory duty to assure the quality of teaching, the burden is justifiable.

Equality and diversity: No particular groups should be affected more than any others by this policy, but the policy makes clear that the need to protect students' interests is paramount. If students are affected by the policy –if, for example, funding for their course is withdrawn – then HEFCE must ensure that not only can they continue their studies elsewhere, but also that any student support funding is maintained.

Sustainable development: The policy should help to contribute positively to the financial sustainability of the institution by enabling it to restore good quality and continue delivering HE.