ENQA Review

Follow-up Report

Introduction

The Quality Assurance Agency for Higher Education (QAA) underwent its second review by ENQA in May 2013, resulting in continued full membership for the agency. The review report was received by QAA in July 2013 and provided a focus for further improvement and enhancement of the agency's functions and processes. Work began immediately on the development of an action plan to respond to the recommendations contained in the report. The action plan was approved by the QAA Board in December 2013.

The ENQA review report has permeated all levels of QAA, and has provided a welcome opportunity to reflect on our work and to involve the Board and members of staff across the agency in the development and implementation of the action plan. To that end, the Follow-up Report has responded, not only to the recommendations in the report, but also, at the request of the QAA Board of Directors, to a comment made by the Panel in relation to ESG 2.4 (processes fit for purpose).

QAA will continue to use the ENQA review report and the resulting action plan as a reference point throughout developments in the forthcoming academic year and beyond.

Response to recommendations and comments

> **ESG 2.2 (development of external quality assurance processes)**
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> **Panel recommendation:** the 'risk-based' analysis should be developed further, (as already planned by QAA), bearing in mind the need to ensure conceptual clarity and procedural fitness for coherent implementation.

England and Northern Ireland

QAA's risk-based approach to quality assurance applies in the main to Higher Education Review, which is the review method for publicly-funded universities and further education colleges in England and Northern Ireland.

The risk-based element of this method is manifest in two main ways: in the interval between reviews and in the intensity (as measured by the duration) of review visits. In essence, providers with a strong track record in managing quality and standards are reviewed less frequently and less intensively than providers without such a strong record.

The criteria for determining whether a provider has a strong track record are set out explicitly in the Higher Education Review Handbook,[1] which was subject to full consultation with the sector and published in June 2013. The interval between reviews is six years for providers who have had two or more successful reviews by QAA and whose last review was successful. Providers who have not had two or more successful reviews by QAA and/or whose last review by QAA was unsuccessful are reviewed four years after their last engagement with QAA.

Once the interval between reviews has been established, the intensity of the review visit is determined by a team of peer reviewers based on a desk-based analysis of a wide range of information about the provider under review. Some of this information, including a

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[1] *Higher Education Review Handbook*, available at: www.qaa.ac.uk/publications/information-and-guidance/publication/?PubID=2963.

self-evaluation document, is given by the provider; some is given by students; and the rest is assembled by QAA.

The programme for, and duration of, the review visit varies according to the outcome of this desk-based analysis. Where this analysis demonstrates a strong track record in managing quality and standards, and that the provider is continuing to manage its responsibilities effectively, the review visit can be relatively short since there should be few issues about which the team would require further information. However, where the analysis does not demonstrate a strong track record, and/or indicates that the provider is not managing its responsibilities effectively, the review visit will be longer so as to allow the team to investigate its concerns thoroughly. Again, there are explicit criteria to guide review teams in making good and consistent decisions about the duration of review visits in the Higher Education Review Handbook (see Part 3), and the decision-making process is a key part of the three-day training event, which is mandatory for all new reviewers.

QAA has conducted approximately 130 Higher Education Reviews to date and all of the actors involved in those reviews, including the providers, are invited to give feedback on their experiences. The implementation of the risk-based elements of the method has not been a theme of providers' or reviewers' feedback, which suggests QAA has succeeded in making those elements clear conceptually and implemented consistently. It is worth noting that QAA, in its published response[2] to a current sector-wide consultation on the future of quality assurance in the UK, has set out radical proposals for reform of external quality assurance so that it is contextualised to the quality capacity of providers and is refocused on the academic experiences of students, and aligns with the government's proposed Teaching Excellence Framework.

Wales

In Wales QAA operates a risk-based approach to quality assurance that differs from England and Northern Ireland. In this approach risk is assessed on the provider's track record as indicated by the outcome of the previous review. This means that where an institution has a review that does not indicate any significant weaknesses the interval between reviews remains at six years. In cases where the outcome of the review indicates significant weaknesses the interval between reviews is either four years or two years. The criteria for determining the interval between reviews is set out in Annex 3 of the Higher Education Review (Wales) Handbook.[3]

Scotland

In Scotland the review method is Enhancement-led Institutional Review. This enhancement-led approach cannot strictly be described as being primarily risk-based, but it is, however, responsive to the strategic context of the institution, including the trends in the student population and the consequences of those for the quality arrangements that are in place. All institutions are reviewed on the same cycle at the same interval but the themes pursued and the nature of follow-up will depend on a number of factors, including the complexity of the institution's provision and the extent to which it demonstrates effective self-evaluative practices.

Institutional review in Scotland is part of the wider Quality Enhancement Framework, which aims to improve or enhance the quality of the student learning experience. While enhancement embraces assurance, the focus is on the continuing drive to enhance

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[2] *QAA Response to Quality Assessment Review: Second Phase Consultation*, available at: www.qaa.ac.uk/publications/information-and-guidance/publication/?PubID=2971
[3] *Higher Education Review (Wales) Handbook*, available at: www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=13.

and on future development. The focus on enhancement has enabled the method to move beyond threshold assurance, to promote the development of excellence and enhance the student learning experience. Scotland remains committed to an enhancement-led approach to quality, to a partnership-based approach, to active student participation, and to collaborative and collegiate practices.

Collaborative PhD studentship on risk-based quality assurance

Contributing to analysis of risk-based quality assurance, QAA is partially funding a PhD student from King's College, University of London, to undertake research on risk-based quality assurance in education. The research will include an analysis of the history of quality assurance in the UK and a mathematical modelling of risk in relation to QAA review outcomes. This PhD studentship is nearing the completion of the second year of a three-year programme. The PhD student is a member of the QAA Research Advisory Group and his findings are shared with the Directorate and senior leaders. Jointly authored papers will be submitted to the Society for Research into Higher Education and the European Quality Assurance Forum conferences in 2015.

ESG 2.4 (processes fit for purpose)

Board of Directors request: QAA is invited to describe and provide evidence on how the guideline: 'ensuring that the review procedures used are sufficient to provide adequate evidence to support the findings and conclusions reached' is met.

NOTE: this is not a recommendation from the ENQA report. The report states: 'The Panel was told and accepts that QAA bases its processes on the "fitness for purpose" principle.' It is included in this Follow-up Report to provide additional information about the adequacy of QAA's review evidence base.

England, Northern Ireland and Wales

Higher Education Review and Higher Education Review (Alternative Providers) - QAA's principal review methods for approximately 700 universities, colleges and private providers - are fundamentally evidence-based review methods whose judgements flow explicitly from information about the provision under review.

The emphasis on evidence commences from the very start of the review process, in the detailed guidance given to providers and their students about the range and type of information they are expected to provide to review teams (see Annex 3 of the Higher Education Review handbook). The review method then provides review teams with two opportunities to request and receive further evidence about the provider before the review visit commences. The review visit provides more opportunities to gather written evidence, as well as to document evidence from meetings with students, staff and other stakeholders.

Ensuring that the findings of Higher Education Review are grounded in sufficient evidence is a key part both of training for reviewers and of the role of the QAA Review Manager who manages the review process. Reviewers must cite evidence in support of any judgement, recommendation, example of good practice or other evaluative statement, and these citations are included in the draft report sent to the provider so that the provider may understand precisely what evidence the outcomes derive from. To aid this process QAA uses standard schema for the citation of evidence; reviewers use numerical references linked to a full list of evidence included at the end of the draft report.

Scotland

The Enhancement-led Institutional Review method is an evidence-based method combining the scrutiny of documentation; institutional visits, including meetings with students and staff; published reports; follow-on reports and events, together with thematic analyses of outcomes to maximise learning and the enhancement of policy and practice. External and our own evaluation of the overall enhancement-led approach has found that our work has had considerable impact on practice in the sector, with the 'reach' of QAA activity extending over time into wider groups of students and from senior and middle managers to practitioners.

Higher Education Review: First Year Findings 2013-14

A key part of the role of QAA is to review how providers of higher education maintain their academic standards and ensure the quality of the learning experience offered to students, and to report on the findings of review. Reporting on review findings more broadly provides evidence for the contextualisation of future reviews, and for the focus of enhancement work with the sector.

QAA has produced a report summarising the findings from reviews carried out in accordance with Higher Education Review in 2013-14.[4]

In 2013-14, 47 higher education providers were reviewed under the Higher Education Review method. These comprised two universities and 45 further education colleges. The reports published as a result of these reviews provide a rich understanding of today's diverse and differentiated higher education sector.

ESG 2.7 (periodic reviews)

Panel comment: For all institutions, the balance of risk would need to be carefully calibrated against the comprehensive expectations contained in the Quality Code. The transition to the Quality Code will be completed in 2013-14 and the QAA website redeveloped, to aid institutions and the public in understanding the Quality Code's role and relevance.

The UK Quality Code for Higher Education (Quality Code) was completed in October 2013, and full alignment achieved between the Expectations in the Quality Code and in Higher Education Review in the following August. Expectations were set out in Annex 2 of the Higher Education Review Handbook demonstrating how they aligned with the judgements on academic standards, quality of learning opportunities and information.

Following completion of the Quality Code, QAA has focused on making the Quality Code as accessible to reviewers, providers and other stakeholders as possible. Our approach emphasises the co-regulatory aspect of the Quality Code (the 19 mandatory Expectations, developed through extensive consultation with the sector and other stakeholders) and the resource aspect, which helps providers to reflect on and enhance their quality management arrangements.

Developing the accessibility of the Quality Code has involved two main approaches. First, making the Quality Code directly accessible through a web-based application called 'Build Your Own Quality Code', through which users can extract content from the Quality

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[4] *Higher Education Review: First Year Findings 2013-14*, available at:
www.qaa.ac.uk/publications/information-and-guidance/publication/?PubID=2882.

Code by theme, or extract, for example, just the Expectations, as well as being able to download individual chapters. This application reflects an overall redesign of the Quality Code web pages, improving access to the Quality Code and related materials. Both are complemented by a new booklet giving an overview of the Quality Code and setting out the 19 Expectations. *The Quality Code: A Brief Guide* provides a less technical explanation of the Quality Code, 6,000 copies of which have been made available since its launch.[5]

Second, QAA has developed, and continues to develop, toolkits designed to promote understanding of the Quality Code. For example, one focused on colleges that do not have degree awarding powers[6] and a 'Your Questions' service[7] making available answers to technical questions received by QAA between 2013 and 2015. A toolkit relating to MOOCs is under development supported by QAA's MOOCs network, which brings together those with an interest in a range of aspects of the quality assurance of MOOCs to share their knowledge and debate key issues.

QAA continues to support providers through the sharing of practice. Its Quality Enhancement Network brings together staff from subscribing institutions to present case studies and share practice in an informal workshop setting, drawing on the Quality Code where appropriate. Recent examples have covered student engagement in the monitoring of programmes, international collaborative provision, placement learning, and universities and colleges working together to secure standards.

In autumn 2015 QAA is launching a Quality Code Enhancement Project, through which QAA will work with providers and other stakeholders to identify and share examples of the ways in which the Quality Code is informing higher education providers' practice in managing academic standards and the quality of their provision. This will provide a rich source of information on how the Quality Code is being used as a resource to support providers in developing and enhancing effective long term quality management.

The embedding of the Quality Code in providers' practice, and in review methodology, means risk can be looked at through the lens of the Expectations and how providers undertake their own quality assurance against them. The full set of Expectations continues to underpin the review approach, regardless of the scope of the actual review process.

ESG 3.6 (independence)

Panel recommendation: care should be taken to safeguard the element of current HEFCE funding and to protect the operational independence of QAA in any changes following the implementation of revisions of HEI funding model in England, whereby funding for teaching will in future reach institutions wholly via student fees (rather than a combination of tuition fees and grant via HEFCE).

QAA has secured contracts with HEFCE for each year since the ENQA review and a contract is in place up until 31 July 2016. The Quality Assessment Review being undertaken by the funding councils of England, Wales and Northern Ireland has challenged the security of continued funding from these sources, with the possibility that the quality assessment contract could be put out to competitive tender, or that external quality assessment could be

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[5] *The Quality Code: A Brief Guide*, available at: www.qaa.ac.uk/publications/information-and-guidance/publication/?PubID=180.
[6] *College Higher Education Toolkit: Engaging with the UK Quality Code for Higher Education*, available at: www.qaa.ac.uk/publications/information-and-guidance/publication/?PubID=2945.
[7] *The Quality Code for Higher Education: Your Questions 2013-15*, available at: www.qaa.ac.uk/publications/information-and-guidance/publication/?PubID=2943.

done away with altogether. To help position the organisation for ongoing sustainability in the face of these challenges, QAA has:

- worked on developing a strong position to bid for the contract, should a tender process occur
- commenced work on diversifying its funding sources to decrease reliance on the funding councils' contracts
- actively engaged with the review process to promote an outcome that does not jeopardise the UK's alignment with the ESG.

The future of the regulatory and quality assurance environments is under further consideration by government in the light of the shift to student fees, a planned reorganisation of some higher education sector bodies funded directly by government, and the introduction of a new Teaching Excellence Framework for England. QAA will promote approaches that underpin the Agency's operational independence in this changing policy context.