

## **CHANGES TO THE INSTITUTIONAL REVIEW: WALES (HEFCW CIRCULAR - W13/13HE)**

### **A response from Higher Education Wales (HEW)**

#### **1. Introduction**

In May 2013, the Higher Education Funding Council for Wales (HEFCW) published Circular W13/13HE 'Changes to the Institutional Review: Wales'. The consultation provides the principles for the review process as one that:

- has a strong focus on partnership and how this enhances the student experience;
- is robust and drives Welsh institutions to be internationally excellent;
- is flexible, and can be adapted to the changing higher education context;
- takes on those aspects of other UK review processes which meet the needs of Wales, but at the same time has a uniquely Welsh identity and reflects the Welsh context.

HEW recognises the statutory responsibility of HEFCW to assure the quality of teaching and the key importance of providing assurance to students. Our response to this consultation reflects our concern to ensure the highest standards of appropriate external quality assurance that meets the needs of all involved, in a necessarily resource efficient way.

#### **2. Principles**

**Q1 Is there anything else which should feed into the principles?**

##### **Response**

We broadly endorse the principles outlined in the consultation and would also highlight the importance of the following principles and objectives:

- Any revisions to the process need to be transparent and clearly articulated to universities
- Revisions should build upon the existing revised method for institutional review
- It is crucial that any revisions are appropriate for both a UK and international context.

#### **3. Students**

**Q2 Do you agree that the production of an annual student statement by student unions should be an expectation? If so, are there any unintended consequences of this?**

### **Response**

HEW is not clear whether it is appropriate for HEFCW to set out 'expectations' of students' unions (SU). We would consider it sensible for unions to produce an annual statement, but as they are separately constituted from universities, they are not obliged to. We support the proposal that the annual student statement should be produced but not be *submitted* to the QAA on an annual basis and agree that this would be a useful record of activity in that particular year which would allow the SU to build a more robust, evidenced based statement at the appropriate time. We believe that this proposal should build on the continuing dialogue between universities and their SUs and care should be taken not to disrupt or replace the current discussions and partnership focus.

This proposal also raises questions of staff capacity in individual students' unions and, in particular, it should be acknowledged that those who are in the early stages of post-merger integration may require more support.

**Q3 Should the proposed changes to recruitment of student reviewers proposed in HER be adopted in Wales?**

**Q4 Are there any other ways in which the role of students in review could be strengthened further?**

### **Response**

HEW welcomes the proposed student involvement in the process though it is difficult to see how this would be undertaken from a practical perspective. We would caution against having more involvement from students 'for the sake of it', however, and believe that greater involvement should be meaningful and valuable for all concerned, with consideration that in some SUs, there may be too great a demand on resources for this to be achievable. If annual statements become expectations in Wales, this in itself will strengthen the role of students in Wales and a further commitment to partnership working in the future, will, by its very nature, strengthen the student voice in the IR process.

## **4. Enhancement**

**Q5 Are there any unintended consequences of including an additional comment on the institution's engagement with the Future Directions quality enhancement themes?**

**Q6 Are there any unintended consequences of including identification of ways in which the student learning experience could be improved within the SED?**

### **Response**

There is a raft of activity in institutions, particularly on the current 'Future Directions' theme, and this would be an opportunity to highlight the work. It is acknowledged that staff may not be aware of the link between enhancement and Future Directions as, for example, there are

projects on 'students as partners' in curriculum design, but staff may not be aware that 'Students as Partners' is one of the current themes in Future Directions. It seems sensible, therefore, to include an additional comment on an institution's engagement with Future Directions enhancement themes if we are really committed to embedding this enhancement theme approach in Wales. Measuring this engagement however, may prove difficult and would require careful thought if introduced.

It is important that specifically tying in enhancement with Future Directions does not displace any enhancement work that is on-going at universities that may be outside of this programme or over and above what is required.

If introduced, this approach to enhancement would be quite different to that taken in England and we believe that it would be vital for reviewers to be trained specifically on this aspect of the IR in Wales.

## 5. Internationalisation

**Q7 Do you agree the proposal to ask the QAA to collect data on transnational education arrangements from individual institutions' collaborative registers on an annual basis? If not, please suggest an alternative way of collecting information on TNE partnerships.**

### Response

This question caused much discussion at the Learning and Teaching Advisory (L&TAG) group and centred particularly on whether or not it was the role of the QAA to collect data and whether this would, by default, change the remit of the QAA into almost an annual audit office. Questions over the expertise and resource at the QAA to deal with this sort of data collection and analysis role was also discussed. Feedback from the group was that this proposal was not welcome and members were unanimously opposed to this proposal. The value of providing a snapshot of TNE was questioned due to the multiple intakes at varying times of the year that differs across the sector. If HEFCW was approaching this from a minimising risk standpoint, it was suggested institutions could provide an annual statement to HEFCW in the form of a report or template. This would provide an alternative to the proposal.

**Q8 Are there any unintended consequences of requiring a comment on the institution's approach to internationalisation?**

### Response

The benefits of including a statement of this nature, are not clear. HEW is concerned with the meaning and interpretation of the term 'world class' not least in how it relates to the institutional review. It might be more appropriate to include an evaluation of where an institution considers itself to have areas that are 'world class' in the self-evaluation

document. This would require review teams to be put together in a way that they could confidently evaluate this area. Consideration should be given to international comparability rather than world class and how this ties in with the Welsh Government's suggestion in the HE Statement that attention should be given to a basket of measures in terms of benchmarking.

**Q9 Are there any unintended consequences of including an international reviewer on the review team?**

**Q10 Should the international reviewer be an additional reviewer or replace one of the current team members?**

### **Response**

HEW considers that an international member of a review team could provide a different perspective in certain circumstances, but we are unclear as to the benefits or value. As this is only being piloted in England from 2014, and the early feedback from Scotland is unconvincing, it may be prudent to wait for a further evaluation of the benefits before introducing in Wales.

Should the decision be made to include an international reviewer, we believe it should be in addition to, rather than instead of, a current team member. We believe that replacing a member of the current review team would impact on the balance especially in situations where a Welsh language reviewer was required. There is also concern around the practical nature of recruiting international reviewers and the cost implications associated with this.

Questions were raised at L&TAG over the reciprocal nature of these proposals and it was seen as important to allow reviewers from Wales the opportunity to gain experience overseas in order to share best practice with colleagues in Wales.

## **6. Four Year Review**

**Q11 Are there any unintended consequences of moving to a four year cycle?**

### **Response**

HEW strongly believes that moving to a 4 year review interval would establish a substantive difference with the Higher Education Review (HER) in England and Northern Ireland and is categorically opposed to this proposal. It is difficult to see how an unintended consequence of this would not be one of reputation that would, by default, cause damage to the sector in Wales. Moving to a 4 year cycle would give rise to a perception to those outside Wales that provision here is less robust or more risky, as under the HER, a 4 year interval would be used for newer providers and those who had previously had less favourable review outcomes. This is something that HEW is fundamentally opposed to. There is also no clear rationale behind this proposal to move to 4 years. Previous discussions with the Funding Council around proposals in England to move to a 10 year cycle, were that it would be

appropriate for Wales to move to 6 years if England moved to 10, so it is difficult to see the reasoning behind the suggested 4 year cycle.

There is also concern that a shorter review cycle would pose a greater burden on institutions. A suggested balance may be to retain a lighter touch mid cycle review that would provide HEFCW would the assurances it seeks plus allow students the opportunity to interact at the mid cycle stage.

## 7. Review

**Q12 Should the self-evaluation document take on any aspects of the reflective analysis? If so, which ones?**

### Response

It is not clear what the rationale is behind this proposal as it appears to be no different from the reflective reviews that are required in the current IRW.

HEFCW cites Scotland as an exemplar here but colleagues in Scotland are not convinced as to the value.

## 8. Thematic Element

**Q13 Should an institution-specific theme(s) be part of the review process?**

### Response

Having a specific theme would provide an opportunity to respond to emerging concerns but there is a apprehension that it would have the potential to distort or unduly influence the review if an institution was not able to identify the theme that the QAA should explore.

From a practical perspective, would the theme be weighted to ensure that institution A for example, is not advantaged/disadvantaged because of the particular theme that may not play to their particular strength? Is there a danger that particular themes would be looked upon more favourably than others? There needs to be recognition that not all themes will be relevant to every university given the diversity of the sector.

Currently, the expectations are set out in the Quality Code and this proposal would move us beyond the code so it is unclear how Wales would therefore be judged and measured.

## 9. Partnership

**Q 14 Should there be an increased focus on partnership in the review process?**

### Response

HEW is assuming that the term 'partnership' is being used here in terms of students and universities but what would be useful in this context is if 'partnership' could be defined? For example, what constitutes 'partnership' – a student giving feedback to their course tutor in a student-staff liaison meeting, or a student working as an equal on a curriculum development project?

There is much to shout about in terms of partnership working throughout the sector but it is not clear what else this proposal may involve and therefore, if it is actually a quality and standards issues for the QAA. HEW would need to be clear on the intended outcomes of this proposal to judge whether or not this is meaningful or just a tick box exercise. For example, would this proposal include cross sector partnership working or would it have to focus purely on an individual institution?

## 10. Follow-up Action

**Q15 Are there any unintended consequences of the QAA's annual visit to institutions including greater student engagement?**

**Q 16 How could the outcomes of reviews best be fed into the Future Directions biennial conference, and on-going Future Directions work?**

### Response

More meaningful student engagement would very much be supported but HEW believes that it should be through the students' union as the recognised voice of students at a particular institution. If there is a feeling that the union needs to engage more with their students, then consideration should be given to how both the SU and institution are supported to put those processes in place. It is also important that the expectations around the annual visit is understood by all concerned.

In terms of question 16, we believe that would require careful consideration, as each institution's review outcomes will differ. An overview report of the outcomes of reviews related to Future Directions could be reported in a document highlighting engagement with the theme(s). Presented as a concise 'best practice' document, it could highlight engagement, and identify areas for improvement across the sector. The Future Directions conference and events are very much focused on quality enhancement, rather than assurance, and altering this focus could change the nature of the Future Directions programme. There is a huge question however, as to whether this would be the role of the QAA, HEFCW or the HEA. As the coordinating body for the Future Directions themes, HEW

believes that the HEA should consider review outcomes from each institution and to identify areas to enhance the Future Directions programme. This should be done in liaison with the QAA and institutions.

## 11. Teaching

**Q18 Are there any unintended consequences of requiring a comment on the institution's engagement with the UKPSF?**

### Response

HEW believes that requiring a comment on the UKPSF along with a broader definition to include other professional teaching qualifications, would help raise the profile of teaching at Welsh universities and give Wales an extra edge. All universities are keen to engage and this proposal would demonstrate the sector's commitment to professional development. We would, however, caution against citing specific targets without further discussion and consultation with the sector.

## 12. Judgements

**Q18 If a judgement of 'requires improvement to meet UK expectations' is agreed for threshold academic standards in England and Northern Ireland, are you in agreement for this judgement to be available for Wales?**

### Response

Being part of a UK-wide quality assurance system is beneficial to universities in Wales and having a system that is comparable across the UK reinforces Wales' position internationally. With this in mind, HEW agrees that the judgements should be comparable and any changes in England should be mirrored in Wales.

**Q19 If a separate judgement is introduced for collaborative provision in England and Northern Ireland, are you content for this change to be introduced for Wales?**

### Response

As stated above, being part of a UK-wide quality assurance system is beneficial to universities in Wales. We understand that the proposal for a separate judgement in England has been scrapped so we would not want a separate judgement in Wales.

### 13. Collaborative Provision

**Q 20 Do you agree that hybrid and separate collaborative provision reviews should be replaced with a single review method of varying intensity, depending on the size and complexity of collaborative provision?**

**Response**

Yes, HEW believes that a single review method that varies in intensity, would be a positive development.

**Q21 If proposals for demarcating areas reviewed at a degree awarding body and those reviewed at a partner, delivery or support organisation are adopted in HER, are you in agreement for them to be adopted for Wales?**

**Response**

HEW believes that this approach would reduce the possibility of duplication and agree that if this is adopted in the HER, it should also be adopted in Wales.

#### **Change of Name**

**Q22 Should the name of the review process be changed? If so, do you have any suggestions?**

**Response**

HEW believes that there are advantages in changing the name of the review process in Wales to '*Higher Education Review Wales*', as this would reflect the geographic specificity but retain the UK-wide branding which is essential for the reputation of our universities.

### 14. Subscriptions of Directly Funded FEIs

**Q23 Are there any unintended consequences of requiring further education institutions with directly funded higher education provision to subscribe to the QAA?**

**Response**

This proposal seems entirely appropriate.