

Quality Assessment Review: Response from Universities Wales

Universities Wales represents the interests of universities in Wales and is a National Council of Universities UK (UUK). Universities Wales's governing council consists of the vice-chancellors of all the universities in Wales and the Director of the Open University in Wales.

Universities Wales welcomes the opportunity to respond to the Quality Assessment Review Steering Group's discussion document on the future of quality assessment (QA) especially at a time when the regulatory environment across the UK, and most recently in Wales, has diverged. This is an ideal opportunity to pause and consider future requirements of a quality assurance system for the UK and explore the scope for development and modernisation which would allow the system to adapt to changing contexts.

List of consultation questions

Question 1: Do you agree with our proposed principles to underpin the future approach to quality assessment in established providers?

The principles, as set out, are generally sound but are not adequately or consistently backed up by the detailed proposals for their implementation. We believe that this is partly because the argument for radical change, as opposed to rationalisation and enhancement of the current system, has still not been effectively made. Consequently, there are significant question marks as to whether the proposals, as currently outlined, would deliver a consistent approach to quality assessment across all HE providers, particularly on a UK-wide basis or meet the requirements of the European Standards and Guidelines for Quality Assurance. There is also a question mark over whether the proposals would reduce overall levels of costs and bureaucracy associated with the institutional delivery of QA and the external assessment of this.

Universities Wales considers that the definitions require further exploration and should recognise areas such as non-traditional modes of study and online/distance provision, and the nuances associated with these learning routes. For example, the need to avoid duplication between quality assessors is important.

We reiterate the comments made in the response to the initial consultation about taking the needs of Wales into account, particularly the impact of the HE (Wales) Act that includes a definition of quality and the potential for any provider to apply for automatic designation. At a recent workshop run by the Higher Education Funding Council for Wales (HEFCW), there was discussion around a draft set of additional principles that we feel should be incorporated:

- Institutions are responsible for the quality and standards of their awards;
- Any QA system must have students and their engagement at the centre;
- There should be a UK single system but an England/Wales or Scotland/Wales/Northern Ireland system should not be dismissed;
- There should ideally be a single provider, with consistency across the HE system but scope to tailor review processes at country level;

- Any risk based approach should be linked to outcomes;
- The process should minimise the bureaucratic impact on providers;
- The work of Professional, Statutory and Regulatory bodies should supplement and inform the system;
- The system should include all provision in UK and overseas;
- It should cover full-time, part-time, postgraduate taught and postgraduate research processes;
- The processes adopted should be cost effective, particularly in terms of provision transnational education (TNE) provision;
- It should focus on quality of learning and teaching and the academic aspects of the student experience;
- It should cover both QA and quality enhancement;
- It should be informed by the external examiner system in terms of the assessment of standards;
- It should be informed by other priorities, for example the work of Prevent; UK Visas and Immigration (UKVI), where those impinge on the quality of learning and teaching and standards.

Universities Wales believes that a system fundamentally based on peer review allows providers the assurance that reviews are conducted and judgements made by a team with the expertise and in-depth understanding of the sector, and that this adds value and allows for the dissemination of good practice that will benefit the institution and the student experience. Universities Wales endorses the continuation of co-regulation and its support of institutional autonomy. The addition of student membership on the Board is something that Universities Wales pushed for and was agreed by the QAA Board mid-cycle and the discussion document's risk-based approach may present particular challenges with regard to student engagement. In the current process, students' unions are able to plan how to actively engage with the review process but this may become more difficult in a risk-based system when considering the turnover of sabbatical officers within a students' union.

It is appreciated that further detailed design and development work is anticipated as the next step in the process. However, as currently set-out, the potential risks of the proposals include:

- Reputational damage to the UK HE brand internationally
- Lack of external verification of institutional quality
- Erosion of student engagement
- Fragmentation of UK wide system
- Loss of sharing of good practice – limited mention of quality enhancement
- Jeopardising Trans National Education (TNE) partnerships
- Risk of CMA objections (Removal of External Quality Assessment for some of the higher education sector, if it were to be retained for Alternative Providers and new entrants, is inconsistent with CMA expectations about a level playing field for all providers, and its entire removal presents a significant consumer risk)
- Removal of academic peer review
- Risk to co-regulation

Question 2: Do you agree that our current proposals for the use of meaningful external scrutiny as set out in paragraphs 32-34 are sufficient? If you do not agree, please indicate what additional or different external scrutiny you propose and provide the reasons for this.

It is difficult to see how the proposals as set out for use of meaningful external scrutiny are more coherent or comprehensive than those already operated by many HE providers through their existing QA systems. Indeed it appears that there is less coherence in the proposals and therefore unclear how the aim (para 33b) of reducing bureaucracy and regulatory cost could be achieved.

Universities Wales does not believe that a QA system should restrict innovation or flexibility by moving to a system where comparability is defined by a strict and standardised set of rules that would impinge on academic autonomy. There is a need to consider how academic standards, including skills and competencies, could be better measured in disciplines such as health. A measure such as learning distance travelled, or value added could be considered in the future. Professional, Statutory and Regulatory Bodies (PSRB) reassure stakeholders and assess competences rather than general skill sets and there could be an argument for a future QA system in assessing the areas outside those investigated by the PSRBs. There is no appetite in Wales to return to a subject review system.

When considering meaningful external scrutiny, a view should be taken of the current external examining system. The performance of external examiners is seen as varied and a future system could consider the development of a body of credible, trained external examiners that could allow the QA system to assess the student experience more holistically. Such an extension could mean that the feedback given to a university would allow it to address issues more effectively and efficiently. It is still unclear however, how an enhanced external examiner system would work in practice under a future QA system. A QA system should ensure that the minimum requirements that the external examiner assures are followed at a programme level and some consideration could be given to a subject specialist approach for external examiners, similar to that in Australia. However, this model is dependent on the rigour of the external examiner and as has already been noted, there is variation between external examiners. External examining sits alongside a framework within which institutions design, validate and assess their own academic programmes, with reference to the principles and guidance set out in the Quality Code.

Another concern about an external examining system that would require participants to undertake more rigorous training, is the appropriateness to those early career academics who may not feel that they have enough experience to put themselves forward. Indeed a reluctance to engage could also be true of those more experienced academics who may feel that it is unnecessary to engage with a training process for something that they may have been involved in for many years.

In some subject areas, providers also adhere to the requirements of PSRBs. PSRBs are valuable in terms of professional practice and curriculum content and coverage but they do not give assurances on academic standards. There is also no alignment of standards across

PSRBs and should there be a move to include PSRBs as part of a future QA process, there would need to be an assessment of the level of risk attached to each PSRB and the different levels of rigour they apply to their assurance. Currently, PSRBs are willing to dovetail with an institution's periodic review which helps to validate an institution's internal processes but it is important to ensure that there is no duplication between QA and PSRB reviews.

Question 3: Do you agree that future approaches to quality assessment should be based on an assumption that 'one size' can no longer sensibly fit all?

We would agree with this proposition and feel that approaches to external quality assessment should be both proportionate and contextual to the nature of the mission and provision of the HE provider. However, we believe that the current system of external assessment provides assurance to both students and stakeholders that a university is appropriately adhering to its own responsibilities for quality and brings benefits to universities, students and funders. Any move from this current system would need to take into account the risks versus benefits question and Universities Wales does not want to see a move to the risk-based system that has been outlined previously. There is however, an opportunity to discuss whether a move to a more enhancement-led system as in Scotland is desirable as the Welsh sector enters a more mature stage.

Question 4: Do you agree that there should be a baseline requirement for the quality of the academic experience for students, and that this should be published and maintained?

Universities Wales believe that a baseline requirement is essential, both in terms of assessing new entrants to the sector and to provide a minimum level of assurance for the sector as a whole. It is not clear how this would be achieved and the challenge will be in determining what constitutes a sufficiently meaningful 'baseline' to provide such a level of assurance. The need for a robust system that gains the international recognition should not be disregarded and it is important that this process does not have a destabilising effect on the perceptions of quality to the international community. The reputation of the current QA system internationally and the strength of 'brand QAA' should not be underestimated. The UK system is the only system in Europe that is fully compliant with all of the Bologna expectations. As a signatory to the Bologna Process and fundamental to the establishment of the European Higher Education Area (EHEA), all governments across the UK remain committed to the Process. Future QA arrangements will need to be mindful of the importance of remaining compliant with these standards and guidelines to avoid reputational damage to the UK HE system. The QAA has developed and enhanced the reputation of UK HE by building a robust system on a single set of frameworks and standards reviewed and therefore comparable across the UK. This national element gives international credibility and support to the UK's reputation for excellence. The UK is unique in having a framework at HE level which allows universities to innovate whilst at the same time guaranteeing threshold standards. Universities Wales is confident from interaction with the British Council in the UK and via overseas missions, that the quality arrangements in the UK are understood and respected by international authorities and it is important that this is perception is not put at risk by any future QA process.

Question 5: For England, do you agree with the proposal that an individual provider, once it has passed the gateway for entry into the publicly funded system in England, should not be repeatedly externally retested against the baseline requirements for an acceptable student academic experience, unless material evidence suggests otherwise?

N/A

Question 6: For Northern Ireland, do you agree that providers should provide annual evidence and assurance that they are meeting the baseline requirements for an acceptable student academic experience?

N/A

Question 7: Do you agree that the funding bodies' verification of an institution's review methodology provides a reasonable mechanism through which to operate risk-based scrutiny of a provider's arrangements to secure a good and improving student academic experience and student outcomes?

It is difficult to make an assessment based on the information provided as the detail is patchy to evaluate how such a risk-based approach would operate in practice. Universities Wales is in agreement that an explicitly risk-based approach is not the right way to proceed in Wales. The proposals to move to such an approach would need to be tested within the context of the HE (Wales) Act.

Question 8: Do you agree that student outcomes data should provide the basis for continuous improvement activities within an individual provider?

A high quality student-centred learning and teaching environment must place learning and teaching at the centre of any QA system. Care should be taken when considering how best to measure things such as enhancement for example as there are issues around moving to an approach that merely collects data sets. That said, student outcomes data can provide a useful measure of continuous improvement activities within an individual provider but is just one of many measures. Such data measures are increasingly being used by universities as part of their quality assessment processes. Universities Wales believes that the importance of the qualitative evidence obtained via the operation of quality assessment processes should not be underestimated, particularly the feedback received from students on the quality of their academic experience. Universities in Wales work hard with their student bodies to understand what they value and need and it is this partnership approach that will be crucial going forward. Students are partners at the heart of decision making processes in Wales and we consider it a step backwards to solely rely on student outcomes data as the basis for measuring our continuous improvement activities.

Universities and students in Wales made public their commitment to partnership through their sector-wide 'Partnership Statement' launched in 2013. The statement aims to help explain what is meant by 'partnership' and is intended to be used by both universities and students' unions as a basis for discussion, ensuring this partnership becomes tangible and

results in genuine enhancement. We believe that there is an opportunity to discuss whether a move to a more enhancement-led system as in Scotland is desirable as the Welsh sector enters a more mature stage and this is something that is missing from the discussion document.

Question 9: Do you agree that we should take forward into detailed design and pilot phases further work on the use of student outcomes data to identify patterns and trends and on the development of approaches for monitoring and supporting institutions as they address areas of concern?

Based on the response to question 8 that cautions against becoming solely reliant on student outcomes data, further exploration of how the use of student outcomes can benefit both universities and students, would be helpful in forming a better view. There is a danger of veering into a 'one size fits all' approach in terms of expectations. If used appropriately, outcome metrics can be an indicator of potential problems with institutional performance and guide interventions. It would be possible to use a limited number of existing metrics that are sufficiently robust and avoid any new collection requirements. Outcomes can also be benchmarked based on contextual characteristics of provision to avoid measuring institutional input. At this stage, we do not believe that there are realistic measures available that record the quality of teaching and learning. The academic achievement of students should not be included as an outcome metric. The development of the TEF however, may change this.

It is important that the different priorities of the devolved governments in the UK are considered as each may have different reporting requirements such as targets in relation to students studying through the medium of Welsh.

Question 10: In Northern Ireland, do you agree with the approach outlined to introduce more effective and consistent arrangements for collecting and analysing feedback from higher education learners?

N/A

Question 11: Do you agree with the proposal that more emphasis should be placed on the role of a provider's governing body to provide assurances about the quality of the student academic experience and student outcomes in line with the Higher Education Code of Governance? If you agree, please indicate what, if any, additional support they should receive to provide such assurances.

Universities Wales agrees in principle that governing bodies could have a greater role in overseeing and providing assurances regarding the operation of institutional quality assessment processes in support of the institution's mission and strategic plan. What is a concern however, is the potential for confusion of roles and responsibilities between the governing body (or Council) and Senates or Academic boards. Most, if not all Charters and Statutes or Instruments and Articles state that the responsibility for quality lies with the Senate or Academic Board so it is unclear whether the proposals to place a greater

responsibility on governing bodies require a change to an individual institutions governance documents.

It should also be noted that it is unclear whether governing bodies as they are currently constituted, would have the expertise to provide the assurances necessary. We believe that for this proposed approach to be effective, the composition of governing bodies may require a fundamental review of membership. Training needs would need to be considered and balanced with the time and personal resource that governors now dedicate to university business.

Question 12: For England, do you agree that, for English institutions, HEFCE should develop and use the existing external accountability mechanisms, particularly the HAR, in the ways described?

N/A

Question 13: For Northern Ireland, do you agree that DEL should develop and use the existing accountability mechanisms in the ways described?

N/A

Question 14: Do you agree that there should be a 'probationary period' for new entrants to the publicly funded sector in England?

N/A

Question 15: Do you agree that international activities should be included in the remit of future quality assessment arrangements as described?

There has been a growth of TNE over the last 10 years and the UK has been at the heart of this which brings with it challenges as well as opportunities, particularly around the cost of assessment. Universities Wales believes that for future quality assessment arrangements to have international recognition and validity as is the case with the current arrangements, it will be essential for international activities to be included in the remit. Some of the benefits identified in the current QA system include the Quality Code, the peer led systems, the external review and the link with Highly Trusted Sponsor Status and the international reputation aspects connected with the QAA brand overseas. Any future QA system should be able to provide assurance to past students as to the continued value of their award, current and prospective students as to the future value of their award plus funders and the public to ensure that the UK maintains its TNE reputation and the economic benefits that a healthy and vibrant sector brings to the economy of all UK nations. Universities Wales believes that this is an ideal opportunity to review costs and expectations with the current provider.

Question 16: Do you agree that a future quality assessment system must provide reliable assurances to students and other stakeholders about the maintenance of

academic output standards and their reasonable comparability across the UK higher education system?

Universities Wales believes that students should have confidence in the QA arrangements and that these should be a key objective of any external review system. Students should expect their institution to deliver in a way that is consistent with the information provided at point of entry and that arrangements are in place to allow for effective and consistent engagement throughout their time at university. Student expectations will evolve over time and universities will be constantly seeking to understand and address any differences in perception and expectation. With this in mind, a QA system should recognise the diversity of the student body and engage appropriately in the design and operation of reviews and evaluations. Students as partners is embedded across Welsh institutions and having students as full members of review teams must form part of any new QA system.

Universities and students in Wales made public their commitment to partnership through their sector-wide 'Partnership Statement' launched in 2013¹. The statement aims to help explain what is meant by 'partnership' and is intended to be used by both universities and students' unions as a basis for discussion, ensuring this partnership becomes tangible and results in genuine enhancement.

The key question to address when considering such assurances is the balance between the assurances provided by the autonomous degree-awarding body regarding the maintenance of its own standards as confirmed by external examiners and other institutional mechanisms and the assurances that would constitute 'reasonable comparability' across the UK HE sector. Universities Wales does not believe that a QA system should restrict innovation or flexibility by moving to a system where comparability is defined by a strict and standardised set of rules that would impinge on academic autonomy. There is a need however, for students and other key stakeholders to be convinced by the academic standards of degrees. It is crucial that expectations and guidance in the Quality Code that highlight the importance of consistency of assessment are not lost in the future. In Wales, the current degree classification system is embedded and introducing Grade Point Average, for example, would be a substantial change. Before considering any changes, student mobility and the portability of qualifications would need to be carefully considered such is the significance of student mobility across the UK. The Bologna Agreement on student mobility relies on the European framework therefore, recognition across borders is critical.

There has been little mention of what we believe is a fundamental strength of the current system, the UK Quality Code. This is the basis for external methods of assurance which can be tailored for differing needs, but retains at its core, review by peers drawn from the HE community and gives a common infrastructure for institutional level management. The Quality Code is more than a set of compliance rules however, as it sets out the threshold standards that guarantee a UK degree. It is this guarantee and confidence that sets the UK quality system apart from the rest of the world. Internationally there is an understanding of the strength of UK HE as a whole and the UK is unique in having a comprehensive framework at HE level which not only guarantees threshold standards but encourages experimentation and innovation. This is something that we feel should be retained in any new system.

¹ Partnership Statement, 2013 - <http://www.uniswales.ac.uk/wp/media/Partnership-Statement1.pdf>

Question 17: Do you agree that the external examining system should be strengthened in the ways proposed, ie through additional training and the establishment of a register?

Universities Wales believes that external examining is an important part of the current QA system and supports the setting and maintenance of academic standards. The current system could however, be improved as it currently only provides a slivered view of standards. As previously highlighted, the performance of external examiners is seen as varied and a future system could consider the development of a body of credible, trained external examiners that could allow the QA system to assess the student experience more holistically. It is difficult to identify from the document how much value the proposals would add to the external examiner system and we believe that care needs to be taken that the developments do not have the unintended consequence of discouraging academic staff from becoming, or continuing as, external examiners. Additional 'generic' training is likely to be of only limited value, since the institutional and discipline contexts are the critical ones in terms of the role of external examiners.

Welsh language requirements would also need to be taken into account and captured explicitly from the outset in the development of these proposals.

Question 18: Do you agree that our proposals in relation to the external examining system are sufficient, ie do they go far enough to provide the necessary assurances about academic output standards to students and other stakeholders?

Please see response to Q17 above. It is not clear whether the proposals intend to focus wholly on undergraduate academic output standards only.

Question 19: Do you agree that it would be helpful to explore approaches to the calibration of academic output standards in different disciplinary and multi-disciplinary contexts?

An effort to value assessment should be made before such work is undertaken as discussion in the Welsh sector of this particular issue concluded that this although this work may be useful, it is likely to be time-consuming and costly.

Question 20: Do you agree that providers should use the accreditation activities of at least some PSRBs more centrally in future approaches to quality assessment?

Professional, Statutory and Regulatory Bodies (PSRB) reassure stakeholders and assess competences rather than general skill sets and there could be an argument for a future QA system in assessing the areas outside those investigated by the PSRBs. PSRBs are valuable in terms of professional practice and curriculum content and coverage but they do not give assurances on academic standards. There is also no alignment of standards across PSRBs and should there be a move to include PSRBs as part of a future QA process, there would need to be an assessment of the level of risk attached to each PSRB and the different levels of rigour they apply to their assurance. Currently, PSRBs are willing to dovetail with an

institution's periodic review which helps to validate an institution's internal processes but it is important to ensure that there is no duplication between QA and PSRB reviews. That said, a number of universities already use the accreditation activities of PSRBs as an important element of their approach to quality assessment. Indeed, at a discipline level this is unavoidable in many professional subject areas (eg medicine, healthcare, engineering, law).

One concern is that the sheer volume and variety of approaches adopted by different PSRBs would create a greater burden and possible inconsistency as universities attempt to embed the requirements of individual PSRBs within a quality assessment system. It is unclear how the wider educational experience could be assessed by a PSRB unless significant changes are introduced by these organisations who are predominantly focused on professional skills and competencies.

Question 21: Do you agree with the proposal that we should place more emphasis on the role of the governing body of a provider with degree awarding powers to provide assurances about security and reasonable comparability of the academic output standards of students?

As outlined in Q11, there may be questions around the structure and skills set of a governing body were these changes to be introduced. That said, a number of universities already have systems in place to ensure that their Senates or equivalent are provided with necessary quality reports on an annual basis that report on matters such as validity and consistency of assessments and the security and comparability of academic standards. Feedback from members is that in most institutions, the chief academic authority will report directly to the governing body and that this is a reasonable expectation for such assurances to be provided by autonomous institutions in respect of the exercise of their degree-awarding powers.

Question 22: Do you agree with the proposal to develop guidance to providers on a sensible range of degree classification algorithms at the pass/fail and 2i/2ii borderlines?

It is difficult to understand the rationale behind the focus on the pass/fail and 2i/2ii borderlines that seemingly disregard other borderlines and potentially cutting across efforts to encourage assessors to make use of the full mark range (0-100 in most cases). Feedback from members is that the case for the development of a GPA approach has still not been clearly made. There is concern that this may increase variability and reduce consistency particularly if it operates in tandem with the existing classification system. This has the potential of causing confusion amongst students and employers which must be avoided. Feedback from members is that one of the purposes of external quality assessment should be to test how individual providers implement their stated approach to academic output standards. Being able to demonstrate the consistency and comparability of these standards allows universities to address any relevant issues arising and we believe that the basis for testing this approach should be the annual assurance statement.

Question 23: Do you agree with our proposals to develop and implement a strengthened mechanism to investigate rapidly when there is an indication of serious

problems within an individual provider which has not been addressed in a satisfactory and timely manner?

As a general observation, Universities Wales considers that the current QAA Concerns scheme works reasonably well and allows for problems to be investigated in a proportionate and evidence-based way and we believe that any future approach should be on the same proportionate and evidence-based basis. It should be noted that this issue is due to be consulted on by HEFCW as part of the implementation of the HE (Wales) Act.

It is worth noting here that we believe that the threshold for entry by a provider into the higher education sector should be pitched at a level that will ensure the robust reputation of the UK system is maintained and the risk minimised. In Wales, the HE (Wales) Bill includes a definition of quality and the potential for any provider to apply for automatic designation.

Question 24: Should the mechanism to investigate problems in an individual provider require, in addition to the investigation of the specific issue of concern, the re-testing of the arrangements in the provider under review against the baseline requirements set out for the gateway for entry to the higher education system?

Please see response to Q23.

Question 25: Do you agree with the proposal that providers seeking entry to the publicly funded sector in England and Northern Ireland should be tested, through an external peer review scrutiny process, against a set of baseline requirements for quality?

N/A

Question 26: Are there any particular areas of our proposals that you feel we should concentrate on as we undertake a more detailed design phase?

Response to Q28 refers.

Question 27: Are there proposals not referred to above that you feel we should have in consideration? If so, what are they and what is the rationale for their inclusion?

We believe that there is still a gap in the proposals around the involvement of students. The institutional review has been strengthened further by bringing students into review teams to give an added dimension and value and Universities Wales supports the current approach that places students at the centre of the system. Universities in Wales work hard with their student bodies to understand what they value and need and it is this partnership approach that is still missing from the discussion document. Students are partners at the heart of decision making processes in Wales and it will be important for any future co-owned quality system to focus on consistency for student engagement. It is the relationship between the institution and the students' union that Universities Wales considers paramount and must be retained.

Question 28: Are there any particular areas pertinent to the devolved nature of higher education in Wales and Northern Ireland that you feel we should have considered further? If so, what are they and what is the rationale for their inclusion?

Universities Wales is already interacting with HEFCW on the impact of the HE (Wales) Act in relation to its quality powers under the new Act. It is worth noting here that we consider the timing of this consultation to be difficult, with the potential risk of causing further fragmentation of approach across the UK if there is a piloting of these proposals.

Universities Wales believes that institutions should continue to be responsible for the quality and standards of their awards and that there should be a single system across the UK that has the scope to tailor review methods by country. With this in mind, a single provider of quality assurance is something that we feel strongly about.

It is important to highlight the positives in the current system that should be retained in any future design and accept that quality assurance cannot be seen in isolation but must take into account the wider context in which higher education operates. It is still not clear whether this conversation has taken into account other factors which impact on universities such as the importance of quality assurance for Home Office purposes in relation to visas and the Prevent agenda.