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# Learning and Teaching Committee

Subject: QAA consultation on a proposed new process for reviewing quality and standards in higher education in England and Northern Ireland

Origin: Rob Pearson, Programme Quality and Teaching Partnerships

1. **Introduction**

The QAA has asked institutions to comment on a draft operational description of a new ‘institutional level’ review of HEIs. To be called Institutional Review, it replaces Institutional Audit and will become active in 2011. The operational description sets out in detail how the new review method will work and the proposed changes to the existing method. It is available online at: <http://www.qaa.ac.uk/news/consultation/reviewconsultation.asp>

Learning & Teaching Committee is asked to note a summary of main changes to the review method and to comment on a draft response to the consultation. The consultation closes on **26 November 2010**.

1. **Summary of the main features of the Institutional review method**

The main features of the proposed arrangements for Institutional review are summarised below. The most significant changes have been highlighted in bold and are discussed in further detail.

Features:

1. Each institution will be reviewed approximately once every six years.
2. Reviews will have two components: a core section leading to judgments, and a thematic element which will not lead to a judgment.
3. There will be an enhanced focus on the engagement of the institution with the Academic Infrastructure and other agreed independent reference points.
4. **There will be four judgments:**
5. A judgment on an institution's 'threshold' academic standards.
6. A judgment on the quality of 'learning opportunities' an institution makes available to students.
7. A judgment on the way an institution seeks to develop and 'enhance' students' learning opportunities.
8. A judgment on the quality of 'public information' an institution publishes, including information for students and applicants.
9. **The judgements will comment on actual outcomes, rather than the management of the outcomes.**
10. **The review team will meet or receive information from a larger number of students, including recent graduates, and may also call on external examiners.**
11. Recommendations will not be graded.
12. Affirmations of action in progress will be included.
13. **There will be no briefing visit by the review team.**
14. There will be no specifically-defined, predetermined review trails as currently included in Institutional audit.
15. A self-evaluation document (SED) will be required.
16. More use will be made of videoconferencing and teleconferencing for meetings.
17. All documentation will be submitted electronically and team members will work with electronic documents.
18. **The role of the institutional contact will be enhanced.**
19. The review team will include a student member.
20. Reports will be shorter; there will be a summary written specifically for public readership.
21. **A published action plan will be prepared as a result of all reviews, whatever the judgment; institutions will be expected to involve the student body in preparing the action plan**
22. A judgment indicating that an area of the review fails to reach the required standard will lead to a follow-up process which may lead to a revised judgment
23. Detailed evidence for findings will not be published by QAA but the institution will receive an evidence base to allow a follow-up plan to be constructed and quality of provision to be enhanced.

**.iv Four judgments**

The four areas are already subject either to a judgment or a formal commentary in Institutional audit, so are already central to review activities. It is proposed that reviews carried out during the first year of the revised process (that is, in 2011-12) will include a commentary on public information in the report, together with recommendations where appropriate, but no judgment. From 2012-13 there will be a judgment on the published information which will take into account the outcomes of the consultation currently being run by the Higher Education Public Information Steering Group (HEPISG).

**.x The review team will meet or receive information from a larger number of students, including recent graduates, and may also call on external examiners.**

The process is being designed so that student views form a greater proportion of the evidence base than at present. The review panel will also include a student member. Recent graduates and external examiners are not currently involved in Institutional audit.

**.xiii No briefing visit**

Instead of the briefing visit (a 3 day visit to the institution approximately 5 weeks before the audit visit), a one-day meeting of the review team will take place away from the institution. The Institutional Facilitator will be invited to attend, providing for early engagement with the Review team.

**.xviii Role of the institutional contact**

Institutions will be invited to nominate an Institutional facilitator to liaise between the review team and the institution and to provide the team with advice and guidance on institutional structures, policies, priorities and procedures. This development is intended to improve communications between the institution and the team during the review week and enable institutions to gain a better understanding of the team's lines of inquiry during the review.

The Institutional facilitator will contribute to the first team meeting (see above) which will take place away from the institution.

At the review visit the facilitator will not be present for any of the review team's private meetings, all of which include discussions about the team's emerging findings and/or judgments. However, the facilitator will have the opportunity for regular meetings which will provide opportunities for both the team and the institution to seek further clarification outside of the formal meetings.

**xxi. Published action plan**

Approximately 10 weeks after the report has been published institutions will be expected to provide an action plan addressing the recommendations and affirmations, and giving plans to capitalise on the identified good practice. Institutions will be expected to update the action plan annually and publish it on their website.

1. **Consultation Questions**

LTC is asked to comment on the draft responses given below.

**Consultation question 1**

**(a) Do you agree that the changes noted take account of the requirements of the sponsoring bodies and the QAS principles?**

Yes. We welcome the removal of the Briefing Visit and the enhanced role of the Institutional Facilitator.

**(b) Will the changes help to strengthen management of quality and standards in institutions?**

The focus on the four judgement areas may serve to focus the attention of institutions on these areas. Whether this would also serve to strengthen the management of quality and standards within institutions is debatable.

**(c) Will the changes provide clearer information about quality and standards to a variety of stakeholders?**

The focus on actual outcomes rather than the management of those outcomes may provide stakeholders with increased assurance about quality and standards. However, it is debatable whether the Institutional Review reports, even in a revised format, will act as a primary source of information for most stakeholders. Discussion of threshold standards, for example, remains an area of confusion for most stakeholders who will be more concerned with absolute standards.

**Consultation question 2**

1. **Do you agree that further consideration of the way in which collaborative provision and overseas provision is reviewed is required?**

Yes, at present there is considerable duplication of effort in the preparation for and execution of collaborative audit and Institutional review.

**(b) Do you have any suggestions for improving the current processes?**

Separate reviews of collaborative / overseas provision should be dropped in favour of integrating a review of this provision within the Institutional review process. Where collaborative provision is large, the thematic element of Institutional review should be dropped, with that proportion of the review dedicated to collaborative provision instead.

**Consultation question 3**

**We want to express judgments in a useful, informative and credible way.**

1. **Does either Annex 2a or 2b do this, and is one more helpful than the other to particular groups of stakeholders?**

The judgments in Annex 2a are useful and informative. The judgments in 2b are not welcome as they could easily be converted to ‘scores’ for league tables.

**(b) Can you suggest alternatives for the words used to express grades of judgment?**

1. **If you feel that neither of the given formats is informative or credible, do you have suggestions for other formats?**
2. **What will be the challenges for institutions and audit teams in the use of the judgment formats given as examples?**

The review teams and institutions may find more room for disagreement if the judgements are more finely graded as in 2b. This will be a more subjective, and so more challengeable, judgement to make.

**(e) Do you have any suggestions for further guidance on which to base judgments?**

**Consultation question 4**

**It is intended that all documentation provided for the review team (see Annex 5) will be uploaded to a secure QAA electronic folder. Do you see any particular challenges for institutions in providing documentation in this form, or for review teams in using the documentation?**

The provision of documentation in electronic form is welcomed. It should be accompanied with guidance that institutions should not reproduce the documentation in hard copy for the review visit.

**Consultation question 5**

1. **Do you agree that agreed reference points for review should be increased to include more than the Academic Infrastructure?**

Yes. However, it should be acknowledged that some of the reference points are not mandatory in nature.

1. **Is agreement through the substantive/minor changes process (see paragraphs 73-81) appropriate?**

Yes.

1. **Do you see any problems with using the additional reference points currently being suggested (see Annex 3b)?**

No.

**Consultation question 6**

1. **Do you agree that it would be useful to enhance the role of the institutional contact as described in paragraphs 35-37?**

Yes.

**(b) Are there other tasks or responsibilities which the Institutional facilitator should carry out?**

1. **Do you agree that the role of 'lead student representative' as described in paragraph 38 should be included in the review process?**

The role is welcomed as it helps to reinforce the centrality of students to the review process. However, the timing of the review in the academic year should be given careful consideration to ensure continuity of the role holder.

**Consultation question 7**

**(a) What do you see as the challenges for institutions of online briefing?**

Online briefing forums are valuable but should not replace face-to-face briefings in which queries, which are often institution-specific, can be quickly resolved.

**(b) Is it feasible to expect institutions to start preparing their SED after only an online briefing and remote contact with the coordinating QAA officer?**

No. Institutions may want to start preparing or planning their SED well in advance of the audit, and should not be constrained by the timing of the online briefing.

The online briefing will presumably contain material of a mainly generic nature, in which case it should be made permanently available.

**Consultation question 8**

1. **Do you agree that there should be provision for review judgments to be changed after the follow-up process?**

Yes.

1. **Should the visitors be peers or can QAA officers carry out this follow-up visit and give a new judgment?**

The QAA officers do not make judgments in Institutional review, so it is questionable whether they should assume the same level of responsibility outside of the review visit. It would be more appropriate for the original Review Team to review their own judgments.

**Consultation question 9**

**(a) What do you see as the main challenges for institutions of the way in which the process for thematic elements will operate?**

The thematic element may be on an issue that is attracting public concern at a particular time. A report which comments on this area may unfairly single out institutions for criticism because they happen to be scheduled for audit during that particular period.

**(b) Can you suggest more effective ways for the process to operate?**

The benefit of thematic review is to provide a snap-shot of how institutions are addressing a particular issue at a specific period of time. It would be more valuable if the thematic elements from any one year were collated into a single sector-wide report. This report should identify the institutions reviewed as part of the ‘theme’, but in the spirit of the current QAA ‘outcomes’ reports should not name individual institutions in the body of the report.

A natural consequence of the above would be not to comment on the thematic element of the review in the main Institutional Review report.

If an institution has significant collaborative provision, the thematic element should be replaced by a collaborative review. This would negate the need for a separate review of collaborative provision.

**Consultation question 10**

**(a) What do you see as the main challenges for institutions of the way in which the process for introducing the changes to the review process will operate?**

The subjective nature of changes may cause disagreement between the QAA and the sector. i.e. one person’s minor change may be another’s substantive change.

**(b) Can you suggest more effective ways for the process to operate?**

**Consultation question 11**

**QAA is currently reviewing its complaints and appeals procedures.**

**(a) Are there any comments that you would like to offer about the way that these procedures currently operate?**

**(b) Appeals are currently allowed against judgments of no confidence only; should the scope of the appeals scheme be broadened?**

The scope of the appeals scheme should be broadened if the grading of judgements is introduced.

**Consultation question 12**

**What do you see as the particular challenges to institutions in working to the proposed review timeline?**

The main challenges will lie with the student representatives in terms of ensuring a continuity of oversight of the process. This will be particularly problematic if the review schedule straddles academic sessions.

**Consultation question 13**

**Are there any other comments you wish to offer about any part of the proposed method?**

* + 1. Institutional review is intended to be a periodic process in which each institution takes part approximately once every six years. However, there are two proposals which create an additional annual / rolling burden upon institutions. The proposals for an annual QAA desk based audit of published information and an annual institutional action plan significantly alter the review process from an occasional to a continual engagement with institutions. This is not to be welcomed, not least because of the additional resource burden it would impose on institutions.
    2. The value of changing the terminology of the judgments from a commentary on management of outcomes to a commentary on the actual outcomes is questionable (page 6 refers). It may raise expectations from stakeholders that the review is performing a function that it is clearly not. The change is semantic, not actual, with the review process clearly still looking at the management of outcomes within institutions.
    3. It is proposed to allow Review teams to call for meetings with participants not currently involved in Institutional Audit, such as external examiners and recent graduates. We would query the value of this:
* External examiners already fulfil a central role on the quality assurance of institutions and this would be an additional burden which may not be welcomed by externals. The rationale for their involvement is unclear: for example, is the intention to question the validity and reliability of their report? Are they intended to act as advocates or critiques of the institution? There would also be an additional expense incurred in making external examiners available.
* The pool of recent graduates will be limited by the fact that most will be in full-time employment and not be living in the local area. This will inevitably incur additional expense.