Degree Awarding Powers in England: Guidance for Providers on Assessment for Variation and Revocation of Degree Awarding Powers

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Contents

Introduction ................................................................................................................................. 1
The assessment: key features .................................................................................................... 2
  Context, purpose and nature of assessment ........................................................................ 2
  Expert assessment .................................................................................................................. 2
  Specialist advice .................................................................................................................... 3
  Assessment against the criteria for DAPs ........................................................................... 3
  Student engagement .............................................................................................................. 4
  Initiating the process ............................................................................................................ 4
Assessment for positive forms of variation
(i.e. time-limited to indefinite DAPs and extension of powers) ........................................ 4
  Preparatory stages ................................................................................................................ 4
  Submission of evidence ....................................................................................................... 5
  Desk-based assessment ....................................................................................................... 5
  Assessment team visit ......................................................................................................... 6
  Report and advice to OfS .................................................................................................... 7
  Representations ..................................................................................................................... 8
Assessment for OfS regulatory interventions ......................................................................... 8
  Assessment visit .................................................................................................................. 8
  Outcome of assessment ....................................................................................................... 8
Annex 1: The assessment by QAA: standard process and indicative timeline ................... 10
Introduction

1 The Quality Assurance Agency for Higher Education (QAA) is the body designated by the Secretary of State to perform the quality and standards assessment functions required by the Higher Education and Research Act 2017. Assessment for the variation and revocation of degree awarding powers (DAPs) is the process QAA uses to provide advice to the Office for Students (OfS) about the quality of, and the standards applied to, higher education delivered by a provider in England that has an existing DAPs authorisation and where variation or revocation is to be considered.

2 OfS will request such advice in the following circumstances:

a) when a provider with an existing time-limited DAPs authorisation is seeking indefinite DAPs. A provider that is granted Full DAPs by the OfS will hold its award on a time-limited basis in the first instance. After three years of operating with an authorisation for Full DAPs, the provider will be subject to an assessment, which, if successful, would enable authorisation with no time limit. An authorisation with no time limit is referred to as ‘indefinite DAPs’. Providers with an existing DAPs authorisation granted by the Privy Council on a renewable basis, who have operated with DAPs for three or more years, may also make a request to the OfS for consideration for indefinite DAPs and will be subject to assessment as outlined in this document.

b) when a provider with existing time-limited Full DAPs or indefinite DAPs is seeking an extension to its powers to cover additional academic levels or subject areas. Any extension to these powers will be subject to assessment as outlined in this document. The exception to this is where providers are seeking a new Research DAPs authorisation. Such providers are required to submit a new application which will be considered under the assessment method outlined in Degree Awarding Powers in England: Guidance for Providers on Assessment by QAA.¹

3 Where a provider is seeking an extension to powers at the same time as seeking indefinite DAPs, the assessment of both aspects will be conducted concurrently.

4 OfS may also refer cases to QAA for advice when it is considering whether to vary or revoke a provider’s DAPs as a form of regulatory intervention. Further detail on the circumstances in which OfS will seek advice are outlined in Regulatory advice 17: variation and revocation of degree awarding powers.²

5 The main features of the assessment process used in the circumstances specified in paragraphs 2 and 4 are outlined below. This document begins by setting out the key features of the assessment process that applies in all circumstances and goes on to address specific features when applied as a form of regulatory intervention. The scope and nature of any assessment will be determined by the OfS and will be appropriate and proportionate for the type of variation under consideration.

6 This document should be read in conjunction with Degree Awarding Powers in England: Guidance for Providers on Assessment by QAA, in which topics common to all DAPs assessments, such as the external experts and specialist advisers who will take part

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¹ Available at: www.qaa.ac.uk/en/reviewing-higher-education/degree-awarding-powers-and-university-title/guidance-and-criteria/applicants-in-england
² Available at: www.officeforstudents.org.uk/publications/regulatory-advice-17-variation-and-revocation-of-daps
in the process, are described in detail. This document should also be read in conjunction with the regulatory framework and the regulatory advice published by the OfS.3

The assessment: key features

Context, purpose and nature of assessment

7 The purpose of QAA’s DAPs assessment is to provide advice to the OfS as to whether the provider, continues to:

- meet the DAPs criteria
- provide, and maintain the provision of, higher education of an appropriate quality
- apply, and maintain the application of, appropriate standards to that higher education.

8 The OfS will carry out an initial review before referring a provider to QAA for advice.

9 QAA’s assessment for the variation or revocation of degree awarding powers will not normally replicate the detailed scrutiny carried out when DAPs are first awarded; it is intended to confirm that the powers in question have been exercised securely and that any new powers sought will also be exercised securely. The OfS may, however, ask QAA to carry out such detailed scrutiny where it considers this necessary. The nature of assessment to be undertaken will be determined by OfS’s initial review and OfS will specify the scope and level of detail of assessment in its referral to QAA. The OfS will specify whether the assessment should be desk-based in the first instance or should automatically require a visit to the provider.

10 Annex 1 (page 10) sets out the standard assessment process and an indicative timeline.

Expert assessment

11 All DAPs assessments are conducted by teams of external experts appointed by QAA according to the criteria in Annex 2 of Degree Awarding Powers in England: Guidance for Providers on Assessment by QAA. Typically, the team will include members with expertise in academic and professional support services, in exercising degree awarding powers and in representing the interests of students.

12 A QAA Officer will coordinate the assessment for each provider, support the team of experts and act as the primary point of contact with the provider. Providers will also be invited to nominate a facilitator who will coordinate the assessment on behalf of the provider. Further information about the roles and responsibilities of the QAA Officer and provider facilitator is given in Annex 3 of Degree Awarding Powers in England: Guidance for Providers on Assessment by QAA.

13 The size and composition of the team will be tailored to the characteristics of the provider to be assessed, the type of powers held, and any requirements specified in the OfS’s referral. Between them, experts will have the appropriate knowledge, skills and expertise to undertake assessment against the DAPs criteria. It is envisaged that a typical team will comprise three external experts and a QAA Officer. Where appropriate, one or

more members of the team may be subject specialists. This would particularly be the case for providers who deliver, or are seeking powers to deliver, programmes in a single or small number of subject areas. Details of team members, and subject specialists if used, will be shared with the provider to allow it to draw attention to any possible conflicts of interest or duty.

Specialist advice

14 QAA may also make use of specialist advisers during assessments, including subject specialists (academics with expertise in the subject areas in which the provider offers courses). The role of a specialist adviser will be to analyse specific aspects of provision and give additional advice to the assessment team about whether the provider demonstrates that it meets the DAPs criteria in those areas, and whether and how that should be further explored.

15 Where subject specialist advice is required it will be sought during the desk-based assessment stage (see paragraphs 31 and 36). A subject specialist may be asked to review a sample of course documentation to confirm standards continue to be set and maintained at an appropriate level. They may also review proposed course documentation pertaining to additional academic levels or subject areas being sought by the provider to give a view on the setting of academic standards. They may accompany the assessment team on any visit to the provider and/or may undertake observations of certain activities at the provider and/or review assessed student work, if required. The decision about whether a subject specialist attends a visit will depend on any points arising from the desk-based assessment of documentary evidence which requires further investigation or assessment at the provider.

16 Assessments of providers with Research DAPs seeking indefinite powers will always involve seeking specialist advice from UK Research and Innovation (UKRI). For other DAPs assessments, it is envisaged that the use of additional advisers will be exceptional, where the provider has, and/or its provision has, particularly unusual or distinctive characteristics, or where the team's initial desk-based assessment raises issues which were not apparent at the beginning of the process when the team was composed.

17 The team will have regard to any specialist advice when drawing its conclusions from the assessment process.

Assessment against the criteria for DAPs

18 The OfS’s criteria for authorisation for DAPs are designed to ensure that a provider with DAPs demonstrates a firm guardianship of academic standards, a firm and systematic approach to the assurance of the quality of the higher education that it provides, and the capacity to contribute to the continued good standing of higher education in England.

19 The overarching criterion for the authorisation for DAPs is that a provider must be ‘a self-critical, cohesive academic community with a proven commitment to the assurance of standards supported by effective quality systems’.

20 Guidance on the underpinning criteria for the authorisation for DAPs is set out in Offs’s regulatory framework for higher education in England. To support clarity of communication between providers and QAA, the DAPs criteria and evidence requirements from the OfS’s regulatory framework have been given unique identifiers and are reproduced in Annex 4 of Degree Awarding Powers in England: Guidance for Providers on Assessment by QAA.
21 The DAPs criteria, including the overarching criterion, are the reference point for QAA’s assessment process and teams will assess providers against these criteria. The advice to the OfS on QAA’s assessment of the provider will include QAA’s view about whether the provider continues to meet these criteria and, in each case, will provide the reasons and evidence on which its advice is based. For providers seeking an extension of powers, the advice to the OfS on QAA’s assessment of the provider will also include QAA’s view about whether the provider has demonstrated that it meets these criteria in the context of the extension of powers sought.

**Student engagement**

22 The QAA team of experts will ask to see evidence of student engagement and gather students’ views about various aspects of their educational experience as this relates to the DAPs criteria. Students can contribute evidence by participating in meetings with the assessment team, where a visit takes place. Students can also contribute evidence through a student submission produced by the student body to help the assessors understand students’ views about the part(s) of the provision under assessment. Provision of a student submission is optional and further guidance on the purpose, content and format is available from QAA.

**Initiating the process**

23 The assessment process is initiated when the OfS refers a provider to QAA, specifies the nature, scope and depth of the assessment required, and supplies contextual information relating to the assessment.

24 The standard process for the assessment, and an indicative timeline, are set out in Annex 1.

**Assessment for positive forms of variation (i.e. time-limited to indefinite DAPs and extension of powers)**

25 The assessment of a provider for the reasons outlined in paragraph 2 above will normally follow the standard assessment process as set out below and in Annex 1.

**Preparatory stages**

26 QAA will contact the provider to begin preparing for the assessment. The preparations will comprise:

- an initial briefing to help the provider prepare for its QAA assessment and allow it to ask questions and receive further information about the process and the likely evidence required
- a discussion about the timeline for the assessment, including the date by which the provider should upload its self-assessment and initial evidence, whether the assessment is likely to involve a visit to the provider, and potential student engagement (see paragraph 22)
- notification from the provider of the impact of any changes to the provider’s academic structure and/or academic governance that have occurred since its last DAPs authorisation
- details of any changes to the provider’s higher education provision, and its quality assurance policies and processes, that have occurred since its last DAPs authorisation
• identification of a proposed assessment team based on the information provided by the OfS and the provider.

Submission of evidence

27 Following the initial briefing, providers are required to submit to QAA a self-assessment which describes, analyses and comments clearly and explicitly on how the provider meets the DAPs criteria associated with the powers it currently holds. Where the provider is seeking an extension of its powers, the provider self-assessment should also clearly indicate how the provider considers it meets the criteria in the context of the additional powers sought. The self-assessment should provide contextual information for the application, including a brief summary of any changes to the provider's structure and academic governance, higher education provision, and quality assurance processes that have occurred since the last assessment for DAPs. It should also include details of the higher education awards and programmes currently offered and plans for future delivery within its current authorisation and/or proposed extension of powers (where applicable).

28 The provider should submit initial evidence to support the claims made in the self-assessment. This self-assessment and initial submission of evidence will assist in the planning of the assessment and will also be used by the team for its initial desk-based assessment against the DAPs criteria.

29 In submitting its initial evidence, the provider should make use of existing documentation wherever possible. It should not be necessary for the provider to prepare material especially for this assessment, except for the self-assessment. The team is likely to request further evidence, including samples of evidence at departmental or programme level, as the assessment progresses.

30 Annex 5 of Degree Awarding Powers in England: Guidance for Providers on Assessment by QAA offers detailed guidance on the types of evidence providers might submit for a new application for DAPs and is therefore relevant for providers seeking an extension of powers. Providers are encouraged to select evidence that would be appropriate and proportionate to demonstrate how it meets the DAPs criteria in the context of the additional powers sought. Annex 5 can also be used by providers to select evidence that demonstrates how the DAPs criteria for powers under an existing authorisation are met. Providers should select evidence that is appropriate and proportionate to the nature, scope and depth of the assessment. Annex 5 is indicative only and it is likely, given the nature of the assessment, that not all items listed will be appropriate. Other evidence not listed in Annex 5 may also be supplied by the provider and/or requested by the assessors if this will help with demonstrating whether the criteria are met.

Desk-based assessment

31 All assessments will include a desk-based assessment. The OfS will specify in its referral whether it also requires a visit to the provider. QAA will check that the submission includes sufficient information to enable the expert team to conduct its desk-based assessment. Each expert will be assigned specific DAPs criteria to lead on and will undertake their initial analysis independently. Team members will record their desk-based analysis using a standard template to ensure all relevant areas are considered and that a consistent approach to assessment is adopted. The purpose of the desk-based assessment is for the team to:

• familiarise themselves with the provider
• assess evidence against the DAPs criteria to determine areas that require follow-up investigation
• assess the impact of any significant changes or developments since the last assessment or renewal that may affect the provider’s ability to continue to meet the DAPs criteria
• assess how the provider has operated DAPs and whether the provider continues to meet the DAPs criteria
• assess how the provider considers it meets the DAPs criteria for any extension of powers sought (where applicable)
• determine what further evidence is required from the provider, including a sample of evidence on the setting and maintaining of standards at departmental and/or programme level to be made available
• determine whether advice is likely to be needed from subject specialist(s) or other expert advisers to confirm that the provider applies and maintains academic standards at an appropriate level.

32 Normally the outcome of the desk-based assessment will be a request to the provider for further information. Where multiple examples of supporting evidence from departmental or programme levels are required, the QAA Officer will give guidance on the selection of samples.

33 Once the provider has supplied the further evidence requested, the review team will assess the evidence and meet in private to discuss its findings.

34 Where the OfS has not specified a visit to the provider, the team will discuss and agree its conclusions at this stage.

35 Where a visit is required, the overall programme of activities will be confirmed with the provider as soon as possible after the team meeting, including:

• confirming whether advice is to be requested from subject specialist(s) or other expert advisers
• identifying any further evidence to be requested from the provider
• planning the visit, agreeing a programme of activities, specifying the people whom the team should meet, and what further information the team should seek to learn from them.

36 Where the OfS has specified a desk-based assessment only, if the team finds an issue or issues which they consider might warrant further investigation by way of a visit to the provider, the team will inform QAA, who will in turn consult the OfS. The provider will be informed only if the OfS decides that a visit should take place. The timings for the visit will be determined through discussion with the OfS and the provider and will allow the provider and team to prepare for the visit.

Assessment team visit

37 Where a visit is required, it is likely to be one to three days in duration. Meetings are likely to involve governors, senior managers, staff and students. The visit will be used to explore those areas that, through the desk-based assessment, have been highlighted as requiring further investigation and clarification before the team can draw its conclusions. It may also include observations of teaching or review of assessed work by a subject specialist where required. The team may request additional evidence during the visit.

38 The team will meet privately to discuss its findings and agree its conclusions. No feedback will be given to the provider at the end of the visit. The team has discretion to extend the visit in exceptional circumstances; for example, where a serious issue emerges
which was not apparent beforehand. Where it is not possible to extend the visit, it may be necessary to organise a second, follow-up visit.

**Report and advice to OfS**

39 The final outcome of QAA's assessment is advice to the OfS. The Advisory Committee on Degree Awarding Powers (ACDAP), a sub-committee of QAA's Board of Directors, formulates and confirms this advice on the basis of the assessment team's report. QAA's advice includes whether the provider continues to meet the DAPs criteria for its existing authorisation and, where relevant, meets the criteria for the extension of powers sought, as set out in the OfS's regulatory framework.

40 QAA’s advice to the OfS on the assessment of the provider will include the team’s views about whether, for the powers it holds, and any new powers sought, the provider:

- meets the DAPs criteria
- provides, and maintains the provision of, higher education of an appropriate quality
- applies, and maintains the application of, appropriate standards to that higher education.

41 In each case, QAA will provide the OfS with the reasons and evidence for its advice. The decision about whether the DAPs criteria are met rests with the OfS.

42 Once evidence gathering has been completed, the team will produce a report to summarise its findings from its assessment of the provider against the DAPs criteria. The report will be structured according to the DAPs criteria and will provide clear, accurate and evidence-based advice as to whether the provider continues to meet each criterion for its existing authorisation and, where relevant, meets the criteria for any extension of powers sought. The report will be sent to the provider for comment on factual accuracy.

43 Any such comments will be considered, and the report amended if necessary. The finalised report will be shared with the provider. The provider will be invited to submit an optional commentary to be considered by ACDAP with the report; this serves as the provider’s right of reply to the team's findings.

44 The team's final report and the provider's commentary, where received, will be considered by ACDAP before QAA's advice is provided to the OfS. Where the advice to the OfS is positive that the provider meets the DAPs criteria and the requirements for quality and standards, the final confirmed advice will be shared with the OfS and the provider at the same time.

45 Where the advice is negative - that is, the provider does not meet some or all of the DAPs criteria - the provider will be invited to decide if it wishes to make a written representation on specified grounds (see paragraphs 47-50) to QAA against the intended advice before it is confirmed as final and before it is provided to the OfS.

46 Reports related to positive forms of variation will be published on the QAA website after the OfS has reached its final decision on authorisation. Reports for assessments undertaken for regulatory intervention will only be published at the direction of the OfS.
Representations

47 As described above, QAA will share the findings with the provider after evidence gathering has been completed.

48 At the end of the assessment, the provider will be invited to submit an optional commentary to the findings. The commentary serves as the mechanism by which the provider can raise any concerns about the substance of the findings. Optional commentaries are distinct from representations, in that opportunities for their presentation are available at stages preceding the determination of QAA's final advice to the OfS.

49 Representations, unlike optional commentaries, are formal, written responses from providers submitted further to receipt of QAA's intended advice to the OfS before it is finalised. Representations can be submitted against the form of 'negative' advice defined in paragraph 45. The grounds for representation against QAA's intended advice to the OfS will be either that the advice is wrong or has been compromised by a serious procedural or other irregularity.

50 Representations may be submitted by a provider to QAA in accordance with the representations procedure published on QAA's website.

Assessment for OfS regulatory interventions

51 An assessment may be required to provide advice to the OfS in connection with a regulatory intervention, when the OfS is considering whether to vary or revoke a provider's DAPs authorisation (paragraph 4). In such cases, the standard assessment process, as set out in paragraphs 25-46 and Annex 1, will be followed, subject to the following changes.

Assessment visit

52 As in the standard assessment process, OfS will determine, based on its initial review, whether a team visit will be required. OfS may also specify particular areas to be addressed. For example, QAA may be asked to include in the visit a significant test, or re-testing, of the extent to which the provider satisfies relevant DAPs criteria.

53 Where the OfS is considering revoking a provider's DAPs authorisation because there are serious concerns relating to the quality and standards of provision, the QAA assessment will normally include a team visit to the provider. QAA's assessment will focus on testing the provider's ongoing compliance with the DAPs criteria and will provide evidence which OfS will use in its determination as to whether revocation of a DAPs authorisation is appropriate.

54 A visit may require more time and/or a larger team, according to the circumstances and the issues involved. QAA will discuss this with the provider at the preparatory stage. Otherwise the team visit will be conducted as in paragraphs 37-38.

Outcome of assessment

55 In its report on an assessment for a regulatory intervention, the QAA team will advise the OfS as to whether the provider continues to:

- meet the DAPs criteria within the scope of the assessment
- provide, and maintain the provision of, higher education of an appropriate quality
• apply, and maintain the application of, appropriate standards to that higher education.

56 In each case, QAA will provide the OfS with the reasons and evidence for its advice. The decision about whether the DAPs criteria are met rests with the OfS.
Annex 1: The assessment by QAA: standard process and indicative timeline

All calculations relate to the date of submission.

<table>
<thead>
<tr>
<th>Event</th>
<th>Timeline</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initiation and preparatory stage</td>
<td></td>
<td>OfS makes a referral to QAA for an assessment, specifying whether visit-based or solely desk-based</td>
</tr>
<tr>
<td></td>
<td></td>
<td>QAA briefs the provider about the assessment process</td>
</tr>
<tr>
<td></td>
<td></td>
<td>QAA forms an assessment team</td>
</tr>
<tr>
<td></td>
<td></td>
<td>QAA requests advice from UKRI where required</td>
</tr>
<tr>
<td>Submission</td>
<td>0 weeks</td>
<td>Provider uploads self-assessment and submission of initial evidence to QAA. Student submission uploaded (optional)</td>
</tr>
<tr>
<td>Desk-based assessment</td>
<td>+2 weeks</td>
<td>Assessment team conducts desk-based assessment and identifies additional evidence requests, including departmental/programme-level sampling, and whether specialist input is likely to be required</td>
</tr>
<tr>
<td>Additional evidence provided</td>
<td>+5 weeks</td>
<td>Provider uploads further evidence required</td>
</tr>
<tr>
<td>Team meeting</td>
<td>+7 weeks</td>
<td>Assessment team meets privately to discuss the desk-based assessment, and to plan the visit if required or to draw conclusions</td>
</tr>
</tbody>
</table>

If no visit required:

<table>
<thead>
<tr>
<th>Event</th>
<th>Timeline</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Draft report</td>
<td>+11 weeks</td>
<td>Draft report to provider</td>
</tr>
<tr>
<td>Provider comments</td>
<td>+12 weeks</td>
<td>Provider sends comments on factual accuracy to QAA</td>
</tr>
<tr>
<td>Final report to provider</td>
<td>+13 weeks</td>
<td>QAA provides final report to provider</td>
</tr>
<tr>
<td>Optional commentary</td>
<td>+14 weeks</td>
<td>Provider submits optional commentary to ACDAP</td>
</tr>
<tr>
<td>ACDAP</td>
<td>+15-18 weeks</td>
<td>Report and commentary considered by ACDAP</td>
</tr>
<tr>
<td>QAA advice to OfS</td>
<td>+16-19 weeks</td>
<td>QAA provides advice to OfS</td>
</tr>
<tr>
<td>Report published</td>
<td>Pending OfS decision</td>
<td>Reports published (where applicable, see paragraph 46)</td>
</tr>
</tbody>
</table>
If visit specified from the outset:

<table>
<thead>
<tr>
<th>Event</th>
<th>Duration</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Evidence</td>
<td>+ 8 weeks</td>
<td>Provider uploads any further evidence if required as identified at the team planning meeting. Subject specialist (if required) reviews evidence</td>
</tr>
<tr>
<td>Visit</td>
<td>+10 weeks</td>
<td>Team visit to provider</td>
</tr>
<tr>
<td>Draft report</td>
<td>+14 weeks</td>
<td>Draft report to provider</td>
</tr>
<tr>
<td>Provider comments</td>
<td>+15 weeks</td>
<td>Provider sends comments on factual accuracy to QAA</td>
</tr>
<tr>
<td>Final report to provider</td>
<td>+16 weeks</td>
<td>QAA provides final report to provider</td>
</tr>
<tr>
<td>Optional commentary</td>
<td>+17 weeks</td>
<td>Provider submits optional commentary to ACDAP</td>
</tr>
<tr>
<td>ACDAP</td>
<td>+18-21 weeks</td>
<td>Report and commentary considered by ACDAP</td>
</tr>
<tr>
<td>QAA advice to OfS</td>
<td>+19-22 weeks</td>
<td>QAA provides advice to OfS</td>
</tr>
<tr>
<td>Report published</td>
<td>Pending OfS decision</td>
<td>Reports published (where applicable, see paragraph 46)</td>
</tr>
</tbody>
</table>

Where OfS has specified a desk-based assessment only and later decides that a visit to the provider should be conducted, the timing for the visit may be later than +8 weeks from submission to allow the team and the provider to prepare. The timescales for report production and advice to OfS will be adjusted accordingly and follow the same intervals as outlined above.