

**Substantive Change Report**  
by Quality Assurance Agency for Higher Education, UK (QAA)

Register Committee

Ref. RC20/C23

Ver. 1.0

Date 2017-11-24

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Decision of:	16/11/2017
Report received on:	13/07/2017
Agency registered since:	23/10/2017
Last external review report:	August 2013
Registered until:	31/08/2018
Absented themselves from decision-making:	N/A
Attachments:	<ol style="list-style-type: none"> <li>1. <a href="#">Substantive Change Report</a></li> <li>2. <a href="#">Clarification request of 31/08/2017</a></li> <li>3. <a href="#">Clarification response of 13/09/2017</a></li> </ol>

1. The Register Committee considered the Substantive Change Report of 31 July 2017.
2. The Register Committee noted that QAA discontinued the review of publicly funded providers in England and Northern Ireland and has introduced two new areas of external quality assurance activity: (1) *quality review visits* and (2) *investigation of unsatisfactory quality in England and Northern Ireland*.
3. Considering *quality review visits*, (gateway) the Committee confirmed that this is an activity within the scope of the ESG as it concerns the quality assurance of higher education providers that seek to enter into the higher education system of England or Northern Ireland.
4. With regards to the *investigation of unsatisfactory quality* the Committee found that the activity is within the scope of the ESG if it reaches stage two (after it was established that there is sufficient evidence to investigate a serious concern). The activity is within the scope of the ESG as long as the investigation addresses issues related to the quality of teaching and learning in higher education.
5. The Committee noted that the criteria for *quality review visits* follows QAA's evaluation model and in its development QAA ensured the involvement of stakeholders as part of its standard co-regulatory approach.
6. The Register Committee also took note of the changes introduced in **the follow-up processes for transnational education reviews**.

7. Considering the organisational structure and staffing, the Committee noted the efforts that were made by the agency to ensure the sustainability of its activities.
8. As some of the reported changes were unclear, QAA was asked to provide further clarifications to its change report (see attached the clarification request and response of the agency).
9. Considering the agency's clarifications, the Committee made the following notes:

The Committee noted that the **publication of reports and decisions** (ESG 2.6) in case of *quality review visits* is done by QAA after HEFCE Quality Committee (QARSAC) takes its final decision on the status of the provider.

In terms of **QAA's organisational structure** and staffing the Committee understood that the full extent of changes has yet to be implemented (e.g. a new Office for Students and designation of the quality body for England) and noted that QAA will monitor and review its resources accordingly.

In appointing the expert panel members for the *investigation of unsatisfactory quality* the Committee noted that QAA employs a clear selection process but found that students are included in expert panels only if the investigation relates to a matter that directly impacts the student experience or would benefit from student input.

10. **The Register Committee underlined that the ESG (as per standard 2.4) set out that external quality assurance should be carried out by panels including (a) student member(s), based on the assumption that student input is important and valuable in all external quality assurance of teaching and learning. Considering that investigations of unsatisfactory quality are only in partial compliance with ESG 2.4, the Register Committee would normally request a further report specifically on the issue of students in panels. The Committee, however, considered that such a report would not be necessary since QAA is anyway preparing for a review to renew its registration. Compliance with ESG 2.4 should thus be addressed within the upcoming external review process.**
11. The Register Committee noted that QAA is no longer responsible for the quality assurance of the entire system in England and that the responsibility is now being placed with The Higher Education Funding Council for England.

## Register Committee

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**Subject:** Substantive Change Report: Quality Assurance Agency for Higher Education, UK  
**From:** "f.crozier@qaa.ac.uk" <form\_engine@fs22.formsite.com>  
**Date:** 7/13/2017 2:52 PM  
**To:** substantive-changes@eqar.eu

<b>Reference #</b>	11905695
<b>Status</b>	Complete
<b>Login Username</b>	f.crozier
<b>Login Email</b>	f.crozier@qaa.ac.uk
<b>Agency #1 *</b>	Quality Assurance Agency for Higher Education, UK
<b>Expiry date #1 *</b>	31/07/2017
<b>Contact #1 *</b>	Fiona Crozier
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<b>Other organisations? *</b>	No
<b>A. Has the organisational identity of the registered agency changed? *</b>	No
<b>B. Has the organisational structure changed? *</b>	Yes
<b>Description *</b>	<p>As a result of reduced income QAA reviewed its organisational structure and staffing to ensure that we remain able to deliver the full range of services across the UK for which we are contracted or funded. These continue to include the external peer-led review of quality within the UK and of UK TNE, a range of enhancement activities, evaluation and analytical reporting, policy, stakeholder and student engagement, quality assurance and degree awarding powers scrutiny.</p> <p>QAA's new structure has four organisational areas of focus, three are externally oriented: Universities, Quality Enhancement and Standards; Colleges and Alternative Providers, Nations and International; while Resources supports operational effectiveness across all our work.</p>
<b>C.i. Are there new types of</b>	Yes

activities? \*

**C.ii. Are there changes in existing activities? \*** Yes

**C.iii. Have some or all existing activities been discontinued? \*** Yes

**Description new/changed \***

### Overview to explain the landscape of recent changes

The higher education funding bodies from across the UK each have a statutory duty to assure the quality of the education at institutions for whom they provide financial support and have contracted QAA to undertake quality assessment on their behalf. Following a review of quality assessment undertaken by the Higher Education Funding Council for England (HEFCE) in 2015-16 with the higher education funding bodies in Wales and Northern Ireland, as part of their respective statutory responsibilities, and piloting in 2016-17, a new approach to quality assessment will be implemented in England and Northern Ireland from 2017-18. Currently, the changes described below apply to publicly funded higher education providers in England and Northern Ireland only. Arrangements in Wales and Scotland remain substantially unchanged as do the arrangements for Alternative Providers (which continue to be reviewed by QAA under the established Higher Education Review method). QAA's work covering Transnational Review and associated strategic international engagement will remain a UK-wide process and is also substantially unchanged.

In England and Northern Ireland QAA delivers two areas of activity on behalf of HEFCE and the Department for the Economy Northern Ireland. These are:

**Quality Review Visits:** this is the gateway process for entry into the higher education system (this process will test the suitability of institutions that apply to enter the HE system as an HE provider in England or Northern Ireland). The Higher Education Funding Council for Wales may join this contract for 2017-18. See Document 1

**Investigation of unsatisfactory quality.** This will be a two-stage process intended to pick up any issues raised through other external mechanisms that give cause for concern. The first stage will be operated by the funding body and will establish whether there is sufficient evidence of a serious problem to require further investigation and intervention. If this is the case, the funding body will at a second stage, undertake detailed investigation of the issues, and may if appropriate commission an external review of the provider to investigate the prima facie issue in depth. This latter would be carried out by QAA. See Document 2.

## Background information about the new arrangements: UK's Baseline requirements

Operating models across the UK are underpinned by a set of baseline regulatory requirements. These requirements are designed to ensure that all providers operating in the higher education system are able to deliver a high quality academic experience for students, to protect degree standards, and the student interest more broadly. These requirements are now overseen by the UK-wide Standing Committee on Quality Assessment established in autumn 2016. See Document 3.

The review of established publicly funded providers in England and Northern Ireland is now conducted by HEFCE and does not fall within the scope of QAA's work (see below).

Generic characteristics that applies to all of the activities described

### **Involvement of stakeholders in design and continuous improvement of EQA (ESG 2.2)**

QAA continues to consult stakeholders in the design of review methods and to evaluate the delivery of its review methods; we continue to have a broad range of stakeholders on our governing Board and committees.

### **Criteria used, how they were developed**

The majority of the criteria used for the new processes are already in existence and have been brought together through the Baseline Requirements (documents attached). This is a varied set of criteria from different sources. The development and maintenance of those maintained by QAA (e.g. the Quality Code) has not changed, i.e. through a co-regulatory approach with the HE sector and other stakeholders.

### **Measures implemented to ensure consistency**

Consistency will be maintained through the use of the baseline requirements, Handbooks or guidance for all quality review processes delivered by QAA and by training reviewers who will take part in the reviews. Handbooks/guidance are attached to this document and reviewer training has been carried out. (NB: the baseline requirements are comparable across the UK, facilitating consistency in the outcomes of external QA across the UK's four devolved nations).

### **How ESG 1.1 – 1.10 are reflected in the criteria (ESG 2.1 & 2.5)**

The principle of responsibility for quality assurance lying with the individual institution is

enshrined in the new developments, and the expectation will be that the governing body of each higher education provider will take more responsibility for the assurance of quality. The same expectations for internal quality assurance will apply and the existing reference point (the Quality Code, now part of the Baseline Requirements) will remain key.

All changed processes for which QAA is responsible will be governed by a Handbook which sets out the process, the criteria used (or reference to them) and outcomes. Handbooks are attached.

NB Unchanged processes are not detailed below but in the section that follows

### **Review team composition, selection, appointment and training of reviewers (ESG 2.4)**

There is no substantive change to how QAA selects, appoints and trains reviewers, nor to the way it composes teams.

### **Site visits (ESG 2.3)**

The Quality Review Visits and TNE review processes both involve site visits. Stage two of an investigation will involve a tailored peer review visit to the provider.

### **Publication of reports (ESG 2.6)**

Responsibility for publishing the reports lies with HEFCE.

### **Follow-up (ESG 2.3)**

The Quality Review Visit process will result in one of three judgements: satisfactory (the provider may enter the HE sector); satisfactory with conditions (the provider may enter the HE sector but with an action plan to address areas of immediate concern) or unsatisfactory (the provider may not enter the HE sector). For the first two outcomes, a developmental period of enhanced scrutiny and support will follow. This will last for four years, during which the provider will undertake any developmental activities identified in its action plan and also undergo an annual provider review by HEFCE. At the end of the four year period, there will be a further peer review visit and at this point, the funding council will use the evidence provided to decide if the provider is ready to move on from the developmental period into the process for established providers.

Review of Transnational Education: the findings of TNE Review will feed into QAA's review processes i.e.: Enhancement-Led Institutional Review in Scotland, Quality

Enhancement Review in Wales and Higher Education Review (Alternative Providers), this aspect is unchanged. QAA's institution-level processes will follow up any recommendations made as part of TNE Review visits and are, likewise, substantially unchanged.

Following the publication of TNE outcomes, QAA will liaise with reviewed providers to organise a workshop where QAA and providers can discuss and share the lessons learned from the review visits. This is a change and addition to the previous process. Providers not involved in the TNE Review visits may be able to attend, depending on places available. A summary of the outcomes of the workshop will be made publicly available and disseminated to the whole sector. See Document 4.

If serious concerns about academic standards and quality are identified as part of TNE Review these may be subject to investigation either by the respective funding body in England and Northern Ireland or by QAA in Wales and Scotland and for Alternative Providers. This aspect of the process is substantially unchanged.

### **Appeals system (ESG 2.7)**

Quality Review Visit: an appeals process is available to institutions, maintaining our established practice.

### **Embedding in thematic analyses and internal quality assurance of the agency (ESG 3.4 & 3.6)**

QAA's activities in relation to thematic analyses of its work and the internal quality assurance of the agency remain unchanged. The former is now enhanced by the work of a dedicated Evaluation and Data Analytics team.

**For new activities, please explain if they were developed from scratch or on the basis of existing activities that were subject to the last external review:**

Although the landscape in which the processes described above has changed, the development of the methodologies built on existing activity and on QAA's 20 years of experience in conducting external institutional review processes and degree awarding powers scrutinies, on process for investigating concerns and on previous TNE review processes. All of these were cognisant of the ESG.

#### **List discontinued \***

The process of HER for publicly funded higher education providers in England and Northern Ireland has been discontinued. This has been replaced by the operating framework described earlier, including a system of annual provider review and 5 yearly

accountability review by HEFCE, supplemented by the elements of the framework contracted to QAA.

<b>File #1</b>	<a href="#">UKSC text for web 24 4 17.pdf (325k)</a>
<b>File #2</b>	<a href="#">Quality-Review-Visit-Handbook-2016.pdf (360k)</a>
<b>File #3</b>	<a href="#">Guidance notes for UQSI teams 170425.pdf (288k)</a>
<b>Last Update</b>	2017-07-13 14:52:22
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<b>Finish Time</b>	2017-07-13 14:52:22



Brussels, 31 August 2017

## Substantive Change Report – Further Information Request

Dear Fiona,

We wish to thank you for the Substantive Change Report of 31 July 2017. Your report is currently being reviewed by two rapporteurs before it is brought to the attention of the entire EQAR Register Committee.

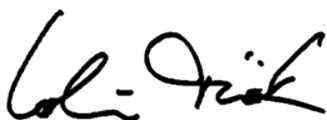
In order to prepare consideration by the Committee, we would be obliged if you could clarify the following query.

- We note from the change report that the responsibility of publishing the decision and reports for quality reviews lies with HEFCE. Could you please clarify whether QAA provides any information and links to the published reports and decisions?
- Could you further clarify how are expert panel members selected and appointed in cases where QAA carries out a detailed investigation of unsatisfactory quality, upon referral from HEFCE and in particular whether a student member is included?
- We further note that QAA made a number of changes in its organisational structure and staffing. Could you briefly elaborate what are the main changes related to the allocation of human and financial resources?

We kindly ask you for a reply by **14 September 2017**. Please inform us if any difficulties arise in meeting this deadline.

I shall be at your disposal if you have any further questions or inquiries.

Kind regards,



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(Director)

## **Substantive change report: request by EQAR for further information**

**Point 1: We note from the change report that the responsibility of publishing the decision and reports for quality reviews lies with HEFCE. Could you please clarify whether QAA provides any information and links to the published reports and decisions?**

For QRV, QAA publishes the reports and the judgements which result from the review process on its website, however, we do so only after the HEFCE Quality Committee (QARSAC) makes a decision on the status of the provider. In making a decision about the status of the provider QARSAC will consider multiple factors, one of which is the QRV judgement. The QAA webpage where the report and the judgements are presented links to the HEFCE register, and the HEFCE register links to the QAA website. For example please see: <http://www.qaa.ac.uk/reviews-and-reports/provider?UKPRN=10000948#.Wa6PoK1TFaQ>

**Point 2: Could you further clarify how are expert panel members selected and appointed in cases where QAA carries out a detailed investigation of unsatisfactory quality, upon referral from HEFCE and in particular whether a student member is included?**

Reviewers (expert panel members) for unsatisfactory quality investigations are selected from our pool of peer academic and professional reviewers. In selecting panel members, we ensure an appropriate match between the scope of the investigation and the areas of expertise of the reviewers. We also ensure that the panel members have experience of the type of provider to which they have been allocated. For example, for a large research-intensive university we would aim to include a reviewer from a similar type of institution who would have the relevant contextual background. Where the investigation relates to a matter that directly impacts the student experience and would benefit from student input then a student reviewer is also included as a full member of the team. For example, we recently undertook four investigations into concerns about student satisfaction and retention, and a student reviewer was included in each of these teams.

When appointing reviewers we take care to ensure there are no conflicts of interest and all reviewers are required to complete an online briefing on the review method for unsatisfactory quality investigations.

**Point 3: We further note that QAA made a number of changes in its organisational structure and staffing. Could you briefly elaborate what are the main changes related to the allocation of human and financial resources?**

In 2016 QAA undertook a significant organisational change to ensure the Agency remained in a position to provide stability following, and preceding further, significant changes to external quality assurance systems in the UK. The full extent of change has not yet been implemented (e.g. the Office for Students and designation of the quality body for England) so QAA continues to monitor and review its resources to ensure they are appropriate:

### *Human resources*

The Agency has adapted effectively to the wider changes to the quality assessment landscape in the UK. In 2016 QAA undertook a restructure of the organisation to reflect the changing nature of its work. The

new structure more directly aligns with the diverse nature of UK higher education and the providers with which QAA works, with the new directorate areas highlighting the value of our work with universities, colleges, alternative providers, and the devolved nature of UK higher education and the international emphasis of the sector's work. QAA currently has 147 staff (119.9 full time equivalents) who bring experience from within the higher education sector, from other professional backgrounds, and from a range of national and international contexts. To ensure it can meet the demands of its work QAA has adopted a flexible staffing structure with staff employed on full time and fractional contract bases. This brings additional experience and flexibility to the staffing profile of the agency.

#### *Financial resources*

QAA's funding model continues to evolve along with the quality assessment landscape. There are three main sources of income: from contract agreements with the four funding bodies in the UK, subscriptions from providers and other contract work delivered both in the UK and internationally. QAA's contract arrangements with the funding councils in England, Northern Ireland and Wales changed significantly in 2016. A robust financial planning reporting system ensures QAA maintains sufficient oversight of this area.