

Report of the Panel appointed to undertake a review of the UK Quality Assurance Agency (QAA) for the purposes of renewal of full membership of the European Association for Quality Assurance in Higher Education (ENQA)

2 July 2013

## **Executive Summary**

This is the report of the review of the UK Quality Assurance Agency (QAA) undertaken in May, 2013, for the purpose of determining whether QAA meets the criteria for renewal of full membership of the European Association for Quality Assurance in Higher Education (ENQA).

The report describes:

- the background and context for the review
- how the review was carried out
- the place of the Agency in the UK's quality assurance structure for HE and the Agency's main functions
- the Panel's assessment of the engagement of the Agency with the ENQA membership provisions/ European Standards and Guidelines and its conclusions
- the Panel's general observations and recommendations for development.

<b>Glossary of terms</b>	
Access to Higher Education Diploma	A specific qualification that provides a preparation for entry to higher education for adult students without traditional entry qualifications
ACDAP	Advisory Committee on Degree-Awarding Powers
APL	Accreditation of prior learning
APCL	Accreditation of prior certificated learning
APEL	Accreditation of prior experiential learning
BIS	Department for Business, Innovation and Skills (UK Government Department)
DAP	Degree awarding powers
DELNI	Department for Employment and Learning (Northern Ireland)
ECTS	European Credit Transfer and Accumulation System
EHEA	European Higher Education Area
ELIR	Enhancement-led Institutional Review (Scotland)
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
ESG	European Standards and Guidelines for Quality Assurance in the European Higher Education Area
ESU	European Students' Union
EUA	European University Association
FDAP	Foundation Degree awarding powers
FE	Further Education
FHEQ	The Framework for Higher Education Qualifications in England, Wales and Northern Ireland
FQ-EHEA	The Framework for Qualifications of the European Higher Education Area
FQHEIS	The Framework for Qualifications of Higher Education Institutions in Scotland
GuildHE	Guild Higher Education
HEFCE	Higher Education Funding Council for England
HEFCW	Higher Education Funding Council for Wales
HEI	Higher Education Institution
HESA	Higher Education Statistics Agency (UK)
HEW	Higher Education Wales
HTS	'Highly Trusted Sponsor status' (granted by the Home Office – previously by the UK Border Agency)
INQAAHE	International Network for Quality Assurance Agencies in Higher Education
IRENI	Institutional Review in England & Northern Ireland (for HEIs)
IQER	Integrated quality and enhancement review (for FE Colleges)
PSRB	Professional, statutory or regulatory body - an organisation that oversees the activities of a particular profession and represents the interests of its members and which may set the benchmark standards for, and regulate, the standards of entry into a particular profession.
QAA	Quality Assurance Agency
Quality Code	UK Quality Code for Higher Education
RDAP	Research degree-awarding powers
SFC	Scottish Funding Council
'Statutory Body'	An organisation set up through Act of Parliament that has a legal requirement to oversee a particular profession
TDAP	Taught degree-awarding powers
University College	An institution recognised by the UK authorities as an independent, self-governing body that can award its own taught degrees.
University Title	The entitlement of an institution to call itself a university.
UScotland	Universities Scotland
UKC	UK Council of Colleges
UUK	Universities UK
QAA also provides a full glossary on its website, explaining terms that are frequently used in its work and publications: <a href="http://www.qaa.ac.uk/aboutus/glossary">www.qaa.ac.uk/aboutus/glossary</a>	

## **Background and outline of the review process**

1. The Statutes of ENQA require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they fulfil the membership provisions.

In November 2004, the General Assembly of ENQA agreed that the third part of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) should be incorporated into the membership provisions of its (then) Regulations (now Statutes). Substantial compliance with the ESG thus became the principal criterion for membership of ENQA. The ESG were subsequently adopted at the Bergen ministerial meeting of the Bologna Process in 2005.

The third part of the ESG covers the approach to be taken to the cyclical external reviews of quality assurance and accreditation agencies. The external review of QAA was conducted in line with the process described in the ESG (third edition) and in the accompanying ENQA Guidelines for external reviews of quality assurance agencies in the European Higher Education Area and in accordance with the timeline set out in the Terms of Reference determined for this particular review.

## **Purpose and initiation of the review process**

2. QAA was last evaluated for the purpose of acquiring ENQA membership in 2008, with a positive decision taken by the ENQA Board. Therefore, in accordance with ENQA standard requirements, QAA was due to undergo a new evaluation process for the purpose of extending its membership in ENQA, which also serves as an indicator for registration in EQAR. Following QAA's application to ENQA to initiate this process, ENQA established an evaluation Panel, the composition of which met standard ENQA practice and which was duly briefed by ENQA prior to the Panel site visit to QAA.

## **Membership of the Panel**

3. The members of the Panel appointed by ENQA to undertake the review were:

**Jürgen Kohler**, (*Chair of the Panel*), Professor of Law, Greifswald University, (Germany)

**Paul Mitchell**, (*Secretary to the Panel*), Director of Mega Mitchell Consulting Ltd., (UK)

**Vanessa Duclos**, Officer, Institutional and International Relations Unit, National Agency for Quality Assessment and Accreditation (ANECA), (Spain)

**Dionyssis Kladis**, (*EUA nomination*), Professor of Higher Education Policy, University of the Peloponnese, (Greece)

**Henni Saarela**, (*ESU nomination*), International Officer at the Student Union of the University of Oulu, (Finland).

## **Terms of Reference for the Review**

4. ENQA has identified two types of external review which may be undertaken for the purpose of seeking membership:

- **Type A** - the sole purpose of which is to fulfil the periodic external review requirement for ENQA membership
- **Type B** - a review which has a number of purposes, only one of which is to fulfil the periodic external review requirement of ENQA membership.

This review was a **Type A** review, and evaluates how, and to what extent, QAA fulfils the criteria for full ENQA membership and thus the Standards and

Guidelines for Quality Assurance in the European Higher Education Area. The review was co-ordinated by ENQA itself at the invitation of QAA.

### **Approach and Procedure**

5. The review was carried out using a process designed and managed by the Panel following established ENQA practice, independently of QAA. The Panel sought to conduct the review in a manner that was not only professional and courteous, but also constructively searching and challenging. QAA produced a self-evaluation report (extensively referenced) which provided a substantial portion of the evidence that the Panel used to form its conclusions. The Panel conducted a site-visit to validate fully the self-evaluation and to clarify points at issue. Finally, the review panel produced the present final report on the basis of the self-evaluation report, the site visit and its findings. As part of the process, the Panel has provided an opportunity for QAA to comment on the factual accuracy of the draft report. The Panel confirms that it was given access to all documents and personnel it wished to consult throughout the review. During the site visit, the Panel was met with candour, courtesy and helpfulness throughout.

In fulfilling the purposes of the review, the Panel has:

- considered the broad professional and political contexts within which QAA operates
- considered a self-evaluation document prepared by QAA, a range of supporting documents submitted in advance of the site visit and extensive web-based materials (Appendix 1)
- considered additional documentation relevant to the Panel's lines of enquiry during the site visit (Appendix 2)
- conducted a two-day visit to QAA (8 – 9 May 2013), at the QAA's headquarters in Gloucester, UK (Appendix 1)
- met a range of stakeholders (from categories selected by the Panel) (Appendix 1), representative of all QAA's operations, including:
  - Chair of QAA Board and other Board members (including a student member)
  - Chief Executive of QAA
  - senior QAA managerial staff with individual responsibility for specific operational strands of QAA activity
  - cross section of QAA's professional staff
  - a sample of QAA-appointed reviewers (including student reviewers)
  - a sample of senior representatives from HEIs who are directly responsible for the management of quality assurance for teaching and learning in their institutions (and with direct experience of different types of QAA procedures)
  - students with experience of QAA's quality assurance procedures and/or who act in an advisory capacity
  - a Funding Council (HEFCE) representative
  - Sample of stakeholders from employer/professional, statutory and regulatory bodies (PSRBs)

### **Self-evaluation document**

6. The self-evaluation document submitted by QAA (March, 2013) comprised an account of the following principal areas:

- Foreword by the Chief Executive
- Executive summary
- Introduction
  - UK higher education providers and recognised awarding bodies
  - Students and staff statistics
  - Qualifications frameworks and examples of the typical higher education qualifications at each level of the FHEQ and the corresponding cycle of the FQ-EHEA
  - UK degrees
  - Recent UK higher education policy developments
- About QAA
  - Origins
  - Mission
  - Corporate legal status
  - Financial arrangements
  - Governance (Board, Chief Executive and organisational structure)
- QAA's main areas of work in the UK
  - Reviews of higher education providers
  - UK Quality Code for Higher Education
  - Enhancement
  - Advice to Government on degree-awarding powers and university title
  - Working with students
  - Investigating concerns about higher education providers
  - Regulation of the Access to Higher Education Diploma
  - Commercial activity
  - International activity
  - QAA membership of UK higher education sector partnerships and of UK leadership groups
- QAA Strategy 2011-14
- QAA progress since the 2008 ENQA review
- QAA's detailed assessment of its compliance with each of the European Standards and Guidelines (Parts 2 and 3) and with ENQA criterion 8
- Development of the QAA self-evaluation report
- QAA: current challenges and areas for future development
- Additional reference materials (see Appendix 2)
- Glossary
- Acknowledgements

The document had been widely disseminated and discussed across QAA itself. All categories of staff who met the Panel confirmed ownership of the document and opportunities for input to it. Input had also been sought from QAA Board members, the QAA Scotland Committee, the QAA Wales Committee, the Student Advisory Board and a range of external professional, statutory and regulatory bodies. As a tool for self improvement, the Panel considered the self-evaluation document to be well constructed and robustly reflective. It revealed a considerable capacity both for self-reflection and analysis of the organisation's current performance and for describing very clearly QAA's future strategic direction.

### School education in the UK context:

7. The structure of the school education system in England and Wales, Scotland and Northern Ireland varies across the nations, but is broadly divided into four distinct stages:

- Nursery Education
- Primary education (4/5 years old to 11 years old)
- Secondary education (11/12 years old to 16 years old)
- Sixth form/further education (16 years old to 18 years old).

By law, all children of compulsory school age (between 5 and 16) must receive a full-time education. A National Curriculum was introduced in England and Wales in 1992 and state schools are required to adhere to it. The term "National Curriculum" refers to England & Wales only. In Northern Ireland there is a common curriculum, and in Scotland the nearest equivalent is the 5-14 programme (national curricular guidelines). Testing takes place at various stages in all 3 education systems but the term "Key Stage" refers to England, Wales and Northern Ireland only. After secondary schooling, many pupils go on to further education colleges (typically for vocational or technical courses) or may take a higher level of secondary school examinations (known in England for example as A-Levels, typically in 2-4 subjects), after a further two years of study. A-Levels (short for Advanced level) or their equivalent are required for university entrance in the UK.

Independent schools, 'private schools' or 'public schools' are privately funded from tuition fees and are independent of Government control, although a number follow the National Curriculum.

### UK context: Higher Education

8. According to the UK's Higher Education Statistics Agency (HESA), UK student and staff numbers for the 2011-12 academic year were as follows:

Location	England	Scotland	Wales	Northern Ireland	Overall UK +
Students (Undergraduate and postgraduate)	2,097,230	216,320	131,185	51,905	2,496,645*
Staff (academic)	152,630	16,735	8,925	3,095	181,385
Staff (non-academic)	159,980	21,720	11,245	3,915	196,860
+Note 1	HESA data on students studying wholly outside the UK with a UK provider in 2011-12 show 76,360 students within the European Union and 494,650 outside the European Union. This includes both students registered with a UK higher education provider, and also students studying for an award from a UK provider. The students may be studying on an international campus, by distance/flexible/distributed learning, or through a collaborative or partnership arrangement.				
*Note 2	International student numbers included in total: <ul style="list-style-type: none"><li>• 302,680 (12.1%) from non-EU countries</li><li>• 132,550 (5.3%) from (non-UK) EU countries.</li></ul>				

### **UK context: Higher Education Providers**

9. The UK has a diverse range of higher education providers, which are independent and autonomous (not owned by the state). Higher education providers with the power to award UK degrees are known as 'Recognised Bodies', and a full list is published by the UK Government's Department for Business, Innovation and Skills. There are around 160 providers in the UK that are permitted to award degrees and are recognised by the UK authorities (UK and Scottish Parliament, Welsh and Northern Ireland Assemblies). The UK authorities recognise those providers which have been granted degree-awarding powers, either by a Royal Charter, an Act of Parliament or by the Privy Council (a formal body of advisers to the Queen). All UK universities and some higher education colleges are Recognised Bodies.

Each UK degree must be awarded by a legally approved degree-awarding body (a 'Recognised Body') that has overall responsibility for the academic standards and quality of the qualification. In the UK, the Privy Council is a formal body of advisers to the Queen and one of its responsibilities is the granting of degree-awarding powers and university title to new applicants. QAA advises the Privy Council on applications for degree-awarding powers and university title. All applications are scrutinised against guidance and criteria for each of the three types of degree-awarding powers, across the four nations of the UK.

There are three types (levels) of degree-awarding powers:

- Foundation degree awarding powers (FDAP) (not applicable in Scotland)
- Taught degree-awarding powers (TDAP)
- Research degree-awarding powers (RDAP)

In addition to providers awarding their own degrees, there are also over 700 colleges and other providers which do not have their own degree-awarding powers, but provide complete courses leading to recognised UK degrees. These providers are known as 'Listed Bodies'. Courses offered by 'Listed Bodies' are validated by providers which do have degree-awarding powers.

### **UK context: National Qualification frameworks**

10. QAA is the 'custodian' of the frameworks and reference points for UK higher education qualifications, which apply to degrees, diplomas, certificates and other academic awards granted by a higher education provider with degree-awarding powers. The qualifications frameworks are:

- The framework for higher education qualifications in England, Wales and Northern Ireland (FHEQ) (which forms a part of the overarching Credit and Qualifications Framework for Wales)
- The framework for qualifications of higher education institutions in Scotland (FQHEIS) (which forms a part of the overarching Scottish Credit and Qualifications Framework).

In accordance with the Bologna process, the Scottish framework, FQHEIS, was verified as compatible with the Framework for Qualifications of the European Higher Education Area (FQ-EHEA) in December 2006. In November 2008, the FHEQ was verified as compatible with the FQ-EHEA. Examples of the typical higher education qualifications at each level of the FHEQ and the corresponding cycle of the FQ-EHEA are shown below. Within each level, the various qualifications involve different volumes of learning and hence differences in the range of intended learning outcomes.



<b>Typical higher education qualifications within each level</b>	<b>FHEQ level</b>	<b>Corresponding FQ-EHEA cycle</b>
Doctoral degrees (e.g. Ph.D. /D.Phil. (including new-route Ph.D. / Ed.D. / D.B.A. / D.Clin.Psy.)	8	Third cycle (end of cycle) qualifications
Master's degrees (e.g. M.Phil. / M.Litt. / M.Res. / M.A. / M.Sc.)	7	Second cycle (end of cycle) qualifications
Integrated master's degrees (e.g. M.Eng. / M.Chem. / M.Phys. / M.Pharm.)		
Postgraduate diplomas		
Postgraduate Certificate in Education (P.G.C.E.)		
Postgraduate certificates		
Bachelor's degrees with honours(e.g. B.A. / B.Sc. Hons)	6	First cycle (end of cycle) qualifications
Bachelor's degrees		
Graduate diplomas		
Graduate certificates		
Foundation Degrees (e.g. Fd.A. / Fd.Sc.)	5	Short cycle (within or linked to the first cycle) qualifications
Diplomas of Higher Education (Dip.H.E.)		
Higher National Diplomas (H.N.D.)		
Higher National Certificates (H.N.C.)	4	
Certificates of Higher Education (Cert.H.E.)		

## Recent HE policy developments across the UK

### England

11. In 2011, the UK Government published a White Paper entitled *Students at the Heart of the System*, which proposed a number of significant higher education policy changes. One of the proposed changes was to remove the regulatory barriers that prevent equal competition between higher education providers of all types - including further education colleges and other alternative providers - to further improve student choice and to support a more diverse sector.

Another proposed change was the introduction of a more risk-based approach to quality assurance in England (and potentially Northern Ireland). The White Paper proposed that, in future, the nature, frequency and intensity of external quality assurance would be guided by each higher education provider's record in quality assurance and the nature of its provision.

During the summer of 2012, the Higher Education Funding Council for England (HEFCE) undertook a consultation with the higher education sector on the more risk-based approach. The results of the consultation were published in October 2012, in a report entitled: *A risk-based approach to quality assurance: outcomes of consultation and next steps*. In November 2012, HEFCE issued a letter of guidance to QAA on the development of the new review method. Its key features will include a six-year review cycle for those higher education providers with a longer track record of successfully assuring quality and standards, and a four-year review cycle for those providers with a shorter track record. Following further consultation (opened on 28 January 2013) with the sector on the proposed new review method (to be named *Higher Education Review*), QAA will adopt this approach in England from the 2013-14 academic year. It has also been agreed that Higher Education Review will be adopted in Northern Ireland in the same timescale. At the time of the Panel's site visit, the consultation process had closed and its results were undergoing scrutiny, with the intention of publishing QAA's proposals for making the risk-based approach to quality assurance operational. Therefore, the Panel was not yet in a position to judge on the concept and its implementation fully.

### Northern Ireland

12. In April 2012, Northern Ireland launched its first higher education strategy, *Graduating to Success*, setting out the direction for higher education policy in Northern Ireland between 2012 and 2020. Of particular relevance to QAA is an intention to establish a single quality assurance framework for all higher education provision in Northern Ireland by 2016. The framework will be developed in consultation with QAA.

### Scotland

13. Scotland finished a review of its quality framework at the end of the academic year 2011-12. It has retained its national programme of enhancement-led institutional review, comprising a four-year review cycle, an annual visit by QAA officers to each institution, and annual reporting to the Scottish Funding Council by each institution and by QAA. *Enhancement-led Institutional Review (ELIR)* is QAA's review method for universities and other higher education institutions in Scotland. Its main focus is to consider an institution's strategic approach to enhancement, placing a particular emphasis on the arrangements for improving the student learning experience. It also examines the institution's ability to secure the academic standards of its awards. Following the 2011 review, QAA Scotland will now provide an additional range of

annual briefings to the Scottish Funding Council, both on each individual higher education provider and also on the overall health of quality assurance arrangements across the Scottish higher education sector. The review of the quality framework also retained a model of national Enhancement Themes, managed by QAA Scotland. The third cycle of ELIR is now underway in Scotland and will run from 2012-16.

## **Wales**

14. In September 2012, QAA introduced a revised approach to Institutional Review in Wales, including changes to outcome judgements. Also in 2012, the Welsh Government introduced major changes to its funding system, with a new tuition fee regime for students. The Welsh Government also carried out a consultation on its draft Further and Higher Education (Wales) Bill, which it expects to bring forward in 2013. The proposals include:

- arrangements for quality assurance and enhancement of provision
- provision for effectively funded students' unions and purposeful student charters
- powers of direct funding for higher education providers
- amendments to the functions of the Higher Education Funding Council for Wales (HEFCW) as a result of the new funding and student-support arrangements.

## Profile of QAA

15. The Quality Assurance Agency for Higher Education (QAA) is a UK-wide agency covering England, Northern Ireland, Scotland and Wales. It was founded in 1997 as a registered charity and a company limited by guarantee. Its stated mission is to safeguard standards and improve the quality of UK higher education. It covers the four nations of the UK, in a context where higher education policies are determined individually by each of the four nations, within a higher education system that is 'devolved'. QAA itself operates as a single entity across the whole of the UK. It has offices operating in England, Scotland and, of smaller size, in Wales. QAA employs a number of review methods for different types of UK higher education providers, including universities, university colleges, further education colleges and alternative providers, as well as for professional programmes and transnational (international) provision.

## QAA funding

16. QAA is funded through a number of channels:

- subscriptions from higher education providers (all publicly funded higher education providers in the UK subscribe to QAA and pay an annual fee, as do some that are not publicly funded)
- contracts and agreements with the UK funding agencies for HE:
  - Higher Education Funding Council for England
  - Scottish Further and Higher Education Funding Council, and Universities Scotland
  - Higher Education Funding Council for Wales and Higher Education Wales
  - Department for Employment and Learning in Northern Ireland
- Review fees for providers of higher education seeking 'educational oversight' (recognition) for (student recruitment) immigration purposes (as required by the UK Border Agency) and a subsequent annual maintenance charge
- contracts with the General Osteopathic Council (GOsC) and the Teaching Agency for Early Years Professional Status (EYPS)
- additional private contracts, consultancy and business development work in the UK and internationally, subject to no conflicts of interest.

Broad categories of income for the operating year, 1 August 2011 – 31 July 2012 are shown below.

<b>Sources of QAA funding for 2011-2012</b>	£	%
Higher education funding bodies	6,689,096	47.7
Subscriptions	4,436,398	31.6
Educational oversight charges	2,353,676	16.8
Other charitable contracts	230,326	1.6
Other charitable income	168,012	1.2
Investment income	85,304	0.6
Activities for generating funds	65,925	0.5
Total charitable income	13,877,508	
<b>Total</b>	14,028,737 (= approx. € 16,553,909)	

### **QAA Governance: QAA Board of Directors**

17. QAA is governed by an independent Board of Directors, hereafter referred to as the QAA Board). The QAA Board is responsible for policy development, for the conduct of the Agency's finances and for monitoring its performance against agreed targets. The QAA Board has 17 members who represent a wide range of interests, both within higher education and in other areas. Board membership includes four nominees of UK higher education and further education provider organisations, and four representatives nominated by the higher education Funding Councils. An additional nine members are appointed by the Board of directors. Of these, six are co-opted by the aforementioned 'institutional' members on the basis of their experience of industry, commerce, finance or the practice of a profession. In addition, there are also now two student Board members, with one of them being proposed by the National Union of Students and the other being either a registered student, a student union representative, or an elected officer of a student representative organisation. One member is appointed by the Board, subject to a nomination put forward by the UK Council of Colleges. All members of the Board act in their personal capacity.

According to paragraph 38 of the *Code of Best Practice for Members of the QAA Board* (March 2013), the QAA Board has ten sub-committees:

- Access Recognition and Licensing Committee
- Advisory Committee on Degree-Awarding Powers
- Audit Committee
- Business Development Committee
- Finance and Strategy Committee
- Nominations Committee
- QAA Wales Committee
- QAA Scotland Committee
- Remuneration Committee
- Student Advisory Board, the latter being a recent addition and replacing the former informal Student Sounding Board.

The membership and terms of reference of all Board committees are set out in a Code of Best Practice for Members of the QAA Board.

### **QAA Chief Executive**

18. The Chief Executive of QAA is appointed by and is accountable to the Board. His/her role is to provide day-to-day leadership of QAA and its programmes of work, including the setting and achievement of corporate objectives in line with the Board's strategic direction. Much of this work involves liaison and consultation with external partners and stakeholders (for example, Government departments; civil servants; professional, statutory and regulatory bodies; funding bodies; institutions and their representative bodies; students and their representative bodies). The Chief Executive is responsible for:

- the overall organisation, management and staffing of QAA, including its corporate, financial, estate and personnel management
- the propriety and regularity of QAA's finances, and the efficient, effective and economical use of resources.

QAA has five executive Directors, each responsible for one of the five main organisational groups (Public Engagement; QAA Scotland; Research, Development and Partnerships; Resources; and Reviews). QAA has a staff of around 170 employees and a cadre of approximately 600 reviewers.

## **QAA activities**

### **Reviews of higher education providers**

19. QAA conducts evidence-based peer reviews of higher education providers and publishes reports detailing the findings, the stated purpose of which is to provide public assurance on academic standards, quality and the provision of public information. QAA carries out reviews using a variety of methods depending on the nation or the type of higher education provider. All QAA review methods for publicly funded higher education now have review teams that include a student member.

Separate review methods are used for:

- reviews of higher education providers
- reviews of higher education delivered in further education colleges
- educational oversight reviews for independent providers
- reviews of collaborative arrangements
- reviews of professional programmes
- reviews of transnational education.

### **Transnational education**

20. Many UK degree-awarding bodies offer some of their higher education programmes through partnership links with organisations outside the UK (see also Para.8: UK Context – Higher Education). The UK degree-awarding bodies are responsible for the academic standards of their awards, whether delivered within or outside the UK. QAA reviews the partnership arrangements between UK degree-awarding bodies and organisations in other countries to check that they are robust and that UK expectations are being met, and publishes reports on its findings.

For example, in late 2012, QAA undertook a transnational education (TNE) review in mainland China. This review was a pilot for a new QAA review method for TNE, on which QAA plans to publish a new review handbook in 2013.

### **UK Quality Code for Higher Education ('the Quality Code')**

21. QAA publishes a range of definitive reference points and guidance to support higher education providers in setting and maintaining academic standards, assuring quality and promoting quality enhancement. The central UK quality assurance reference point is the UK Quality Code for Higher Education. The Quality Code replaces the previous set of UK national reference points, known as the Academic Infrastructure, and has been introduced from the 2011-12 academic year onwards. The full Quality Code will come into force in August 2014. It sets out the expectations that all UK higher education providers across the different UK nations are required to meet. The Quality Code is set out in three Parts:

- Part A: Setting and maintaining threshold academic standards
- Part B: Assuring and enhancing academic quality
- Part C: Information about higher education provision.

The Quality Code underpins an approach whereby all providers of higher education in the UK will be quality assured under a common framework which can be adapted in its application in different UK countries, and which also recognises the value of enhancement.

Reviewers carrying out QAA reviews use the Quality Code as a benchmark for judging whether an individual higher education provider meets national expectations for academic standards and the quality of learning opportunities. The Quality Code is also intended to help higher education providers to set and

maintain the academic standards of their programmes and awards, to assure and enhance the quality of the learning opportunities they make available, and to provide information about higher education. Similarly the Quality Code is available to student representatives and students' unions for use in their discussions with their higher education provider, as it sets out the minimum expectations for the quality of the learning opportunities the provider makes available to its students.

### **Advice to Government on degree-awarding powers and university title**

22. QAA's Advisory Committee on Degree-Awarding Powers (ACDAP) considers applications initially and decides if they should proceed to detailed scrutiny. If ACDAP recommends that an application should proceed, QAA appoints a team to carry out a detailed scrutiny of the application and supporting evidence. Applications are considered against the relevant set of criteria determined by the four nations of the UK (England, Northern Ireland, Scotland, Wales) and are designed to establish that an applicant is a well-founded and self-critical academic community that can demonstrate firm guardianship of its standards. QAA's advice is also sought on applications for university title - the right to be called a university.

### **Working with students**

23. QAA works with students as partners in quality assurance, involving them in QAA governance. There are two student members of the QAA Board, plus 17 members of a QAA Student Advisory Board. There are also over 80 trained student reviewers now available to take part in QAA reviews. QAA works with students to develop QAA policy and the Quality Code. There are student members of the QAA Scotland Committee and QAA Wales Committee, and of the committees which manage and oversee the work of the Enhancement Themes.

### **Investigating concerns about higher education providers**

24. QAA investigates concerns about academic quality and standards where there is evidence of systemic and/or procedural weaknesses. Concerns can be raised with QAA by students, staff within higher education providers or other interested parties, either from within the UK or internationally.

### **Regulation of the Access to Higher Education Diploma**

25. Access to Higher Education (Access to HE) courses are designed for individuals who want to take a university-level course, but who did not gain the qualifications they needed while at school. Courses are available at colleges across England and Wales, in a wide range of subjects. Since its founding in 1997, QAA has been responsible for assuring the quality of recognised Access to HE courses.

### **Enhancement**

26. QAA seeks to support higher education providers in enhancing the quality of the education they provide, through the sharing of good practice and ideas. QAA offers advice and guidance to help UK higher education providers deliver the best possible student experience. Where there are areas of common interest, QAA works in partnership with the UK's Higher Education Academy, which champions excellent learning and teaching in higher education.

QAA review reports seek to identify features of good practice and QAA publishes overview reports on good practice findings and recommendations in its

*Outcomes* series. These are intended to represent a resource for quality managers and those who design academic programmes of study. In Scotland, enhancement has been fully integrated into the approach taken to quality assurance, through an enhancement-led review methodology and developmental framework. QAA also conducts research that is intended to be helpful to those responsible for quality. In 2012, a QAA research strategy was approved to provide a focus and framework for QAA to undertake research in support of the QAA Strategy 2011-14 and annual priorities.

QAA also seeks to cultivate debate and collaboration that supports improvement, by hosting events and publishing discussion papers such as the *Talking about quality* series, inviting feedback from all those interested in the quality of UK higher education - from students and parents to policymakers and senior academics.

### **Commercial activity**

27. QAA Enterprises is the commercial arm of QAA, specialising in quality improvement in higher and further education. QAA Enterprises delivers training, events and enhancement services to enable higher education providers and other stakeholders to benchmark, improve and manage their own quality assurance processes.

The Panel noted the care which was taken by both the Chief Executive and the Board to ensure that no conflicts of interest could arise from such activity.

### **UK higher education sector partnerships and leadership**

28. QAA consults and works with many different stakeholder groups with an interest in the quality of UK higher education. These include:

- students and the UK's National Union of Students
- Government bodies
- higher education funding bodies/councils
- other higher education sector agencies (such as the Higher Education Academy)
- higher education staff
- employers
- professional, statutory and regulatory bodies
- representative bodies for higher education.

QAA also seeks to take a leadership role within the higher education sector, working with departments of Government across the UK's four nations and other sector bodies. It is a member of a number of key leadership groups in the UK, as follows

- Higher Education Better Regulation Group (HEBRG)
- Professional, Statutory and Regulatory Bodies (PSRB) Forum (QAA coordinates this Forum with the UK Inter-Professional Group, UKIPG)
- Quality in Higher Education Group (QHEG)
- Regulatory Partnership Group (RPG)
- QAA Research Advisory Group
- Scottish Credit and Qualifications Framework (SCQF) Partnership
- Scottish Higher Education Enhancement Committee (SHEEC)
- Student Experience, Teaching and Quality Committee (SETQC)
- Student participation in quality Scotland (sparqs)
- Universities Quality Working Group (Scotland)



## **Internationalisation of the Agency**

29. QAA seeks to engage actively with European and wider international quality assurance developments. It is guided by its international strategy, which has three main goals:

- to secure academic standards in internationally delivered UK higher education or transnational education
- to be an authority on international quality assurance and enhancement matters, and to enhance the recognition of QAA as a provider of authoritative advice by sharing expertise, intelligence and information
- to maximise the influence of QAA in international quality assurance developments.

QAA was a founder member of the European Association for Quality Assurance in Higher Education (ENQA). Through its current ENQA membership, QAA demonstrates the compatibility of quality assurance arrangements in the UK with the Standards and Guidelines for Quality Assurance in the European Higher Education Area.

QAA is a member of the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) and participates in the Asia-Pacific Quality Network (APQN). QAA is also a member of the Council for Higher Education Accreditation (CHEA) International Quality Group, and participates in many fora and dialogues with international partners. In addition, QAA has links with partner agencies around the world through Memoranda of Understanding and of Cooperation.

- The Chief Executive of QAA is a member of the International Education Advisory Forum (IEAF), chaired by the UK's Minister of State for Universities and Science, and QAA is a stakeholder in the UK India Education and Research Initiative, and UK China Partners in Education cooperation programmes.
- QAA has close relationships with international quality assurance agencies, monitoring and reporting on advances around the world. QAA publishes a monthly newsletter, *Quality Update International*, which covers news and a selection of articles relating to higher education and quality assurance.

## Update on 2008 Review

30. In its 2008 report on QAA, the ENQA review team highlighted a number of areas for development. Below is a chart setting out progress made in key areas since 2008:

<b>2008 ENQA report</b>			
<b>ESG Standard and overall 2008 judgement</b>	<b>Issue</b>	<b>2008 Panel Recommendation</b>	<b>QAA follow up (as at May, 2013)</b>
<b>2.4 Processes fit for purpose (Fully compliant)</b>	<b>Inclusion of international reviewers in QAA review activity</b>	<p>.....QAA does not have a tradition of using international experts, largely because of perceived concerns about the scale of the review programme and the high level of detailed knowledge and understanding of the UK's higher education systems and their management arrangements needed to be an effective reviewer. The Panel heard that this position will probably change in the coming year, when revisions to the Scottish ELIR system will include an international expert in review teams. If this proves successful, it will probably be adopted elsewhere in the UK. The Panel notes that the inclusion of international experts in review activity is fully within the spirit of the European Standards and Guidelines and would urge QAA to move towards implementation as soon as practicable. (Para. 25)</p>	<p>QAA has piloted and evaluated the inclusion of international reviewers on its review teams across a full cycle of Enhancement-led Institutional Review (ELIR) in Scotland. International reviewers were introduced into the ELIR review methodology in 2008 and have been used in each institutional review of Scottish higher education providers in the 2008-12 cycle.</p> <p>QAA reports that the pilot has proved to be a very positive experience, bringing added depth and dynamism to the review teams. In December 2012, the QAA Board reviewed the evaluation of the pilot in Scotland and endorsed the inclusion of international reviewers in other QAA review methods in future across the UK, beginning with the new Higher Education Review method.</p>
<b>2.5 Reporting (Fully compliant)</b>	<b>More accessible public information for non-specialist audiences</b>	<p>The Panel believes that the current forms of reporting are meeting the public information requirement. However, there is a pervasive impression gained by the Panel both from the documentation which it has seen and from interviewees that the language used in formulating QAA judgements about individual institutions relied</p>	<p>In 2009 -10, QAA embarked on a new approach to public engagement. This approach has four key aims:</p> <ul style="list-style-type: none"> <li>• Improve public understanding of UK higher education quality</li> <li>• Reduce the clutter in QAA communications</li> <li>• Be visible and valued in public debate</li> <li>• Manage resources strategically</li> </ul> <p>These aims are now part of business planning and the QAA Strategy for 2011-14. Internal QAA teams have been restructured to merge</p>

		<p><i>heavily on terms more readily familiar to a specialist audience and may therefore sometimes require some further interpretation for the non-specialist. The Panel understands the requirement to maintain consistency of approach in reporting styles across the sector, but would endorse QAA's continuing review of its reporting style so as to deliver increased acuity of expression. (Para. 32)</i></p>	<p>responsibility for review reporting and all other communications into one group, the Public Engagement Group.</p> <p>Also, since 2008, a number of practical steps have been undertaken to enhance reporting:</p> <ul style="list-style-type: none"> <li>• Every higher education provider now has its own page on the QAA website, summarising key information and outcomes of recent reviews. Readers can access this summary information without having to download the full report.</li> <li>• Attempts have been made to make published QAA reports much more accessible. They are written in clearer English and include a glossary of terms to explain the more complex information to a non-technical (public) audience.</li> <li>• QAA releases its review judgements about each higher education provider to the media in the provider's local area.</li> <li>• In August 2012, QAA launched a QAA Quality Mark, which eligible higher education providers who have undergone a positive QAA review can display on their websites.</li> <li>• A new corporate website, <a href="http://www.qaa.ac.uk">www.qaa.ac.uk</a>, was launched in July 2011, designed to address more clearly the needs of public and student audiences.</li> </ul>
<p><b>3.6 Independence (Substantially compliant)</b></p>	<p><b>Development of a more detailed protocol detailing the relationship between QAA, the Funding Councils and their respective Boards, set within a longer planning horizon than at present</b></p>	<p><i>The Panel accepts that the QAA and its Board are structured in such a way as to secure operational independence from HEIs and Government in its day-to-day operations. Nevertheless the current funding model for QAA, which is based on annual subscriptions from HE institutions and on a system of annual contracts from the Funding Councils potentially, introduces an element of uncertainty into the underlying stability of QAA relating to 'autonomous responsibility for their operations'. Similarly the requirement for endorsement by the Funding Councils both of QAA's annual programme of work and of the principal elements of any revisions</i></p>	<p>QAA has service level agreements/contracts with Funding Councils in each of the four nations of the UK. It is now the practice for HEFCE (for example) to produce a letter by July 31 each year setting out its intentions for the longer term (for at least three years) within the current context of HE. The correspondence is intended to assist future QAA planning. In the context of governance, the QAA Board has established a Finance and Strategy Committee, and six-yearly financial forecasts and income generation targets have been set. This enables QAA to take a longer-term view when negotiating with the funding bodies, setting subscription levels and targeting opportunities for business development.</p>

		<p>to the review methodologies could also contribute to this potential uncertainty. The Panel believes that the funders could, with benefit, review these arrangements to introduce and document formally a longer operational and financial horizon. In reality the Panel does not believe that in the foreseeable future this will act as a major constraint on QAA and its activities, but the Panel advises the development of a more detailed protocol articulating the relationship between QAA and the Funding Councils and their respective Boards, set within a longer planning horizon than at present in order that full public confidence in the independence of QAA should be retained, in compliance with the spirit of the ENQA standard. (Para 57)</p>	
<p><b>3.7 External quality assurance criteria and processes used by the agencies (Substantially compliant)</b></p>	<p><b>Inclusion of a student member on review panels</b></p>	<p>The Panel has noted that QAA is not yet fully compliant with the expectations of the Standard relating to inclusion of a student member on external assessments. Whilst this procedure has for some time proved successful in Scotland, it has not yet been fully introduced in England, Wales and Northern Ireland. The Panel believes this development to be an entirely appropriate aspect of good practice. The Panel suggests that delaying the introduction of such aspects of good practice until the beginning of a new review cycle might unduly hinder the evolution of QAA and should be avoided, unless consistency of judgement about institutions is likely to be substantially compromised. (Para. 60)</p>	<p>Since the 2008 review, QAA has taken major steps to embrace student involvement in its external quality assurance processes. At the time of the last review, student reviewers had been successfully working in Scotland since 2003. This feature was fully introduced in England and Wales from the beginning of 2010. QAA reports that it was able to recruit the reviewers from a very strong field. It has worked to involve students as equal members of review teams across all of its new review methods, as they come into effect. There are now over 80 trained student reviewers available to take part in review activity. Feedback and available evaluation indicates that they are playing a full, and very valuable, role within the audit teams. This was fully endorsed in feedback to the current Panel from institutions, stakeholders and student reviewers themselves. QAA also supports students involved more generally in the review process. In 2011-12 it supported over 200 lead student representatives in institutions in their roles across all its review methods. Feedback to the current Panel suggested that this is</p>

			greatly valued by Student Unions and their student officers.
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31. The Panel's overall assessment is that QAA has responded fully and appropriately to all the recommendations contained in the 2008 ENQA report. QAA is to be **commended** for its broader approach to ensuring very active student engagement in all key aspects of its work.

## **QAA compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area**

### **ESG Part 2: European standards and guidelines for the external quality assurance of higher education**

#### **ESG 2.1 Use of internal quality assurance procedures (ENQA Criterion 1)**

##### **Standard:**

External quality assurance procedures should take into account the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines.

##### **Guidelines:**

The standards for internal quality assurance contained in Part 1 provide a valuable basis for the external quality assessment process. It is important that the institutions' own internal policies and procedures are carefully evaluated in the course of external procedures, to determine the extent to which the standards are being met. If higher education institutions are to be able to demonstrate the effectiveness of their own internal quality assurance processes, and if those processes properly assure quality and standards, then external processes might be less intensive than otherwise.

### **QAA compliance**

32. The Panel has confirmed that the starting point for QAA's institutional review processes is based firmly on the institutions' self-evaluations of their own processes. The Panel has examined and explored QAA's institutional review processes as set out in its country-specific review handbooks and confirms from individual examples, that these are effective in testing and challenging institutions' internal quality assurance policies and their procedures for managing quality and standards.

The reference points used by QAA teams in assessing self-evaluations are contained in the elements of the Quality Code, which itself is compatible with section 1 of the ESG. The Panel was provided with a summary table showing the relationship between the ESG Part 1 and the Quality Code and explored this further during discussion. The Quality Code, and the corresponding headings under which reviewers are expected to report, address all of the standards set out in Part 1 of the ESG.

The Panel therefore confirms that the external quality assurance procedures that QAA uses, take into account fully the effectiveness of the internal processes described in Part 1 of the ESG.

#### **Panel judgement:**

Fully compliant.

#### **Panel Recommendations**

None.

## **ESG 2.2 Development of external quality assurance processes**

(ENQA Criterion 1 cont.)

### **Standard:**

The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions) and should be published with a description of the procedures to be used.

### **Guidelines:**

In order to ensure clarity of purpose and transparency of procedures, external quality assurance methods should be designed and developed through a process involving key stakeholders, including higher education institutions. The procedures that are finally agreed should be published and should contain explicit statements of the aims and objectives of the processes as well as a description of the procedures to be used.

As external quality assurance makes demands on the institutions involved, a preliminary impact assessment should be undertaken to ensure that the procedures to be adopted are appropriate and do not interfere more than necessary with the normal work of higher education institutions.

## **QAA compliance**

33. The Panel confirmed that common principles are followed for the development of all QAA's review methods, although there can be differences in how the different methods are operationalised across the four nations. In developing its institutional review processes, QAA first discusses the purposes of the reviews with key stakeholders and, when consensus is reached, produces a draft handbook and a draft operational description. These are consulted upon with all stakeholders, including all institutions, and the handbook, containing the details of the processes, is published in advance of any reviews taking place. This work is later reinforced by briefing meetings for institutional representatives and through a preparatory meeting at each institution.

34. This general approach is illustrated in the development of the UK Quality Code for Higher Education. In 2009-10, a consultation took place on the UK's existing Academic Infrastructure (a set of UK-wide reference points for assuring standards and quality in higher education). This resulted in a decision to restructure the content into a UK Quality Code for Higher Education in three Parts: (Part A: Setting and maintaining threshold academic standards; Part B: Assuring and enhancing academic quality; Part C: Information about higher education provision), subdivided into Chapters, some of which would be entirely new. QAA created a detailed protocol for the development of the Quality Code. The protocol was published on the QAA website and a Quality Code Steering Group was formed to oversee its development. The development of each Chapter or Part of the Quality Code is supported by an advisory group of practitioners and students who are experts on that particular subject, including one representative with expertise in European and international developments in higher education. The work of the advisory groups in preparing each Chapter or Part of the Quality Code is supported by a public consultation with the higher education sector and other stakeholders with an interest in higher education.

35. In regard to the involvement of other stakeholders, the participation of students in review processes is now well embedded. QAA also works closely with the professional, statutory and regulatory bodies (PSRBs). The Panel was impressed by the extent to which PSRBs reference their procedures to QAA's instruments, most notably the Quality Code and its predecessor publication. However in regard to the role of civil society more generally in relation to quality assurance and enhancement, the Panel would observe that there is scope for the further expansion of the role of business, industry, and, as appropriate, of representatives of specific spheres of society, e.g. the arts. QAA should consider the development of a strategy which takes account more directly of the needs of this stakeholder constituency. The Panel noted the priority given by the Chief Executive to the further development of both the public and employer engagement strategies in the current planning period.

As for the development of the 'risk-based approach to quality assurance', the Panel considers the process undertaken by QAA for the purpose of developing a substantial and operational concept to be a robust one. Since this concept is still under scrutiny and not fully ready for implementation yet, the Panel cannot and should not judge on its content and viability, based on the information available by early May 2013.

**Panel judgement:**

Fully compliant.

**Panel Recommendations**

- QAA should consider the development of a strategy which takes account more directly of the needs as stakeholders of business and industry at both Board and operational level. Additional input could be sought from this constituency in both review method planning and development and also in its subsequent operation.
- The 'risk-based approach to quality assurance' should be developed further (as already planned by QAA), bearing in mind the need to ensure conceptual clarity and procedural fitness for coherent implementation.



**ESG 2.3 Criteria for decisions  
(ENQA Criterion 1 cont.)**

**Standard:**

Any formal decisions made as a result of an external quality assurance activity should be based on explicit published criteria that are applied consistently.

**Guidelines:**

Formal decisions made by quality assurance agencies have a significant impact on the institutions and programmes that are judged. In the interests of equity and reliability, decisions should be based on published criteria and interpreted in a consistent manner. Conclusions should be based on recorded evidence and agencies should have in place ways of moderating conclusions, if necessary.

**QAA compliance**

36. All QAA review methodologies are developed in consultation with the higher education sector (as described under Standard 2.2). QAA's criteria for its decision-making procedures are all widely published in its handbooks and in other operational documents. These criteria, in the wider sense of the term, are expressed as 'expectations', all of which are to be met, and which are – to various extents – underpinned by sets of 'indicators', some of which are specified by sets of sub-indicators. The Panel found the 'expectations' and, in general, the indicators provided to be clearly and unambiguously expressed, explicit and consistent overall. The criteria used in reviews for judgements are based on the 'expectations' contained in the Quality Code, and are well-founded. All review method handbooks are available on the QAA website and contain information on the review process itself, as well as on the judgements and on the expectations that must be fulfilled in order to achieve positive judgements. The methodologies set out in the handbooks are reinforced in several ways. Institutions under review are invited to attend briefings or preparatory workshops and briefing material is available on line.

37. As regards consistency of decision making, reviewers, including student members of the team, attend a training programme which takes them through the review method before they are allowed to act as a reviewer. A QAA officer or contracted experienced review coordinator is involved throughout the review process itself and works with the review team on the final day of the review to ensure that judgements and outcomes of the review are evidence-based and sound. Judgements and outcomes are subject to scrutiny through an internal moderation process to ensure consistency of judgements. All report drafts are required to include references to the sources of the supporting evidence for analyses and judgements. The report is then drafted or edited by the QAA officer. All such QAA officers have attended reviewer training and observed/shadowed a more experienced officer, before carrying out their first review. The Panel agreed that review teams are well trained for their role through a well structured training process.

The Quality Code, which is the substantive framework both for assessing the fitness of higher education institutions to provide their services adequately and also to stimulate further improvement, provides extensive sets and sub-sets of quality indicators. The ambitious comprehensiveness of the Quality Code, and possibly the potential for its misinterpretation as being overly prescriptive, could pose the risk that it may not be consistently applied throughout the considerable range of QAA review processes, or that it might unduly hamper institutional autonomy. However, in view of the aforementioned robust procedural safeguards and institutional provisions, the Panel is confident that QAA is able to avoid these risks, especially by ensuring the high-quality training of its reviewers in the application of the Quality Code and by ensuring the effective oversight of review processes by experienced QAA personnel.

**Panel judgement:**

Fully compliant.

**Panel Recommendations**

- The Panel recognises that QAA currently ensures that a balance is maintained between the need formally to articulate detailed indicators of sound practice in the Quality Code, and the need also to allow for some flexibility of judgement in the review process itself, while still safeguarding the overall coherence of judgements. The Panel endorses the continuation of this approach, which can, in the Panel's view, continue to be achieved through QAA's commendable practices of both training reviewers thoroughly and also providing professional guidance throughout the review process. The Panel recommends that a continuing commitment to this balanced approach will be essential for the successful implementation of both the Quality Code and the planned risk-based approach to quality assurance.

**ESG 2.4 Processes fit for purpose  
(ENQA Criterion 1 cont.)****Standard:**

All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them.

**Guidelines:**

Quality assurance agencies within the EHEA undertake different external processes for different purposes and in different ways. It is of the first importance that agencies should operate procedures which are fit for their own defined and published purposes. Experience has shown, however, that there are some widely-used elements of external review processes which not only help to ensure their validity, reliability and usefulness, but also provide a basis for the European dimension to quality assurance.

Amongst these elements the following are particularly noteworthy:

- insistence that the experts undertaking the external quality assurance activity have appropriate skills and are competent to perform their task
- the exercise of care in the selection of experts
- the provision of appropriate briefing or training for experts
- the use of international experts
- participation of students
- ensuring that the review procedures used are sufficient to provide adequate evidence to support the findings and conclusions reached
- the use of the self-evaluation/site visit/draft report/published report/follow-up model of review
- recognition of the importance of institutional improvement and enhancement policies as a fundamental element in the assurance of quality.

**QAA compliance**

38. QAA states that the purpose of its external review processes is to provide public assurance about the standards of higher education awards and the quality of the learning opportunities in place to enable students to achieve those awards, and that processes should not be unduly onerous, but should be sufficient to secure the purpose. The Panel has examined the key elements of the processes operated by QAA. The Panel was told and accepts that QAA bases its processes on the 'fitness for purpose' principle. As a result it uses different procedures for the various review processes that it undertakes. While each of the review types has a different emphasis (and in some cases QAA tries to align its operations where there is involvement of Professional, Statutory and Regulatory Bodies), the Panel accepts that all have a fundamental function: to examine the institutions' internal quality assurance policies and processes and to assess and report publicly on the level of confidence that can be placed in them. Additionally, the opportunity is taken to recommend ways in which improvements might be made to the institutional management of standards and quality. Debate about standards at a national level has also broadened the remit of QAA in relation to the scope and reach of its overall processes, including for example the initiation of a new supplementary process, designed to achieve when necessary a prompt response to standards issues arising in individual institutions (see *Investigating concerns about higher education providers* (Para. 24).

39. QAA's review processes are based on peer review - for a typical (IRENI) visit, a team of four peer reviewers (including a student reviewer), supported by a QAA officer, visits the higher education provider for up to five days. Reviewers ('experts') are nominated by their home institutions and selected, according to specific criteria, through a paper-based exercise. Student reviewers may also be nominated by their respective Students' Union. Although reviewers are nominated by institutions, they are selected by the QAA in an independent, extensive, criterion-based process, in which nominees are matched against the criteria. QAA's Single Equality Scheme and the selection criteria together ensure that there is no discrimination.

40. All selected reviewers must complete a training programme which takes them through a simulated review and mirrors all the activities undertaken in an actual review. If a reviewer is unable to complete the training, s/he will not be allocated to a review. Students are full members of review teams and are expected to complete the same training as other reviewers; they are also provided with an additional day of contextual briefing. Review teams are usually trained together to assist in team building before the review begins.

The purpose of reviewer training is to ensure that all review team members:

- Understand the aims and objectives of the review process
- Have a thorough knowledge of the quality assurance system and the key reference points for the review process
- Understand their roles and tasks and the importance of team working
- Understand QAA's expectations of them as reviewers and the rules of conduct governing the review process
- Have the opportunity to explore the techniques and skills required to be an effective review team member

A new performance management (of reviewers) process is being implemented, through which the performance of reviewers and the QAA officer or contracted review coordinator is evaluated by review team members, the officer and the provider under review. Feedback is then given to the review team and the QAA officer who coordinated the review. These evaluations help to confirm that the review method is fit for purpose and meets its specified aims. In addition, in late 2012, the first survey of reviewer opinion was conducted by QAA, carried out by an independent consultant.

The Panel was impressed by the procedures for the careful selection of reviewers against published criteria, and the quality of training given to them.

Since its 2008 review by ENQA, as reported in Para. 30 above, QAA has piloted and evaluated the inclusion of international reviewers on its review teams across a full cycle of Enhancement-led Institutional Reviews (ELIR) in Scotland (2008-12). In December 2012, the QAA Board reviewed the evaluation of the pilot in Scotland and endorsed the inclusion of international reviewers in other QAA review methods in future, where they can add real value in a meaningful way. This would begin with the new Higher Education Review method.

The Panel would urge the early implementation of the automatic inclusion of an international reviewer in all its institutional review programmes across the UK as a standard feature.

41. QAA's review methodologies follow the four-stage model:

- self-evaluation (including a student written submission)
- peer review (including students)
- site visit (including preparatory/briefing stages as well as the main review visit)
- published report (including the provider's action plan).

Since QAA's last ENQA review in 2008, all institutions, regardless of the outcome of their review, are now required to develop and publish an action plan, or to submit a follow-up report that addresses all recommendations and features of good practice highlighted in the report. This action plan is developed in consultation with the student body and contains a link to the QAA report.

From the examples it has reviewed, the Panel believes that this system is operating very effectively.

42. Student involvement in reviews has been greatly enhanced since the 2008 report. Student reviewers have been recruited and trained and are now routinely included in review team membership as full members. QAA has developed student-specific guidance documents and web resources for all relevant review methods. In methods where it is appropriate and feasible, students in institutions under review submit a student written submission to sit alongside the provider's self-evaluation document. The role of institutional facilitator is also now mirrored by a lead student representative. Both of these initiatives are intended to ensure that the student voice is heard clearly throughout the review and to enhance students' opportunities to be involved in external quality assurance processes. In Scotland, rather than produce a separate student written submission, students are directly involved in the development of the institution's self-evaluation document. Direct student input at the self-evaluation stage will be included in the handbook for the new method of Higher Education Review, which is currently under consultation. Reflecting the number of review methodologies carried out by QAA, the Agency is currently working on a set of common principles for student participation in external quality assurance. QAA is now undertaking development work to see how its student engagement can be extended and deepened.

In Wales, QAA is a partner in the Welsh Future Directions programme looking at quality enhancement themes, and is represented on the Students as Partners work stream. QAA is also a partner in the Wales Initiative for Student Engagement (WISE). In Scotland, student engagement is a central part of the Scottish Quality Enhancement Framework. QAA Scotland has included student reviewers as full members of all institutional review teams since 2003. In order to support student representatives in colleges and universities, a development body known as sparqs (student participation in quality Scotland) was created in 2003. QAA Scotland was a founding member of the sparqs partnership and is represented on its management committee.

Students interviewed by the Panel confirmed the strength of QAA's student engagement strategy and welcomed in particular the support given to student representatives at institutional level, especially in smaller institutions where the student representative bodies were not necessarily that strong in resources or size.

43. Enhancement is recognised by QAA as a key element of its review methodologies. In Scotland, 10 years of work on Enhancement Themes is currently being celebrated. In England, Northern Ireland and Wales there is now

a formal judgement in this area, and a thematic element has been introduced to the review method in England and Northern Ireland in order to facilitate system-wide analysis on certain topics each year. In 2010, enhancement themes were introduced in Wales as part of the framework to enhance the student experience. In Scotland, there is a searchable database linked to the work on enhancement themes. A similar facility is currently being populated for the UK as a whole. Good practice is shared through a series of good practice papers and sector-wide overview reports. Thematic briefings are provided in publication series such as *Quality Matters*, *Outcomes from Institutional Audit*, *Outcomes from Collaborative Provision Audit*, and *Enhancement Themes* papers.

The Panel reviewed progress on the setting up of an open searchable database of features of good practice and the recommendations highlighted in reports accessible to institutions. The Panel is highly supportive of this development work.

**Panel judgement:**

Fully compliant.

**Panel Recommendations:**

- The Panel would commend QAA's training programme for Reviewers as a feature of good practice
- The Panel would commend QAA's model for student engagement as a feature of good practice
- Following agreement in principle by the QAA Board, the Panel would urge the early implementation of the inclusion of an international reviewer (from outside the UK) in all its institutional review programmes across the UK as a standard feature. In the Panel's view, this will bring added depth, experience, insight and added value both to QAA's review activities and to institutional quality enhancement capacity, by providing a wholly unbiased system-wide view on operations, unfettered by traditions.
- QAA should continue its efforts to position its operations, where possible and appropriate, with quality criteria and procedures determined by professional, statutory and regulatory bodies (PSRBs) responsible for accreditation.

**ESG 2.5 Reporting  
(ENQA Criterion 1 cont.)**

**Standard:**

Reports should be published and should be written in a style which is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find.

**Guidelines:**

In order to ensure maximum benefit from external quality assurance processes, it is important that reports should meet the identified needs of the intended readership. Reports are sometimes intended for different readership groups and this will require careful attention to structure, content, style and tone.

In general, reports should be structured to cover description, analysis (including relevant evidence), conclusions, commendations, and recommendations.

There should be sufficient preliminary explanation to enable a lay reader to understand the purposes of the review, its form, and the criteria used in making decisions. Key findings, conclusions and recommendations should be easily locatable by readers.

Reports should be published in a readily accessible form and there should be opportunities for readers and users of the reports (both within the relevant institution and outside it) to comment on their usefulness.

**QAA compliance**

44. All QAA review reports (apart from those for the degree-awarding powers process) are published on its website. Review reports all include description and analysis, judgements (the format of which depends on the methodology used), features of good practice and recommendations for improvement. These key findings are also highlighted in the way the report is presented on the website. Over the last five years, much work has been carried out to ensure that reports and outcomes of reviews are written in clear and accessible language to meet the needs of a wide range of audiences. Further development of its communication and broader public engagement strategies remain key priority areas for QAA.

Efforts have been made by QAA over the last two years to develop a clearer style of reporting. The public report for each QAA review is now shorter and written in more direct language. QAA staff have been trained to write clearly and to move away from the rather opaque reporting style of the past. An analysis of improved readability in QAA documents was carried out in 2012 and there are plans to carry out some further analysis over the coming year, beginning with work by the Student Engagement Team with the QAA Student Advisory Board.

45. A review of QAA's communication unit has been undertaken since the last ENQA review; the result was the creation of a Public Engagement Group, within which there is a Multimedia Team. Members of the Multimedia Team work with QAA officers to ensure that reports are clear and transparent. Guides are published to help students, both UK and international, in their understanding of what QAA does and how they can become involved. QAA has a dedicated Student Engagement Team which is responsible for all aspects of student involvement in external quality assurance. Guidance is also issued for higher education providers, along with online briefings for reviews. Facilitators and lead student representatives for providers are invited to attend face-to-face briefing sessions.

Reports for Welsh higher education providers, as well as other documentation

and correspondence, are available in Welsh, in accordance with QAA's Welsh Language Scheme. Since its last review, QAA has published a glossary of commonly used quality assurance and enhancement terms.

46. QAA has begun a programme of work on the use of multimedia, particularly social media, to reach the wider public is a feature of good practice; it has an established and well accessed presence on social media channels: postings on Twitter, films and animations on YouTube, and photos on Flickr. Similarly, QAA is building its social media portfolio to engage audiences, most recently on blogs, Facebook, Storify and ScoopIt. It uses films and podcasts on its website, as additional channels to reach its different audiences. It continues to build relationships with, and link to and from, high-traffic websites and media outlets used by higher education applicants, current students and other public audiences (such as the UK Unistats and UCAS websites).

The Panel noted the priority given by the Chief Executive to the further development of both the public and employer engagement strategies in the current planning period.

**Panel judgement:**

Fully compliant.

**Panel Recommendations**

- The Panel would commend, as a feature of good practice, QAA's imaginative use of multimedia/social media as tools for public engagement and would support plans to expand this area of communication.



**ESG 2.6 Follow up-procedures  
(ENQA Criterion 1 cont.)**

**Standard:**

Quality assurance processes which contain recommendations for action or which require a subsequent action plan, should have a predetermined follow-up procedure which is implemented consistently.

**Guidelines:**

Quality assurance is not principally about individual external scrutiny events: it should be about continuously trying to do a better job. External quality assurance does not end with the publication of the report and should include a structured follow-up procedure to ensure that recommendations are dealt with appropriately and any required action plans drawn up and implemented. This may involve further meetings with institutional or programme representatives. The objective is to ensure that areas identified for improvement are dealt with speedily and that further enhancement is encouraged.

**QAA compliance**

47. All QAA reports clearly state the outcomes of each review (judgements) and highlight features of good practice and recommendations. Depending on the review method, the recommendations may be described as 'essential', 'advisable' or 'desirable', or they may have a timeframe indicating the urgency attached to them. All higher education providers are required to produce an action plan or follow-up report setting out their planned action against each of the recommendations, and also how they propose to build on the features of good practice. The action plan is monitored by QAA; the level and frequency of monitoring will depend on the outcome of the review. A review is 'signed off' on publication of the action plan (if the outcome was positive), or at a point during the monitoring of the action plan when it is clear that the matters raised by the review team have been satisfactorily dealt with. In this latter case, the original review team is involved in the judgement process. At the stage of a positive outcome, the higher education provider may use the QAA Quality Mark on its website to indicate that it has met UK expectations.

The Panel has reviewed the effectiveness of the monitoring of the action plans and has discussed it with external representatives; it believes that QAA's monitoring is effectively carried out.

**Panel judgement:**

Fully compliant.

**Panel Recommendations**

None

**ESG 2.7 Periodic reviews  
(ENQA Criterion 1 cont.)**

**Standard:**

External quality assurance of institutions and/or programmes should be undertaken on a cyclical basis. The length of the cycle and the review procedures to be used should be clearly defined and published in advance.

**Guidelines:**

Quality assurance is not a static but a dynamic process. It should be continuous and not 'once in a lifetime'. It does not end with the first review or with the completion of the formal follow-up procedure. It has to be periodically renewed. Subsequent external reviews should take into account progress that has been made since the previous event. The process to be used in all external reviews should be clearly defined by the external quality assurance agency and its demands on institutions should not be greater than are necessary for the achievement of its objectives.

**QAA compliance**

49. The Panel notes that the differing cycle lengths in the review processes throughout the UK are largely a result of historical circumstances relating to the development of the UK's quality assurance processes. With a European move to greater institutional ownership of quality and standards, the frequency of external inspection becomes a less critical factor. QAA review methods are normally based on a cycle of between four and six years. As a more risk-based approach to quality assurance is embedded, a series of triggers is being developed. The Panel was told that a key feature of the current consultation about the risk based approach, was that risk increasingly is to be reflected in the length of cycle applied to each provider, but not in the intensity of engagement with the review process itself.

For example, in Wales, the review cycle is based on six years maximum, with the outcomes of a review determining when the next one will be - this could be in two, four or six years. The ELIR review method in Scotland now includes a process of annual monitoring, as does the educational oversight method where the outcome of the monitoring process is one of the factors that determine when the next review will take place. Regardless of the method, the length of cycle and the type of follow-up reporting required, all review methods scrutinise the internal quality assurance mechanisms used to assure the provider of its own standards and quality. In all cases, the relevant handbook for the review method clearly sets out the cycle and the follow-up arrangements.

50. The new review process of *Higher Education Review* being introduced for England and Northern Ireland from the 2013-14 academic year onward, will include a six-year review cycle for those higher education providers with a longer track record of successfully assuring quality and standards, and a four-year review cycle for those providers with a shorter track record. At the time of writing, further consultation with the sector on the proposed new review method has just closed. The Panel acknowledged the careful thought being given by QAA to the design and implementation of this process. The Panel noted that careful, evidenced judgements would need to be made about individual institutions and their record of engagement with quality assurance activity, and which would not

compromise the public perception of individual institutions. 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.

**Panel judgement:**

Fully compliant.

**Panel Recommendations**

- That QAA should continue to exercise extreme care in the introduction of the new review process of *Higher Education Review* in England and Northern Ireland. In particular the criteria for the definition of risk and for differentiating procedural consequences would need to be robust in substance, viable for coherent implementation, and transparent to the institutions concerned and to the general public.

### **ESG 2.8 System-wide analysis (ENQA Criterion 1 cont.)**

#### **Standard:**

Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations, assessments, etc.

#### **Guidelines:**

All external quality assurance agencies collect a wealth of information about individual programmes and/or institutions and this provides material for structured analyses across whole higher education systems. Such analyses can provide very useful information about developments, trends, emerging good practice and areas of persistent difficulty or weakness and can become useful tools for policy development and quality enhancement. Agencies should consider including a research and development function within their activities, to help them extract maximum benefit from their work.

### **QAA compliance**

51. QAA's has adopted a research strategy which is designed:

- to inform policy making (at national and institutional levels)
- to provide an analysis of current trends in higher education (and their social and economic consequences)
- to enhance practice and the student experience in higher education (and the learning gain resulting from the experience)

The research and development function of QAA resides primarily within its Research, Development and Partnerships Group, which has responsibility for analysing and disseminating the general findings from reviews, in different formats appropriate to a range of audiences, including the general public.

QAA publishes a large number of analytical reports relating to the generic, sector-wide aspects of its reviews. The outputs from this activity include:

- *Outcomes and Learning from...* papers (based on review findings)
- *Talking about quality* papers (opinion pieces)
- the *Good Practice Knowledgebase* (a searchable database on the QAA website, organised around the learner journey and mapped to the Quality Code)
- the *Recommendations Knowledgebase* (a searchable database on the QAA website, organised around the Chapters of the Quality Code)
- the *Higher Education Empirical Research* (HEER) database (summaries of higher education reports and journal articles, for practitioners, managers, quality professionals, researchers and policy makers in higher education).
- through QAA Scotland, a distinctive range of research and development activities for the higher education sector in Scotland, for example through analysis of ELIR reviews and management of Enhancement Themes. (Key deliverables include a searchable database of theme-related resources, annual overview reports commissioned by the Scottish Funding Council, and development work to support the work of institutional quality managers across the Scottish higher education sector).

52. QAA operates a QAA Liaison Scheme. This scheme provides a relationship between QAA and quality officers within QAA's subscribing higher education

providers, to promote enhancement activities and raise QAA's awareness of issues that affect the higher education community. The scheme provides the sector with a further opportunity to comment on the development and implementation of QAA policies and projects, such as the Quality Code. The scheme also helps to raise awareness among QAA staff of the challenges and issues facing higher education providers. The Liaison Scheme does not operate in Scotland, where annual discussion meetings are held with higher education providers as part of the Scottish review method.

The Panel has been impressed by the quantity and quality of analyses and widely-disseminated reports produced by QAA and by the significant resource which they represent for the sector in supporting quality enhancement. This is an area of particular strength.

**Panel judgement:**

Fully compliant.

**Panel Recommendations**

- The Panel would strongly commend, as a feature of good practice, QAA's substantial level of activity in system-wide analysis and its dissemination across the sector.

## **ESG Part 3: European standards and guidelines for external quality assurance agencies**

### **ESG 3.1 Use of external quality assurance procedures for higher education (ENQA Criterion 1 cont.)**

#### **Standard:**

The external quality assurance of agencies should take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the European Standards and Guidelines.

#### **Guidelines:**

The standards for external quality assurance contained in Part 2 provide a valuable basis for the external quality assessment process. The standards reflect best practices and experiences gained through the development of external quality assurance in Europe since the early 1990s. It is therefore important that these standards are integrated into the processes applied by external quality assurance agencies towards the higher education institutions. The standards for external quality assurance should together with the standards for external quality assurance agencies constitute the basis for professional and credible external quality assurance of higher education institutions.

### **QAA compliance**

53. QAA's quality assurance procedures, processes and guidelines, including the Quality Code, take the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) fully into account, as described in the previous section. The ESG is integrated into the processes QAA applies in its external quality assurance of higher education institutions, ensuring that they are robust, credible and professional.

The Panel confirms that, as described in the previous section, QAA's processes and procedures are based on, and are compliant with, Part 2 of the ESG.

#### **Panel judgement:**

Fully compliant.

#### **Panel Recommendations**

None.

### **ESG 3.2 Official status (ENQA Criterion 2)**

**Standard:** Agencies should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.

### **QAA compliance**

54. QAA is the agency responsible for the external quality assurance of higher education in the UK. Its role is recognised by all Governments of the four UK nations, by the Funding Councils and by representative bodies. QAA complies with all relevant legal and regulatory requirements governing its operations as a UK registered company and charity.

55. The UK's higher education Funding Councils contract with QAA to provide quality assurance of the education in the institutions they fund, in discharge of their statutory obligations under the 1992 Further and Higher Education Act. The Governments also commission QAA to advise them on applications for the granting of degree-awarding powers and university title. QAA is also contracted by relevant competent bodies to undertake a range of other activities.

56. QAA's formal status is that of a company limited by guarantee and a charity registered in England and separately in Scotland. It depends for its income largely on subscriptions from HEIs and the renewal of annual contracts with its principal stakeholders. The members of the company are UUK, Universities Scotland, HEW, and GuildHE. QAA operates according to national and country-specific UK law, as appropriate. QAA's Memorandum of Association states its objectives as follows:

- the promotion and maintenance of quality and standards in higher education in the UK and elsewhere
- the enhancement of teaching and learning, and the identification and promotion of innovation and good practice in teaching and learning
- the provision of information and the publication of reports on quality and standards in higher education in the UK and elsewhere
- the provision of advice to Governments, as requested, on access course recognition and in relation to all or any of the above objects.

Since it was founded in 1997, QAA has provided continuous, external quality assurance for higher education and has responded to a growing remit in a rapidly changing external environment.

The Panel fully accepts that QAA is recognised by the UK central and devolved Governments as the national agency with prime responsibility for external quality assurance in higher education. The current governance structure embracing QAA reflects the responsibilities of central Government for securing

quality and standards in the educational provision it funds; it brokers effective linkage to HEIs as autonomous self governing institutions; and it facilitates their involvement in a national scheme of quality assurance and the process of continuous quality enhancement based on review by peers.

**Panel judgement:**

Fully compliant.

**Panel Recommendations**

None.



**ESG 3.3 Activities  
(ENQA Criterion 1 cont.)**

**Standard:**

Agencies should undertake external quality assurance activities (at institutional or programme level) on a regular basis.

**Guidelines:**

These may involve evaluation, review, audit, assessment, accreditation or other similar activities and should be part of the core functions of the agency.

**QAA compliance**

57. As described in Para. 19, QAA's activities cover all aspects of the external quality assurance and quality enhancement of UK higher education at institutional level for each of the four nations. It also undertakes reviews of publicly-funded higher education in further education colleges on a regular basis. (Scrutiny for degree-awarding powers is specific to each individual application and, therefore, not repeated on a regular basis). All review activities are undertaken on a regular and continuous basis. Reviews are planned and scheduled in accordance with the relevant methodology and take into account new review methods or activities as QAA's remit expands (for example, new providers entering the sector; expansion of UK offshore activities in higher education).

The Quality Code and external quality assurance activities form the core of QAA's functions. Although QAA's review activities are at provider level, the Agency also produces supplementary guidance and reference points, notably subject benchmark statements, to support providers at programme level.

**Panel judgement:**

Fully compliant.

**Panel Recommendations**

None.

**ESG 3.4 Resources**

(ENQA Criterion 3)

**Standard:**

Agencies should have adequate and proportionate resources, both human and financial, to enable them to organise and run their external quality assurance process (es) in an effective and efficient manner, with appropriate provision for the development of their processes and procedures (*and staff*) (*Addition by ENQA for ENQA criterion*)

**QAA compliance**

58. QAA is largely funded from subscriptions from higher education providers and through contracts with the UK higher education funding bodies. In recent years, however, QAA has widened its subscriber base to include voluntary private and further education college subscribers, and has contracted to undertake reviews for a large number of non-publicly funded institutions. QAA has also pursued other sources of income. It has established a trading subsidiary, QAA Enterprises, and an Innovation and Development Fund to develop new products and services for the benefit of UK higher education.

59. The QAA Board has established a Finance and Strategy Committee, which oversees QAA's planning process (linked to its Strategy 2011-14), confirms its Planning Framework (published on the QAA website) and sets and monitors six-yearly financial forecasts and income generation targets. This enables QAA to take a longer-term view when negotiating with the funding bodies, setting subscription levels, and targeting opportunities for business development. QAA's total income for 2011-12 was £14.03 million, and reserves amounted to £4.49 million. In 2012, QAA introduced a dedicated procurement and contract management function in order to ensure that it achieves maximum value for money (VfM).

60. During 2010-11, QAA undertook a review of its organisational structure and adopted a number of changes to ensure that it has sufficient resources to continue to respond flexibly and swiftly to changing and emerging requirements. The current operational groupings are:

- Public Engagement Group
- The Reviews Group
- The Research, Development and Partnerships Group
- QAA Scotland
- Resources Group

QAA's Resources Group has responsibility for the effective management of all resources, including:

- finance and planning
- corporate and legal affairs
- business development
- information management and infrastructure
- human resources and organisational development.

61. QAA has around 170 staff drawn from the higher education sector, from other professional backgrounds, and from a range of national and international

contexts. QAA has around 600 reviewers who are selected from a pool both in the UK and internationally. QAA has made details of current reviewers available (with their permission) on its website. A searchable database gives key information about reviewers. The inclusion of international reviewers in QAA institutional review programmes (discussed in Para. 40) would carry some modest financial consequences, which will need to be factored in to QAA's forward financial planning.

62. QAA has a strong commitment to staff development, and invests in staff training and development at all levels of the organisation. All internal staff have a comprehensive induction programme when they join the Agency and are supported by a mentor from outside their own group. Members of staff are able undertake relevant academic, vocational or professional qualifications with the support of QAA, and are encouraged to be involved in at least one cross-agency activity. In addition, QAA holds regular staff information talks covering a wide range of topics (including presentations from other European quality assurance agencies) and these are open to all employees. The Panel heard that the mentoring scheme was particularly valued by employees. Performance management is an integral part of QAA processes, both informally through feedback and formally through annual performance reviews for staff. The QAA performance review process provides an opportunity for staff and their managers to reflect on past performance, to agree targets and objectives, and to identify training and development needs for the coming year. In meetings with the Panel, staff reported that they felt well-supported and well-prepared for their tasks. The Panel was impressed by the way in which staff workloads are managed, which delivered flexibility in dealing with peak loads across the organisation.

63. QAA asks reviewers, officers and higher education providers for feedback on the performance of reviewers during review. Following the 2012 QAA Reviewer Survey, QAA has proposed a more targeted system, where reviewers reflect on their own performance during review and provide feedback on the other members of their review team. QAA is now revising the proposals with a view to implementing the new system by the beginning of 2013-14.

64. QAA has offices in four cities in the UK to support its activities. Gloucester (England) is the main base, with a dedicated office for QAA Scotland in Glasgow, and smaller bases in Cardiff (Wales) and London.

65. QAA has dedicated independent information technology systems to support external quality assurance. It supports and maintains an Agency-wide operational database (QMIS) used to manage reviews, projects and events, and has invested in upgrading its reviewer extranet (Qmmunity) to enable reviewers and staff to easily access documents wherever they are working (including overseas) and for QAA to more easily gather and analyse data.

66. QAA has been certified for compliance with ISO/IEC 27001, the international standard which sets out the requirements for an information security management system. QAA conducts regular information security audits. The QAA website aims to meet the recommended standard of the World Wide Web Consortium in regard to accessibility guidelines. The website also aims to be accessible to assistive technologies and flexible for all users.

67. The Panel concurs in the view that QAA has appropriate and proportionate resources to support all its current operations. The Panel can confirm QAA's commitment to the ongoing personal and professional development of its staff and reviewers, which are key resources.

**Panel judgement:**

Fully compliant.

**Panel Recommendations**

- That in its forward budget planning, QAA should take urgent steps to confirm financial provision for the inclusion of international experts in all of its principal institutional review procedures.

**ESG 3.5 Mission statement  
(ENQA Criterion 4)**

**Standard:**

Agencies should have clear and explicit goals and objectives for their work, contained in a publicly available statement.

**Guidelines:**

These statements should describe the goals and objectives of agencies' quality assurance processes, the division of labour with relevant stakeholders in higher education, especially the higher education institutions, and the cultural and historical context of their work. The statements should make clear that the external quality assurance process is a major activity of the agency and that there exists a systematic approach to achieving its goals and objectives. There should also be documentation to demonstrate how the statements are translated into a clear policy and management plan.

**QAA compliance**

68. The overall formal purposes of QAA as a Company are described above in Para. 56. QAA's corporate governance structure is publicly available on its website, accompanied by the full Memorandum of Association, Articles of Association and other formal documents required by company law. The website provides information about how the Board develops and oversees QAA's strategic direction, and explains the responsibility of the Chief Executive and Directors for directing and managing the organisation.

QAA's overall vision and mission are outlined on its website:

- its vision is to be the authority on UK higher education standards and quality.
- its mission is to safeguard standards and improve the quality of UK higher education.

QAA has four strategic aims that will help it to pursue its vision and achieve its mission.

- to meet students' needs and be valued by them
- to safeguard standards in an increasingly diverse UK and international context
- to drive improvements in UK higher education
- to improve public understanding of higher education standards and quality

QAA has four commitments upon which its strategy is founded:

- the intrinsic worth of higher education
- the entitlements of students
- the public interest in higher education
- the importance of equality and diversity

69. To translate these statements into a clear policy and management plan, QAA uses strategic plans to set the main goals and objectives over a set period of time. Currently QAA is operating under the 2011-14 strategic plan. During QAA's annual planning process, the strategic plan is used as the basis for developing

the (published) annual operating plan. The annual operating plan summarises the group operating plans, which contain the detailed work plans for each group for the year. The service delivery statements, in turn, are the basis for setting individual objectives during annual performance reviews. The QAA Framework for Performance Management, together with the Performance Dashboard, enables systematic monitoring of progress against the objectives. Each year, an annual review is also published describing the achievements of the previous year's work.

The Panel confirms that QAA has clear and explicit goals and objectives for its work, which are appropriately differentiated.

**Panel judgement:**

Fully compliant.

**Panel Recommendations**

None.

### **ESG 3.6 Independence (ENQA Criterion 5)**

#### **Standard:**

Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders.

#### **Guidelines:**

An agency will need to demonstrate its independence through measures, such as:

- its operational independence from higher education institutions and Governments is guaranteed in official documentation (e.g. instruments of governance or legislative acts)
- the definition and operation of its procedures and methods, the nomination and appointment of external experts and the determination of the outcomes of its quality assurance processes are undertaken autonomously and independently from Governments, higher education institutions, and organs of political influence
- while relevant stakeholders in higher education, particularly students/learners, are consulted in the course of quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

### **QAA compliance**

70. QAA is established as a company limited by guarantee with charitable status. In UK law, a charity must operate in accordance with its charitable purposes, and not for the purpose of implementing the policies or carrying out the directions of a governmental authority. In its governance, it is not subject to subsidiarity, either to Government or to individual HEIs.

71. As with the majority of national quality assurance agencies, Government and Funding Councils have an influence on the overall scale and volume of QAA work. Government and the Funding Councils set the broad political objectives within which QAA independently devises and operates its review procedures. An example would be the political decision to include new categories of institution in the review scope. This does not impinge on QAA's operational independence or independent decision making, as defined in the ENQA standard, both as regards norms and processes which specify reference points for the agency's operation and as regards their application and judgement in specific review cases.

72. A Board of Directors is ultimately responsible for QAA operations. The Board of Directors represents a wide range of interests and comprises:

- 4 directors appointed by UScotland, UUK, HEW and GuildHE Ltd. jointly
- 4 directors appointed by DEL, HEFCE, HEFCW and SFC jointly
- 6 independent directors appointed by the Board of Directors
- 1 independent director appointed by the Board of Directors and who at the time of their initial appointment is: (a) either a registered undergraduate or postgraduate student for a course leading to an award of a higher education institution, (b) an elected student officer of a student union
- 1 director to be nominated by the National Union of Students and subject to the approval of the Board of Directors, to be appointed by the Board of Directors

- 1 director nominated by the UK Council of Colleges (UKC) and subject to the approval of the Board of Directors, to be appointed by the Board of Directors.

In appointing the six independent directors, account is taken of the desirability of including persons who have experience of industrial, commercial or financial matters or the practice of any profession. The Chairman is elected by the Board from amongst the six independent directors.

73. As described in Para. 72, the Board is structured so as to safeguard the independence of QAA. QAA's strategy is determined by its Board, which is responsible for ensuring that effective management is in place to deliver that strategy. QAA consults widely whenever there are changes to a review method, or changes are made to the Quality Code. However, the final decisions on such changes lie with QAA itself. The Board is responsible for approving all QAA's key procedures and methods.

The Panel has confirmed that the procedures and methods operated by QAA are determined by the Board in the light of consultations with stakeholders.

74. Although the pool of nominations is made through institutions, the final decision on the appointment of external experts and the determination of the outcomes of its quality assurance processes are undertaken entirely within QAA, according to the published procedures. QAA has full responsibility for the appointment of the external experts appointed to the teams and for the final outcomes of its quality assurance processes. QAA's selection criteria for reviewers include mechanisms to avoid conflicts of interest as part of the process of reinforcing the independence of the judgements reached. With respect to QAA teams who conduct reviews of higher education providers leading to judgements, the judgements made lie solely with the team, and are entirely driven by the processes and criteria specified in the relevant review methodology, free from the influence of third parties.

75. The Panel believes that the issue identified in the 2008 report in regard to potential uncertainty arising from the funding model for QAA has now been satisfactorily addressed, such that QAA now enjoys a longer operational and financial planning horizon. QAA is now able to operate within a three year planning strategy and shares its six year budget plans with its principal stakeholders. Since the last ENQA review, the QAA Board has significantly strengthened its own planning capacity through the establishment of its Finance and Strategy Committee, which oversees a range of robust planning and financial mechanisms. However, revisions to the HEI funding model in England, whereby funding for teaching will reach institutions wholly via student fees (rather than via a combination of tuition fees and grant via HEFCE) will require careful dialogue and safeguarding of this important element of income. The Panel noted that particular care would need to be taken by stakeholders to safeguard this element of funding.

76. The Panel confirms that QAA is an independent body with autonomous responsibility for its operations. The Panel was able to determine that QAA acts entirely independently in making its judgements. All reports, decisions, judgements, recommendations and commendations are those of QAA and its contracted peer reviewers. Its external quality assurance processes and



judgements are driven by criteria and methodologies which cannot be influenced by third parties.

**Panel judgement:**

Fully compliant.

**Panel Recommendations**

- That 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 to the HEI funding model in England, whereby funding for teaching will in future reach institutions wholly via student fees (rather than via a combination of tuition fees and grant via HEFCE).

### **ESG 3.7 External quality assurance criteria and processes used by the agencies (ENQA Criterion 6)**

#### **Standard:**

The processes, criteria and procedures used by agencies should be pre-defined and publicly available. These processes will normally be expected to include:

- a self-assessment or equivalent procedure by the subject of the quality assurance process
- an external assessment by a group of experts, including, as appropriate, student member(s), and site visits as decided by the agency
- publication of a report, including any decisions, recommendations or other formal outcomes
- a follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report.

#### **Guidelines:**

Agencies may develop and use other processes and procedures for particular purposes. Agencies should pay careful attention to their declared principles at all times, and ensure both that their requirements and processes are managed professionally and that their conclusions and decisions are reached in a consistent manner, even though the decisions are formed by groups of different people.

Agencies that make formal quality assurance decisions, or conclusions which have formal consequences, should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of each agency.

### **QAA compliance**

77. All review processes, criteria and procedures used by QAA are pre-defined and publicly available on the QAA website. Publication of new procedures is accompanied by electronic communications, briefings and training events so that they are clearly understood.

78. All QAA review processes include: self-evaluation; external assessments and site visits by a group of experts; publication of a report which states the review team's judgements, makes recommendations and identifies features of good practice; and a follow-up procedure to review actions taken following the recommendations made. HEIs are required to develop and maintain an action plan, demonstrating how good practice is maintained and disseminated, as well as addressing issues raised in recommendations. This provides the basis for following up and monitoring progress. QAA also publishes outcomes papers, overview reports and summaries of good practices and recommendations.

Where a review outcome is negative, the original review team is involved in the follow-up review (for detail, cf. Para. 47 above with reference to ESG 2.6). Detailed information regarding these processes is publicly available. Each individual review is evaluated through questionnaires sent to reviewers, students, and the institution. In addition, most QAA review methods now encourage an (institutional) submission by students, in addition to any direct student involvement in institutional submissions.

Since the 2008 review, QAA has been required to respond swiftly to a number of new developments. From time to time, this has resulted in the need for new procedures, which are developed in discussion with stakeholders. Whatever review processes are used, QAA seeks to ensure that they are professionally managed, and that conclusions and judgements are reached consistently and independently.

79. Following the 2008 report, the Panel can confirm that students are now fully integrated into membership of teams for mainstream review activity. Students are included in QAA activity, as follows:

- Institutional Review in England & Northern Ireland (IRENI), including reviews of collaborative provision:
  - Student reviewers on review teams
  - A Lead Student Representative appointed at the institution being reviewed
  - A Student Written Submission is sought
  - Meetings with students take place during the review
- Review of College Higher Education (RCHE)
  - Activity as detailed above for IRENI, plus an additional opportunity for students to e-mail QAA with their views
- Enhancement-Led Institutional Review (ELIR):
  - Student reviewers on teams
  - Student involvement in annual discussions
  - Students involved in the development of reflective analysis
  - Meetings between the review team and students, during the review
- Institutional Review (Wales):
  - Activity as detailed above for IRENI
- Review for Educational Oversight:
  - Student Written Submission
  - Meetings with students

Students are not involved in reviews relating to the award of Degree-Awarding Powers & University Title; these are specialised procedures where QAA acts as adviser to the Privy Council.

With regard to the Quality Code, there is at least one student on every Advisory Group for the development of its chapters. In addition, the UK's National Union of Students is represented on the main Quality Code Steering Group.

80. QAA has published procedures for responding to complaints about its services, for handling appeals against specific decisions, and for investigating 'concerns' raised with respect to higher education providers' operations. It distinguishes between complaints, appeals, and concerns:

- A complaint is an expression of dissatisfaction with services provided by QAA or actions it has taken.
- An appeal is a challenge to a specific decision, normally linked to one of its review methods, and in specific circumstances.
- 'Concerns' refers to issues raised about individual higher education providers

Since the last ENQA review in 2008, QAA has widened the range of judgements that can be subject to appeal. The following review methods are covered by QAA's appeals procedure:

- Institutional Review in England & Northern Ireland (IRENI)
- Review for Educational Oversight (REO)
- Embedded College Review for Educational Oversight (ECREO)
- Recognition Scheme for Educational Oversight (RSEO)
- Institutional Review (Wales)
- Enhancement-Led Institutional Review (ELIR, Scotland)
- Access Validating Agency Relicensing Review
- Access Validating Agency Initial Licensing

An appeal can be lodged on any the following grounds:

- Procedure (the Review Team failed to carry out agreed procedures, or exceeded its powers, in such way that the legitimacy of the decisions reached are called into question)
- Perversity (the Review Team's conclusions were unreasonable or disproportionate in the light of the available evidence. This may be because irrelevant matters were taken into account or relevant matters were not taken into account)
- New material (There is material that was in existence at the time the Review Team made its decision which had it been made available before the review had been completed, would have influenced the judgements of the team, and in relation to which there is a good reason for it not having been provided to the Review Team).

Appeals are referred initially to an Independent Reviewer for preliminary consideration. The Independent Reviewer is an experienced reviewer who has had no prior involvement in the particular review, drawn from a list of reviewers maintained for this purpose. The provider is given the opportunity to review the list and raise objections to any individual reviewer. The Independent Reviewer considers the Review Team's final report, the appeal lodged by the provider, and any submission made to the Review Team by the provider after the draft report. The Independent Reviewer may reject an appeal only where he/she decides there is no realistic prospect of the appeal being upheld. The Independent Reviewer will outline his/her reasons for rejecting the appeal. In all other cases, the Independent Reviewer refers the appeal to an Appeals Panel. An Appeals Panel consists of three reviewers drawn from a pool of experienced reviewers, maintained for this purpose. QAA has a pre-defined pool of 20 reviewers who can be asked to serve on Appeals Panels. Tailored training is given. The selection of each panel is not ad hoc, but based on availability, experience and training in the relevant review method, and whether there are any conflicts of interest. The institution has the opportunity to raise objections to any particular reviewers proposed for its appeal. The final decision as to whether these objections are accepted is made by the QAA Chair.

No member of an Appeal Panel will have had any prior involvement in the review at issue. The provider is given the opportunity to review the lists and raise objections to any Individual. The Appeal Panel has the responsibility to determine whether the affected review and judgements should be set aside and a new review carried out by a new review team.

Appeal outcomes are also now published on the website. If an institution remains dissatisfied with the outcome of an appeal, it can seek further external redress through the UK Courts (judicial review).

Advice given to Government Ministers on applications for Degree-Awarding Powers (where, as for the granting of University title, QAA is not the final decision-making body) is not currently covered by the appeals procedure. QAA is working with the Privy Council to put in place a process where applicant institutions can make representations to the QAA Board, if an applicant believes that QAA has not followed procedures, or that any recommendations or advice coming from QAA is incorrect. However the final decision on such applications and appeals rests not with QAA, but the UK's Privy Council.

81. The Panel has explored QAA's appeals and complaints/concerns procedures via a number of actual examples. It has also considered statistics and outcomes relating to both appeals and concerns for the period 2009-2013. It believes that the possible grounds for appeal are clearly defined and advertised for each method of review. The appeals procedures are based on independent review and the Panel believes the procedures are operating in a satisfactory manner.

**Panel judgement:**

Fully compliant.

**ESG 3.8 Accountability procedures  
(ENQA Criterion 7)**

**Standard:**

Agencies should have in place procedures for their own accountability.

**Guidelines:**

These procedures are expected to include the following:

1 A published policy for the assurance of the quality of the agency itself, made available on its website.

2 Documentation which demonstrates that:

- the agency's processes and results reflect its mission and goals of quality assurance
- the agency has in place, and enforces, a no-conflict-of-interest mechanism in the work of its external experts
- the agency has reliable mechanisms that ensure the quality of any activities and material produced by subcontractors, if some or all of the elements in its quality assurance procedure are subcontracted to other parties
- the agency has in place internal quality assurance procedures which include an internal feedback mechanism (i.e. means to collect feedback from its own staff and council/Board); an internal reflection mechanism (i.e. means to react to internal and external recommendations for improvement); and an external feedback mechanism (i.e. means to collect feedback from experts and reviewed institutions for future development) in order to inform and underpin its own development and improvement.

3 A mandatory cyclical external review of the agency's activities at least once every five years.

**QAA compliance**

82. QAA policies are publicly available. They help to assure the quality and transparency of QAA's work by providing clear reference points. QAA's Information Publication Scheme reinforces its commitment to openness and transparency. QAA has implemented a Framework for Performance Management, which is published on the QAA website. The framework provides an overarching quality assurance mechanism and helps to embed a strong culture of performance management for the Agency. It consists of four key pillars:

- Objective setting and targets
- Planning, budgeting and resource deployment
- Evaluation, monitoring and performance indicators
- Performance review and reporting

A QAA Performance Dashboard has also recently been developed. The dashboard sets out, in graphical form, current information about how QAA is performing against key targets. QAA publishes an annual report with details of its activities to ensure that its processes and results reflect its mission and goals.

83. The complex stakeholder context within which QAA operates makes necessary a similarly complex accountability system. This includes regular reports to the following:

- the members of the company (UUK, Universities Scotland, HEW, GuildHE)
- the higher education Funding Councils across the four nations
- the Charity Commission (England and Wales)

- the Office of the Scottish Charities Regulator
- Companies House
- QAA's subscribing institutions.

84. The QAA Board has overall responsibility for effective governance and is the body to which QAA is primarily accountable. The QAA Board undertakes a biennial review of its own effectiveness and of that of its Chairman. The Board holds the Chief Executive to account through a number of mechanisms:

- approval and oversight of the delivery of the strategic plan for QAA
- consideration of an Annual Effectiveness Report
- monitoring of group service delivery statements on a quarterly basis.
- monitoring of risk registers on a quarterly basis.
- monitoring an annual programme of internal audit in which an external organisation is commissioned to scrutinise key areas of the Agency's work. (These annual audits result in a report which includes an action plan to address any areas of concern. QAA's Audit Committee agrees the annual internal audit programme, receives audit reports, and checks that action plans are implemented)
- annual personal performance review and objective/ target setting

85. QAA has mechanisms in place to ensure that those undertaking work on its behalf - both internal and external - are fair and impartial in their work, and that conflicts of interest are avoided. These mechanisms include:

- an ethical conduct and anti-bribery policy (applicable to all employees, Board and Board Committee Members, temporary workers, consultants, contractors, agents and subsidiaries acting on behalf of QAA in the UK and overseas)
- a Single Equality Scheme
- a whistle blowing policy
- a code of best practice for members of the QAA Board
- registers of Board Members' and Directors' interests.

86. QAA's human resources policies have been updated to provide guidance for staff wishing to undertake work outside the Agency (paid or unpaid), to ensure that there is no conflict of interest or risk to QAA's reputation. All QAA reviewer contracts include a Code of Practice, and copies of the Ethical Conduct and Anti-Bribery Policy, to prevent conflicts of interest. The QAA reviewer selection processes are designed to identify and screen out potential conflicts of interest, and to achieve a balance in review teams. QAA reviewer training covers equality, diversity and the avoidance of conflicts of interest, and reviewers are asked to declare any interests before being allocated to a review. Details of the review team are sent to the higher education provider in advance, enabling the provider to draw attention to any anticipated conflicts of interest or other concerns.

QAA has developed a Single Equality Scheme in close consultation with staff and with external stakeholders. The Scheme sets out clear, achievable goals and aspirations to promote equality and diversity, in terms of both internal procedures and engagement with the wider higher education sector. QAA has recently published its first annual report on the scheme, together with an updated action plan. QAA has three times successfully achieved Investors in

People<sup>1</sup> recognition. Where subcontractors are involved in QAA activity, whether as reviewers or in any other capacity, their terms of reference or engagement are set out in a formal contractual agreement, against which performance can be managed.

87. There are a number of opportunities to reflect on, and respond to, internal and external recommendations for improvement, and to consider how to respond to, or influence, the changing context in which QAA works.

Internal quality assurance procedures include:

- a confidential annual staff survey, managed by an external body, which provides a route for staff to raise any concerns
- internal reflection mechanisms such as an annual staff conference; scheduled Board, Directorate, group and team 'away days'; and short, informal meetings and cross-Agency groups, monthly staff briefings, where members of staff have the opportunity to raise questions.
- relevant internal quality assurance procedures, which include:
  - clear levels of delegated authority and approval processes for contracts
  - the appointment of internal method coordinators
  - regular moderation meetings
  - formal systems for updating electronic information
  - sign-off and approval processes for publications.
  - rigorous editing and review of QAA publications

External feedback to QAA is provided through:

- a Student Advisory Board, a Research Advisory Group and other groups of external experts
- participants in all QAA events (structured feedback is sought on all training, consultation events, briefings or conferences)
- use of focus groups, blogs, discussion boards and social media.

88. The Panel heard from the QAA staff it met that they had opportunity for personal professional development. The annual staff survey fulfilled a useful function and staff were aware of actions taken in response to feedback. It also heard from external representatives who confirmed the trouble taken by QAA to engage meaningfully with stakeholders through its feedback arrangements. Reviewers confirmed the rigour of the no-conflict-of-interest arrangements and of the quality control mechanisms for sub-contractors.

The Panel can confirm that QAA delivers substantial accountability to key stakeholders through a variety of mechanisms. The Panel has been provided with considerable evidence relating to the wide-ranging and cross-cutting mechanisms in place to underpin QAA's accountability.

### **Panel judgement:**

Fully compliant.

### **Panel Recommendations**

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<sup>1</sup> Launched in 1991, Investors in People is the UK's leading people management standard. It specialises in transforming business performance through people. In 2010, QAA achieved Bronze status in the Investors in People scheme, and will be reviewed again in 2013.



- QAA's Board may wish to consider whether the appointment of an international Director at Board level might further enrich the mix and depth of skills available to the Board. The QAA Board may wish to consider this issue as part of the further development of a broader overarching internationalisation strategy for the Agency.

**ENQA Criterion 8**

- i. The agency pays careful attention to its declared principles at all times, and ensures both that its requirements and processes are managed professionally and that its judgments and decisions are reached in a consistent manner, even if the judgments are formed by different groups;
- ii. If the agency makes formal quality assurance decisions, or conclusions which have formal consequences, it should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of the agency;
- iii. The agency is willing to contribute actively to the aims of ENQA.

**QAA compliance****Management and consistency**

89. QAA's policies and procedures are described fully in its publications and it is governed by these in all of its actions and decision-making processes; they provide the reference point for internal and external stakeholders alike. The Panel considers that QAA has in place robust internal quality control mechanisms which ensure that judgements and decisions are consistently made. The quality of its work is overseen by the Board and managed by a highly professional staff.

**Appeals procedures**

90. Appeals procedures are discussed under Standard 3.7.

**Involvement with ENQA**

91. QAA was a founding member of ENQA, and has contributed to ENQA's aims and activities in various ways:

- through membership of the ENQA Board
- through membership of ENQA project groups
- through direct practical engagement, whereby every QAA Director is a member of an ENQA working group (and a former QAA Assistant Director held the vice-presidency of ENQA)
- through representation at Director level, on ENQA's standing Internal Quality Assurance (IQA) working group.

The Panel heard that through its ENQA involvement, QAA aims to share and disseminate knowledge, and to learn from the working practices of other agencies.

**Panel judgement:**

Fully compliant.

**Panel Recommendations**

None.

## **Overall findings**

### **Future challenges**

92. The Panel concurs with QAA's assessment of the challenges it will need to respond to effectively in the medium term. These include:

- managing carefully a transition to a more risk-based approach to reviews in England and Northern Ireland
- deepening the involvement of civil society, in particular of the employment sector
- maintaining a flexible and effective response to continuing diversity of needs through devising different types of review which meet the requirements of the four nations of the UK.
- maintaining diversity in institutional subscribers through a steady growth in voluntary subscriptions to QAA from higher education providers from both the private and further education college sectors
- deepening the relationship with the further education sector
- keeping under review the governance of QAA, the allocation of resources and QAA's organisational structures, so as to best manage relationships with both existing and new subscribers
- further development of subscriber services, tailored to the needs of different providers
- maintaining a finance strategy which sets out the aim of securing financial independence through sustainable, diversified income streams, and includes a balanced approach, encompassing both cost efficiencies and (appropriate) revenue generation
- using resources flexibly and creatively, coupled with a robust performance management and service culture
- addressing internationalisation, both at institutional level and in review processes
- developing a new approach to quality assuring transnational education, in order to provide public assurance that wherever UK higher education is delivered, it will meet UK expectations in full and be reasonably priced for students (in relation to UK-based programmes)
- continuing to play an appropriate part in European and international networks, and selective involvement in collaborations where these are relevant to core business.

### **Aspects of good practice**

93. In addition to examining QAA's compliance with the ESG, this review has also identified a number of features of good practice in the Agency's work. These include:

- QAA's robust governance structure (Paras. 17 and 18)
- the careful process adopted for developing the UK Quality Code for Higher Education (Para. 34)
- the rationale and design underpinning QAA's reviews of transnational education (Para. 20)
- the approach to reviewer training (Para. 43)
- the strategic approach to student engagement (Para. 43)
- the design and roll-out of internet, multimedia, and social media communication techniques in support of enhanced public engagement
- the trajectory for the internationalisation of QAA's work (Para. 46)

- QAA's sector-wide analyses of review outcomes, in support of quality enhancement (Para. 52)

### **QAA's performance against the ENQA membership criteria**

94. It is the Panel's assessment that **Full Compliance** has been achieved in all criteria as follows:

- ENQA criterion 1 (overall): Use of external quality assurance procedures for higher education (ESG 3.1):
  - ENQA Criterion 1, sub-criterion: Use of internal quality assurance procedures (ESG 2.1)
  - ENQA Criterion 1, sub-criterion: Development of external quality assurance processes (ESG 2.2)
  - ENQA Criterion 1, sub-criterion: Criteria for decisions (ESG 2.3)
  - ENQA Criterion 1, sub-criterion: Processes fit for purpose (ESG 2.4)
  - ENQA Criterion 1, sub-criterion: Reporting (ESG 2.5)
  - ENQA Criterion 1, sub-criterion: Follow-up procedures (ESG 2.6)
  - ENQA Criterion 1, sub-criterion: Periodic reviews (ESG 2.7)
  - ENQA Criterion 1, sub-criterion: System-wide analyses (ESG 2.8)
  - ENQA Criterion 1, sub-criterion: Activities (ESG 3.3)
- ENQA criterion 2 (ESG 3.2): Official status
- ENQA criterion 3 (ESG 3.4): Resources
- ENQA criterion 4 (ESG 3.5): Mission statement
- ENQA criterion 5 (ESG 3.6): Independence
- ENQA criterion 6 (ESG 3.7): External quality assurance criteria and processes used by the agencies
- ENQA criterion 7 (ESG 3.8): Accountability procedures
- ENQA criterion 8: ENQA specific

### **Conclusion**

95. Since the 2008 review, QAA's range of activities has continued to grow both in size and complexity, to the extent that it is now one of the largest quality assurance agencies in Europe. QAA has addressed the issues raised in the 2008 report very effectively. QAA's overall performance against the standards of the ESG is uniformly high. It is a trustworthy, effective and highly credible agency and a leader in the field. QAA is well-led and well-managed at both Board and Executive levels, with a strong Board, which is both well-informed and constructively challenging. The Panel has been consistently impressed by the calibre and professionalism of all those contributing to the work of QAA in maintaining quality and standards across HE in the UK.

Where the Panel has made detailed comments on particular aspects of its work, these are designed to deliver further incremental improvement to an already strong organisation.

In the light of the documentary and oral evidence considered by it, the Review Panel is satisfied that, in the performance of its functions, QAA is in compliance with the ENQA Membership Provisions.

**The Panel therefore recommends to the Board of ENQA that QAA should have its Full Membership of ENQA confirmed for a further period of five years.**

## Summary of recommendations

96. The Panel makes a number of recommendations to QAA:

i) QAA should consider the development of a strategy which takes account more directly of the needs as stakeholders of business and industry at both Board and operational level. Additional input could be sought from this constituency in both review method planning and development and also in its subsequent operation (Para. 35).

ii) The 'risk-based approach to quality assurance' should be developed further, (as already planned by QAA), bearing in mind the need to ensure conceptual clarity and procedural fitness for coherent implementation (Para. 35).

iii) The Panel recognises that QAA currently ensures that a balance is maintained between the need formally to articulate detailed indicators of sound practice in the Quality Code, and the need also to allow for some flexibility of judgement in the review process itself, while still safeguarding the overall coherence of judgements. The Panel endorses the continuation of this approach, which can, in the Panel's view, continue to be achieved through QAA's commendable practices of both training reviewers thoroughly and also providing professional guidance throughout the review process. The Panel recommends that a continuing commitment to this balanced approach will be essential for the successful implementation of both the Quality Code and the planned risk-based approach to quality assurance (Para. 37)

iv) Following agreement in principle by the QAA Board, the Panel would urge the early implementation of the inclusion of an international reviewer in all its institutional review programmes across the UK as a standard feature. In the Panel's view, this will bring added depth, experience, insight and added value both to QAA's review activities and to institutional quality enhancement capacity, by providing a wholly unbiased system-wide view on operations, unfettered by traditions (Para. 43).

v) QAA should continue its efforts to position its operations, where possible and appropriate, with quality criteria and procedures determined by professional, statutory and regulatory bodies (PSRBs) responsible for accreditation (Para. 43).

vi) That QAA should continue to exercise extreme care in the introduction of the new review process of Higher Education Review in England and Northern Ireland. In particular the criteria for the definition of risk and for differentiating procedural consequences would need to be robust in substance, viable for coherent implementation, and transparent to the institutions concerned and to the general public (Para. 50).

vii) That in its forward budget planning, QAA should take urgent steps to confirm financial provision for the inclusion of international experts in all of its principal institutional review procedures (Para. 67)

viii) That 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 to the HEI funding model in England, whereby funding for teaching will in future reach institutions wholly via student

fees (rather than via a combination of tuition fees and grant via HEFCE) (Para. 75).

ix) QAA's Board may wish to consider whether the appointment of an international Director at Board level might further enrich the mix and depth of skills available to the Board. The QAA Board may wish to consider this issue as part of the further development of a broader overarching internationalisation strategy for the Agency (Para. 88).

## APPENDIX 1

Site visit to QAA: Schedule of meetings

8 – 9 May 2013

<b>ENQA REVIEW OF QAA: REVIEW PANEL VISIT TO QAA</b>			
<b>8 - 9 May 2013 (Southgate House, Gloucester, UK)</b>			
<b>WEDNESDAY 8 MAY 2013</b>			
<b>TIME</b>	<b>MEETING/ ACTIVITY</b>	<b>LOCATION</b>	<b>QAA REPRESENTATIVES</b>
08.00-09.00	REVIEW PANEL AND PRIVATE MEETING	Boardroom	
09.00	Short welcome meeting with QAA co-ordinators for the review	Boardroom	i) <u>Douglas Blackstock</u> , Director of Resources ii) <u>Jane Grey</u> , Policy Adviser iii) <u>Lindsay Houghton</u> , Assistant to the Director of Resources
09.15	MEETING ONE: Chief Executive & Chair	Boardroom	i) <u>Sir Rodney Brooke</u> , Chair, QAA Board of Directors ii) <u>Anthony McClaran</u> , QAA Chief Executive
10.15	MEETING TWO: <i>UK Quality Code</i> and other reference points, and enhancement activities	Boardroom	i) <u>Dr Claire Carney</u> , Head of Enhancement Themes, Scotland ii) <u>Dr Melinda Drowley</u> , Head of Standards, Quality & Enhancement, Research, Development & Partnerships Group iii) <u>Dr Jayne Mitchell</u> , Director of Research, Development & Partnerships Group
11.30 – 11.45	PRIVATE BREAK & REFRESHMENTS	Boardroom	
11.45	MEETING THREE: Degree-awarding powers and university title	Boardroom	i) <u>Dr Irene Ainsworth</u> , Head of Degree-Awarding Powers & University Title ii) <u>Ailsa Crum</u> , Head of Reviews, QAA Scotland
12.15 – 13.00	PRIVATE LUNCH	Boardroom	
13.00	MEETING FOUR: Reviews	Boardroom	i) <u>Adam Biscoe</u> , Head of Educational Oversight & Accreditation ii) <u>Ailsa Crum</u> , Head of Reviews, QAA Scotland iii) <u>Kath Dentith</u> , Head of Access iv) <u>Dr Julian Ellis</u> , Head of QAA Wales & Head of Concerns v) <u>Dr Jane Holt</u> , Assistant Director, Research, Development and Partnerships Group vi) <u>Dr Stephen Jackson</u> , Director of Reviews vii) <u>Will Naylor</u> , Deputy Director of Reviews

14.15	MEETING FIVE: Higher education providers: staff responsible for quality	Boardroom	<ul style="list-style-type: none"> <li>i) <u>Professor Gill Nicholls</u>, Deputy Vice-Chancellor (Academic Development), University of Surrey</li> <li>ii) <u>Karen Jones</u>, University Registrar, University of South Wales, Newport</li> <li>iii) <u>Jon Renyard</u>, Director of Academic Services, Arts University Bournemouth</li> <li>iv) <u>Dorothea Ross-Simpson</u>, Head of Governance and Quality Assurance, Keele University</li> <li>v) <u>Liz Turner</u>, Head of Academic Policy &amp; Quality Office, Oxford Brookes</li> </ul>
15.15-15.30	PRIVATE BREAK & REFRESHMENTS	Boardroom	
15.30	MEETING SIX: Students (members of the QAA Student Advisory Board)	Boardroom	<ul style="list-style-type: none"> <li>i) <u>Richard Alderman</u>, University of Sheffield</li> <li>ii) <u>Dan Derricott</u>, University of York (part-time student) and student Member of QAA Board</li> <li>iii) <u>Graeme Osborn</u>, University of York</li> <li>iv) <u>Alexander Pool</u>, University of Bath</li> <li>v) <u>Josh Smith</u>, University of Leeds</li> <li>vi) <u>Emilia Todorova</u>, Glasgow Caledonian University</li> <li>vii) <u>Marianne Cantieri</u>, Open University</li> </ul>
16.30	MEETING SEVEN: Complaints, concerns and appeals	Boardroom	<ul style="list-style-type: none"> <li>i) <u>Dr Julian Ellis</u>, Head of QAA Wales &amp; Head of Concerns</li> <li>ii) <u>Dr Jon Levett</u>, Head of Corporate Affairs</li> </ul>
17.00	PRIVATE MEETING, THEN DEPART FOR HOTEL	Boardroom	



<b>DAY TWO: THURSDAY 9 MAY 2013</b>			
<b>TIME</b>	<b>ACTIVITY</b>	<b>LOCATION</b>	<b>QAA REPRESENTATIVES</b>
08.00-09.00	REVIEW PANEL ARRIVAL & PRIVATE MEETING	Boardroom	-
09.00	MEETING EIGHT: System-wide analyses (to include research, intelligence)	Boardroom	<ul style="list-style-type: none"> <li>i) <u>Dr Liz Halford</u>, Head of Research, Information &amp; Enquiry, Research, Development and Partnerships Group</li> <li>ii) <u>Dr Brian Lehaney</u>, Assistant Director, Research, Information &amp; Enquiry, Research, Development &amp; Partnerships Group</li> </ul>
09.45	MEETING NINE: External engagement including public, student, international, professional, statutory and regulatory bodies, and wider stakeholders	Boardroom	<ul style="list-style-type: none"> <li>i) <u>Carolyn Campbell</u>, Head of Networks &amp; Partnerships, Research, Development and Partnerships Group</li> <li>ii) <u>Zoe Forbes</u>, PR Manager</li> <li>iii) <u>Dr David Gale</u>, Assistant Director, Networks and Partnerships, Research, Development and Partnerships Group</li> <li>iv) <u>Richard Jarman</u>, Director of Public Engagement</li> <li>v) <u>Chris Taylor</u>, Student Engagement Manager</li> <li>vi) <u>Julie Thornton</u>, Multimedia Manager</li> </ul>
10.45 – 11.00	PRIVATE BREAK & REFRESHMENTS	Boardroom	-
11.00	MEETING TEN: QAA professional staff	Boardroom	<ul style="list-style-type: none"> <li>i) <u>Rachel Beckett</u>, Technical Editor, Public Engagement Group</li> <li>ii) <u>Matthew Cott</u>, Assistant Director, Reviews</li> <li>iii) <u>Ann-Marie Karadia</u>, Review Administrator</li> <li>iv) <u>Jean Mclaren</u>, Development Officer, Research Information &amp; Enquiry</li> <li>v) <u>Maureen Mclaughlin</u>, Assistant Director and IRENI Review Method Co-ordinator</li> <li>vi) <u>Lucy Moore</u>, Planning Accountant, Finance &amp; Planning</li> <li>vii) <u>Dr Fabrizio Trifiro</u>, Development Officer,</li> </ul>

			<p>Networks &amp; Partnerships, Research, Development and Partnerships Group</p> <p>viii) <u>Gail Wilson</u>, Development Officer, Standards, Quality &amp; Enhancement, Research, Development and Partnerships Group</p>
11.45 (60 mins)	MEETING ELEVEN: Employer/professional, statutory and regulatory bodies, and Funding Council representatives	Boardroom	<p>i) <u>Tish Bourke</u>, Policy Adviser, Higher Education Funding Council for England (HEFCE)</p> <p>ii) <u>Fiona Browne</u>, Head of Professional Standards, General Osteopathic Council</p> <p>iii) <u>Linda Ford</u>, Head of Education &amp; Standards, General Optical Council</p> <p>iv) <u>Deborah Seddon</u>, Head of Policy &amp; Standards, Engineering Council</p> <p>v) <u>Kirsty White</u>, Head of Planning, Research and Development (formerly Head of Quality Assurance until March 2013), General Medical Council</p>
12.45 – 13.30	PRIVATE LUNCH	Boardroom	
13.30	MEETING TWELVE: Resources and planning	Boardroom	<p>i) <u>Douglas Blackstock</u>, Director of Resources</p> <p>ii) <u>Liz Clegg</u>, Head of Human Resources &amp; Organisational Planning</p> <p>iii) <u>Jennie Evans</u>, Head of Business Strategy &amp; Development</p> <p>iv) <u>Graham Hardy</u>, Head of Information Management &amp; Infrastructure</p> <p>v) <u>Liz Rosser</u>, Head of Finance &amp; Planning</p> <p>vi) <u>John Tredwell</u>, QAA Board Member &amp; Chair of QAA Audit Committee</p>
14.30	MEETING THIRTEEN: QAA reviewers	Boardroom	<p>i) <u>Professor Elizabeth Barnes</u>, Pro Vice-Chancellor, University of Derby</p> <p>ii) <u>Professor Ann Holmes</u>, Deputy Vice-Chancellor (Academic), University of Wolverhampton</p> <p>iii) <u>Mr Matthew Kitching</u> (student reviewer), Buckinghamshire New University</p> <p>iv) <u>Duncan Lean</u> (student</p>

			reviewer), University of York v) <u>Professor Denis Wright</u> , Imperial College, London
15.30	PRIVATE BREAK & REFRESHMENTS	Boardroom	
16.00	MEETING FOURTEEN: Chief Executive and Directors	Boardroom	i) <u>Anthony McClaran</u> , Chief Executive ii) <u>Douglas Blackstock</u> , Director of Resources iii) <u>Dr Bill Harvey</u> , Director of QAA Scotland iv) <u>Dr Stephen Jackson</u> , Director of Reviews v) <u>Richard Jarman</u> , Director of Public Engagement vi) <u>Dr Jayne Mitchell</u> , Director of Research, Development & Partnerships
17.00	PRIVATE MEETING, THEN DEPART FOR HOTEL	Boardroom	

## APPENDIX 2

<b>DOCUMENTARY EVIDENCE</b>	
<b>1. Documents submitted in advance</b>	
<b>1.1 QAA Self Evaluation Report (SER) dated March, 2013</b>	
<b>1.2 SER Appendices</b>	Letter from Secretary of State for Education and Employability, 13 March 1997
	The UK Quality Code for Higher Education: <ul style="list-style-type: none"> <li>i) A Brief Guide</li> <li>ii) All Parts and Chapters of the UK Quality Code for Higher Education</li> </ul>
	Examples of QAA review handbooks, covering the four nations of the UK: <ul style="list-style-type: none"> <li>i) Institutional Review (England and Northern Ireland)</li> <li>ii) Enhancement-led Institutional Review (Scotland)</li> <li>iii) Institutional Review (Wales)</li> </ul>
	Code of best practice for members of the QAA Board
	QAA Consolidated Appeals Procedure (2013)
	QAA Companies House Certificate of Incorporation
<b>2. Further documents/information requested and provided in advance:</b>	
	A high level breakdown of sources of QAA income and principal areas of spend
	Statistics of appeals and 'concerns' for 2009 - 2013
	Sample of a training programme for Reviewers (provided for IRENI)
	A note of clarification as to which of all the different types of QAA activity include students in the relevant panel membership and which do not
	A note of clarification as to which of all the different types of QAA review activity include an appeals procedure and which do not
	QAA's research strategy (awaiting publication)
<b>3. Further documents made available during visit:</b>	
	QAA Annual Summary 2011-12
	Pre-consultation draft of Part A of UK Quality Code (Setting and maintaining academic standards)
	Implementation timeline for UK Quality Code
	QAA framework for Performance Management
	Quality Assurance Framework for monitoring the QAA framework for Performance Management
	Terms of reference for Research Policy Steering Group and Research Advisory Group
	Summary paper of Review method changes, activity, evaluations

	and impact
	Paper on the Operational Quality Cycle
<b>4. QAA website</b>	<b><a href="http://www.qaa.ac.uk">www.qaa.ac.uk</a></b>

## **APPENDIX 3**

### **Statement from QAA**

It is important that quality assurance agencies subject themselves to external review. The Quality Assurance Agency for Higher Education values highly our membership and participation in ENQA and committed fully to this review process.

QAA welcomes this report for its positive endorsement of our work but also for the very helpful identification of good practice and areas where we can strive to improve.

The recommendations will be taken seriously by our Board and Directorate and we will produce an appropriate action plan in response.

Undergoing this review has been an important learning exercise for QAA. The process of self evaluation involving stakeholders, Board members, expert reviewers and staff has been hugely developmental for us. We will be using our SER as a tool during induction of new staff and the report for wider discussion with stakeholders.

Our experience of the review itself, with the challenge posed by an expert panel, was positive and we thank them for their work.

**3 July 2013**