

The Quality Assurance of Alternative Providers: A Retrospective View (2011-21)



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Executive summary

This report sets out the work undertaken by QAA to provide external oversight of the quality assurance arrangement for alternative providers between 2011-21. It looks back at the arrangements that were put in place to assure academic standards and quality and the contribution made to the enhancement of UK higher education.

The involvement of QAA came initially at the request of the Home Office (Tier 4 student visas) and later from the Department of Business Innovations which became the Department for Education (for course designation and student access to public funding). By engaging QAA to provide external oversight it meant that alternative providers would become subject to the same quality regime as universities.

During the period 2011-21, QAA undertook around 1730 reviews of providers using nine different review methods, namely:

- Review Educational Oversight (REO)
- Recognition Scheme for Educational Oversight (RSEO)
- Review for Specific Course Designation (RSCD)
- Embedded College Review for Educational Oversight (ECREO)
- Educational Oversight - Exceptional Arrangements (EOEA)
- Higher Education Review (Alternative Provider) (HER(AP))
- Higher Education Review (Plus) (HER(Plus))
- Higher Education Review (Foreign Provider) (HER(FP))
- Higher Education Review (Embedded College) (HER(EC)).

This report draws on the outcomes of these review methods by focusing on the judgements reached by the review team, the good practice and the recommendations made.

Overall, the success rate over the 10 years was good with around 90% of providers with positive outcomes. The reviews identified 1084 features of good practice and 3060 recommendations for action.

The high-level findings were as follows:

- The six aspects of provision most frequently cited in the identification of features of good practice and recommendations were: learning and teaching; enabling student development and achievement; student engagement; assessment of students and the recognition of prior learning; programme monitoring and review; and information about higher education provision.
- Of the 1084 features of good practice, 88% related to the six aspects of provision specified above. Features of good practice were notably common in relation to learning and teaching, and student development, reflecting the strengths of many alternative providers in these areas. It is noted in the report that reviews conducted under HER(AP) identified greater numbers good practice features in aspects of provision other than the six identified above, particularly about the admission of students and to the enhancement of the quality of learning opportunities.
- Of the 3060 recommendations, 82% related to the six aspects of provision specified above and were particularly common about programme monitoring and review, and to learning and teaching. The number of recommendations per review identified in HER(AP) reviews was markedly lower than in reviews conducted under REO and RSCD - part of a trend of declining numbers of recommendations per review in the period from 2013-14 to 2017-18. In particular, the frequency of recommendations

relating to academic standards, programme approval, and learning and teaching fell noticeably under HER(AP) during this period.

This report also includes the thoughts and reflections of QAA's Chief Executive, the former Deputy Chair of Associated American Study Abroad Providers (AASAP), the Chief Executive of Independent Higher Education (IHE), and the Chief Executive of the Institute of Contemporary Music Performance (ICMP). These interviews provide an insight into the impact of all the review activity - for providers and QAA.



Introduction

1 This report covers the period 2011-21 and the work conducted by QAA on the development of quality assurance for alternative providers delivering higher education. This work includes engaging with our stakeholders at the Home Office and the Department for Education to take external quality assurance forward and contributing to the development of policies to strengthen the quality of the higher education provision. The report offers the opportunity to reflect on QAA's work with alternative providers over the past 10 years and the impact it has had on the quality assurance and enhancement of alternative providers in the sector.

Background/context

2 In March 2011, the then Home Secretary, the Rt Hon Theresa May MP, expressed concerns about the numbers of international students coming to the UK on student visas to what were described as 'bogus colleges' set up to sponsor students as a backdoor means of immigration. The Government's attention followed the growth in new organisations, often private, for-profit set-ups. The Home Secretary felt there was a lack of regulation in a system allowing access to Tier 4 student visas and associated student financial assistance for alternative providers that visas provided.

3 Following this, in 2012, QAA was asked to extend its regulation of higher education institutions (HEIs) by bringing alternative providers (APs) under the external quality assurance framework that applied across the rest of the sector at that time. Alternative providers' approach to the security and maintenance of academic standards and to assuring the quality of learning opportunities would be subject to adapted versions of QAA's existing review methodologies - for example, Higher Education Review (Alternative Providers). In this way, a commitment both to enhancing the quality of UK higher education and reinforcing its reputation worldwide could be promoted across the entire higher education sector.

4 The wider context for this policy development was a three-fold rise during the previous 10 years in the number of alternative providers of higher education. As a 2017 Higher Education Policy Institute (HEPI)¹ report explained, the alternative provider sector was complex and comparatively large with hundreds of different sized organisations, offering courses from sub-degree to postgraduate level and spanning a heterogeneous array of formal organisational arrangements. While most were for-profit, many were not, and the sector offered a variety of subjects, modes of delivery and levels of experience with a small number of providers having degree awarding powers.

5 A package of measures, designed to regulate the number of student visas, included replacing the existing system of accreditation with new quality assurance requirements, tougher rules on English language competency and restrictions on post-study work and residency. As well as providing oversight, the measures were designed to protect and enhance the reputation of British education overseas. In setting out the proposals, the Home Secretary highlighted the central role to be played by QAA in the assurance of academic quality and standards. From April 2011, alternative providers (APs) applying for Highly Trusted Sponsor (HTS) status would need to meet the requirements of QAA quality review to continue operations.

6 In July 2011, Damian Green MP, Minister of State for Immigration, addressed the QAA conference in a bid to put flesh onto the bones of Theresa May's proposals. As well as

¹ www.hepi.ac.uk/2017/01/05/3762

reinforcing the main purpose of the reforms, Green praised QAA's expertise and experience in higher education, noting that the Agency's involvement in the new educational oversight requirements would 'seek to ensure that the same high standards are achieved in all institutions offering higher education, regardless of whether or not they are in receipt of public funding.' Green's emphasis was on the benefits that QAA's objective and transparent review process could bring to the sector.

7 From 2012 until the introduction of the Higher Education and Research Bill in 2016-17, QAA provided a system of external quality assurance that could be rigorously applied to AP higher education. By now, QAA's work with APs had two primary purposes. First, for the Department for Business, Innovation and Skills (BIS), and then the Department for Education, QAA review enabled designation of a provider's higher education courses for public funding. Second, it conferred HTS status - a requirement for providers wishing to recruit international students through a Tier 4 licence across the whole of the UK.

8 In this period, QAA would be able to point to its achievement in developing various methodologies for the review of APs, and in undertaking the reviews themselves which shed light on the quality of higher education across APs. In turn, this helped promote a mutually supportive relationship, with alternative providers and QAA working together in the changing regulatory and operating environment to share good practice and assure the quality of higher education.

9 QAA's role in reviewing the quality of higher education would be changed with the move to a new regulatory system from 2016. The 2017 *Higher Education and Research Act* created a new regulatory framework in England. The Act saw the establishment of a register maintained by the Office for Students (OfS). A higher education provider would now be required to register with the OfS if it wished to access public grant funding, student support funding, apply for a Tier 4 licence or apply for degree awarding powers or university title. QAA was supportive of the aims of the Act and had previously advocated for the creation of a single register for higher education providers. QAA would continue to review and monitor the quality of APs in Northern Ireland, Wales and Scotland, and English providers requiring Tier 4 licences that are not eligible to register with the OfS.

10 This report covers the timeline of events over the past 10 years, exploring the changes that occurred in the quality assurance of alternative providers. It includes a timeline of key milestones and events underpinning the quality assurance of alternative providers. It looks at the numbers behind the reviews and what they tell us about the scope, range and diversity of alternative providers operating during this time. The report also includes the outcomes from reviews, the areas of strengths and areas for improvement. There are interviews with the CEO of QAA, the Chair of the American Association of Study Abroad Providers (AASAP) and the CEO of Independent HE (IHE), providing insights and different perspectives on the development of external quality assurance in alternative providers. The report provides a comprehensive review that looks back at the evolution of quality assurance in the alternative provider sector, documenting the changes and impact it has had over time.

Timeline for the review of alternative providers

Time frame	Key developments and changes
2011-12	<ul style="list-style-type: none"> • Review for Educational Oversight (REO) begins in 2012 and ends in 2015 • Embedded College Review for Educational Oversight (ECREO) begins in 2012 and operates until 2016 • Recognition Scheme for Educational Oversight (RSEO) begins in 2012 and continues to this day • Cause for Concerns scheme begins in 2012 and continues nationwide until 2019
2013-15	<ul style="list-style-type: none"> • Review for Specific Course Designation (RSCD) begins in 2013 and continues until 2015 • REO, ECREO annual monitoring begins (2013) • Higher Education Review Plus begins in 2014 and is replaced by Higher Education Review Alternative Providers (HER (AP)) in 2015 • RSCD annual monitoring begins (2014)
2016-17	<ul style="list-style-type: none"> • Higher Education Review (Embedded Colleges) (HER (EC)) begins in 2016 replacing ECREO • Higher Education Review (Foreign Providers) (HER (FP)) begins in 2016 • Educational Oversight - Exceptional Arrangements (EOEA) begins in 2017
2018 - present	<ul style="list-style-type: none"> • The Office for Students (OfS) becomes the Educational Oversight body for providers in England in 2019 • HER (AP), HER (FP) and RSEO for Tier 4 continues for providers not eligible to register with OfS • From 2020, specific course designation continues for alternative providers in Northern Ireland, and Wales

2011-13 Review for Educational Oversight

11 Since 2011-12, QAA has provided external quality assurance of higher education delivered by alternative providers, first for the Home Office and later, in 2013, for the Department for Education (previously the Department for Business, Innovation and Skills). QAA conducted reviews of higher education to satisfy two main needs of the regulation for alternative providers: educational oversight for the ability to apply for or retain Highly Trusted Sponsor status from the Home Office; and/or a review of academic quality in order to have their higher education courses designated by the then Department for Business, Innovation and Skills for public (student loans) funding.

12 Following the announcement of changes to the student visa system by the then Home Secretary in March 2011, educational oversight by a designated body became a requirement for highly trusted sponsor status for providers wanting to recruit international students through a Tier 4 licence. QAA reviews of publicly-funded higher education institutions, including universities and further education colleges, and other degree-awarding bodies had been accepted by the Home Office as evidence in the award of sponsor status since the inception of the points-based visa system in 2008-09. QAA's recognition as a designated body for higher education providers by the then UK Border Agency (UKBA) extended its role to educational oversight of alternative providers from 2011-12. The role was further extended in 2013 following the approval of new specific course designation criteria and conditions² by the then Department for Business, Innovation and Skills when a recent, successful QAA review became a prerequisite for an application for specific course designation for new and existing providers.



² Specific course designation of a course allowed eligible English-domiciled students on that course to access loans and grants from the Student Loans Company (SLC). The specific course designation system applied to all alternative providers that were based in England, Wales, Scotland or Northern Ireland seeking specific course designation for the purposes of student support funded by the Department for Business, Innovation and Skills via SLC. Designation of courses for the purposes of student support provided by the authorities in Scotland, Northern Ireland and Wales was a matter for those authorities. Full-time and part-time undergraduate courses could be designated for student support purposes. Postgraduate courses could only be designated for Disabled Students' Allowance.

13 The alternative provider sector is diverse with a multitude of academic offers and organisational forms. To address the varying needs of the different groups of alternative providers for educational oversight and course designation, QAA developed and operated a range of review methods, reflecting this diversity as follows:

Review for Educational Oversight (REO) (2012-14) was the main review method for alternative providers and applied to independent colleges who provided higher education programmes in collaboration with awarding bodies. REO focused on the provider's management of academic standards, the management and enhancement of the quality of learning opportunities provided for students, and public information.

This approach to the review of alternative providers spawned three variants to reflect the different needs of the sector:

- **Embedded College Review for Educational Oversight (ECREO)** (2012-15)
For providers that operated networks of colleges embedded on or near the campuses of two or more UK higher education institutions.
- **Review for Specific Course Designation (RSCD)** (2013-15)
For providers who sought designation of courses for the purposes of student support.
- **Recognition Scheme for Educational Oversight (RSEO)** (2012-present)
For higher education providers based overseas that were seeking educational oversight by QAA as a requirement for Tier 4 sponsor status. It covers 'third-party' providers of short-term study abroad programmes in the UK, which form part of degree courses offered by overseas providers in their home country (study abroad providers).

14 The educational oversight review method and its variants aimed to safeguard academic standards and to contribute to the enhancement of UK higher education; promote partnership working between providers, their awarding bodies/organisations and students; and provide information that is useful to applicants, students and other interested parties. To support enhancement, QAA published examples of good practice and used case studies to highlight some of the good practice found in individual providers in the areas of quality assurance, teaching and learning, student support, resources, collaboration with external bodies and staff development.

15 To achieve these aims, REO was conducted in an open and collegial way, through discussions with staff and students and by scrutinising documents which resulted in a published report. REO covered all aspects of a provider's management of its higher education. The emphasis was on the effectiveness of the provider's procedures for managing its higher education and took full account of the varying roles of awarding bodies/organisations, ensuring that respective responsibilities were well defined. REO evaluated how a provider managed academic standards; managed and enhanced the quality of learning opportunities provided for students; and ensured the reliability and trustworthiness of the information about learning opportunities that the provider was responsible for producing. It assessed how providers carried out their delegated responsibilities within the context of their agreements with their awarding bodies/organisations.

16 The method reflected the core principles of QAA review processes - reviews were intended in part to contribute to the enhancement of UK higher education and to reinforce the reputation of UK higher education worldwide. Bringing alternative providers into the quality assurance framework filled a gap in the framework and helped to ensure that higher education, wherever it was delivered, was subject to the same common framework for the quality assurance of academic quality and standards. Common to all review methods were periodic reviews (every four years), an annual return and interim monitoring visits between reviews. Reviews were peer reviews carried out by trained staff with expertise in quality management from other higher education providers. The method was initially guided by the expectations of the Academic Infrastructure³ and/or other external reference points. From autumn 2011, it was replaced by the UK Quality Code for Higher Education (the Quality Code)⁴ with reviews conducted from 2012-13 onwards being based on the Expectations of any published section of the Quality Code. The scope of reviews included all taught higher education provision covered by the frameworks for higher education qualifications in England, Wales, Northern Ireland and Scotland, and provision which was designed to prepare students for higher education programmes (irrespective of whether the courses were designated for student support or not).

17 Reviews delivered graded judgements in three areas: academic standards, quality of learning opportunities and information (except for RSEO which delivers only two judgements on learning opportunities and information with a commentary on academic standards). They also identified good practice and made recommendations for improving the provider's management of its higher education provision which were categorised as essential, advisable or desirable, according to priority. An overview of the number of reviews conducted and their outcomes can be found in the sections below. A compulsory action plan described how the provider intended to take forward the review's findings, and the effectiveness of the action taken formed part of the evidence base of any future review activity, including the annual returns and monitoring visits. The plan also constituted a published record of the provider's commitment to developing its provision.

18 For the purposes of highly trusted sponsor status, only 'confidence' judgements⁵ in the management of academic standards, and management and enhancement of the quality of learning opportunities, and a conclusion of 'reliance' in information about learning opportunities (REO and ECREO only) were deemed as acceptable outcomes. The principles of regulation applied to alternative providers subject to the specific course designation process were designed to be consistent, as far as possible, with those applied to the then Higher Education Funding Council for England funded sector about the financial health of institutions and the academic standards and quality of their higher education provision. All

³ The Academic Infrastructure was a set of nationally-agreed reference points that informed and support the management of academic standards and quality in all higher education programmes and gave advice to institutions about setting academic standards and the management of quality. It comprised the frameworks for higher education qualifications in the various parts of the UK; the Code of practice for the assurance of academic quality and standards in higher education; subject and award benchmark statements and guidelines for preparing programme specifications.

⁴ The Quality Code served a similar purpose as the Academic Infrastructure in that it made clear what was expected of all higher education providers and provided guidance on setting and maintaining academic standards, assuring and enhancing academic quality, and providing information about higher education. Providers who offered only qualifications which were aligned to the Qualifications and Credit Framework (QCF) or the National Qualifications Framework (NQF) were judged against the use of other relevant external reference points and, where applicable, also professional, statutory and regulatory body (PSRB) reference points.

⁵ For academic standards and the quality of learning opportunities, judgements were graded and judgements of confidence, limited confidence or no confidence were made. For information about learning opportunities, judgements were that reliance can or cannot be placed on the information the provider produces for its intended audiences about the learning opportunities it offers.

providers, either with or seeking specific course designation, were expected to meet the same standard in relation to the three key criteria: quality assurance; financial sustainability, management and governance; and course eligibility. The purpose of the new financial sustainability, management and governance (FSMG) checks which QAA carried out separately to the review of quality assurance was to ensure that providers with specifically designated courses were financially viable and sustainable with a low risk of failure on financial grounds over the medium term, therefore giving students reasonable confidence that they should not be at risk of being unable to complete their course as a result of institutional failure.

19 The periodic review element of REO was operational from 2012 to 2014 when it was replaced by Higher Education Review (HER) Plus. The annual monitoring component started in 2013 and continues after the conversion to HER to the present day. ECREO reviews started in 2012 and continued until 2015 when the method was converted to a variant of Higher Education Review and became Higher Education Review (Embedded Colleges). The ECREO annual monitoring component started in 2013 and finished in 2019. RSCD was operational from 2013 to 2015 when it was converted to Higher Education Review (Alternative Providers). The annual monitoring component for RSCD started in 2014 and ended in 2019. RSEO was also introduced in 2012 and its annual monitoring component started in 2013. Both the periodic review element and the annual monitoring component of RSEO are still operational.

Annual monitoring

20 The annual return and the monitoring visit of the REO review process and its variants served as a check, in the years between a full review, on the provider's continuing management of academic standards, the management and enhancement of the quality of learning opportunities, and the information it produces about learning opportunities. The annual return and monitoring visit had a developmental aspect in supporting providers in working with the Quality Code and were an opportunity to reflect upon developments made in the management of academic standards and quality by the provider since the previous review or monitoring visit. Conclusions of the annual monitoring visit reflected the provider's continuing management of academic standards, management and enhancement of the quality of learning opportunities, and the information it produced about learning opportunities, and were graded. Academic standards and quality had to be maintained for a provider to pass the monitoring process. There was an expectation that full reviews would take place every four years, however, unsuccessful annual monitoring outcomes, significant changes in circumstances, or complaints or concerns raised about the provider could trigger a full review instead of a monitoring visit.

21 An evaluation of the first two years of annual monitoring⁶ found that most providers had made either commendable or acceptable progress in implementing their action plan, illustrating the effectiveness of risk-based quality assurance. However, only 27% of annual monitoring reports in 2013 and 31% in 2014 showed commendable progress, and therefore did not need further annual monitoring, so there was still a need to monitor most providers. The developmental aspect of annual monitoring encouraged providers to implement policies that had caused newer providers difficulties, such as student engagement and, as a result, engagement of students in quality assurance and enhancement had improved across most providers, with considerable work being undertaken to engage students effectively in shaping their learning experiences.

⁶ *Educational Oversight: A Report on the First Year of the Annual Monitoring Process in 2013 and Educational Oversight: Key Findings from Annual Monitoring Visits 2014*

22 Providers found to be making commendable progress in 2013 demonstrated that they had fully implemented and evaluated, where possible, the impact of the action plan from their previous review. In many cases, such providers had gone beyond the action plan and further enhanced their provision or their management processes. Providers with commendable progress outcomes in the second annual monitoring cycle in 2014 had built on the good practice and recommendations identified in the full review and fully utilised the key reference points for higher education, including the Quality Code. The outcomes were an improved student experience, and investment in and strategic approach to higher education. The higher education infrastructure of such providers was typically mature or nearing maturity and responsive to developments in the Quality Code. Providers making acceptable progress with their action plan were aware of where they needed to improve and demonstrated little risk to the maintenance of academic standards or quality. Providers that required improvement to make acceptable progress typically had not implemented the action plan effectively, or actions taken had not fully addressed the recommendations in their previous review report resulting in some risk to academic standards or the quality of provision. In many cases, such providers were also not engaging effectively with the Quality Code, which would have supported the development of their management processes and improved their effectiveness in managing their higher education provision.

2013-19 Higher Education Review

23 From 2013, and responding to the wishes of government to introduce a more risk-based approach to quality assurance, and to fulfil the Principles of Better Regulation of Higher Education in the UK, which were developed in 2011 by the Higher Education Better Regulation Group, QAA introduced a common review framework in England and Northern Ireland for state-funded and alternative providers. This common review framework brought any differences between review for the purposes of educational oversight and course designation into alignment. In the absence of a financial monitoring system regime in the alternative provider sector and building on the experience gained from RSCD (see above), QAA introduced a check on financial sustainability, management and governance (FSMG) as part of the process. This revised review process was called **Higher Education Review Plus** and it replaced the Review of Educational Oversight (REO) for new entrants to Educational Oversight from 2013.

24 In response to the 2014 report by the National Audit Office on financial support for students in alternative providers and following the introduction of changes to the specific course designation process by the Government in 2015 - including the requirement that all alternative providers would be subject to Higher Education Review - QAA introduced **Higher Education Review (Alternative Providers)** in 2015. It applied to all alternative providers with and without degree awarding powers from that point onward, replacing Review for Specific Course Designation and Higher Education Review Plus for the purposes of educational oversight. Higher Education Review (Alternative Providers) is still operational to date.

25 Similarly, Embedded College Review for Educational Oversight (ECREO) was migrated to Higher Education Review from 2016 with several adaptations that addressed the characteristics of ECREO providers. The new HER variant became known as **Higher Education Review (Embedded Colleges)** and operated until 2019.

26 Finally, for providers recognised by UK Visa and Immigration (UKVI) as exceptional arrangements⁷ that require educational oversight by QAA, and which were not covered by other methods such as Higher Education Review (Alternative Providers) or its variant Higher Education Review (Embedded Colleges), a discreet review method - **Higher Education Review (Exceptional Arrangements)** - was rolled out from 2017.

27 For overseas full-course providers, another HER(AP) variant - **Higher Education Review (Foreign Providers)** - was also implemented from 2017. Both variants are still operational today with providers offering only short-term study abroad courses continued to be reviewed through the Recognition Scheme for Educational Oversight.

28 The change from Review for Educational Oversight and its variants to Higher Education Review (Alternative Providers) brought alternative providers more into line with the quality assurance of publicly-funded higher education institutions and further education corporations. Like the previous method, Higher Education Review (Alternative Providers) and its variants consist of periodic reviews, an annual return and interim monitoring visits between reviews. The interval between reviews for alternative providers requiring educational oversight or specific course designation is normally four years. Like previous review methods, Higher Education Reviews (Alternative Providers) are peer reviews carried out by trained staff with expertise in quality management from other higher education providers, and review teams also include students as full members.

29 Higher Education Review (Alternative Providers) and its variants have been designed to align with the European Standards and Guidelines (ESG) for Quality Assurance in the European Higher Education Area. It has two components - the first is the Financial Sustainability Management and Governance (FSMG) check with the aim of giving students reasonable confidence that they should not be at risk of being unable to complete their course as a result of financial failure of their education provider. The FSMG check was conducted entirely separately from the review of quality assurance arrangements. The second is the review of the provider's quality assurance arrangements, which aims to inform students and the wider public whether a provider met the expectations of the higher education sector for: the setting and/or maintenance of academic standards; the provision of learning opportunities; the provision of information; and the enhancement of the quality of students' learning opportunities. Providers are judged against a set of UK Expectations about the provision of higher education contained in the UK Quality Code for Higher Education. The outcomes for Higher Education Review (Alternative Providers) and its variants are reported in published reports.

30 All programmes of study leading to awards at Levels 4-8 of national frameworks for higher education qualifications are in scope of the review. This also includes programmes governed by the Qualifications and Credit Framework and/or the National Qualifications Framework from 2013-15, and the Regulated Qualifications Framework from 2016, integrated foundation-year programmes, and programmes that students on a Tier 4 sponsor licence studied. All programmes offered by a provider are in scope of the review, whether the programmes were eligible for specific course designation or Tier 4 sponsorship.

31 From 2014, the review of quality assurance arrangements placed a greater emphasis on data analysis of student retention and progression in response to the findings

⁷ Exceptional arrangements include colleges operating as autonomous institutions with close links to a higher education institution.

of the National Audit Office report⁸ which highlighted issues with student progression and achievement in alternative provider. Higher Education Review (Alternative Providers) in 2015-16 had a core element and a thematic element. The latter was dropped for reviews from 2017 but continued in annual monitoring. The core element focuses on academic standards, quality of learning opportunities, information and enhancement, as described above and applied to all providers. The thematic element focused on an area which was regarded as particularly worthy of further analysis or enhancement among providers under review and/or the higher education sector more generally. The thematic element changed periodically and not all providers experienced the same theme. In order also to promote consistency and comparability of review findings over time, the theme was not subject to a judgement but a commentary. Themes included student involvement in quality assurance and enhancement, student employability and digital literacy. Like the previous method, Higher Education Review (Alternative Providers) and its variants led to graded judgements and other findings. Judgements were made in four areas: the setting and maintenance of threshold academic standards (or the academic standards set by degree-awarding bodies and/or other awarding organisations); the quality of students' learning opportunities; information about higher education provision; and the enhancement of students' learning opportunities. Reviews also identified features of good practice, affirmed developments or plans already in progress and made recommendations for action which indicated the urgency with which each recommendation should be addressed. Providers were also obliged to produce an action plan in consultation with students, describing how they intended to respond to those findings. These were monitored through the annual monitoring process. New applicants for educational oversight with unsatisfactory judgements required a re-review.

Monitoring

32 Following the first review, providers submit an annual return and received monitoring visits each year before the next full review. Providers who made commendable progress at the first monitoring visit were exempted from a monitoring visit the following year, unless there were material changes in circumstances, which would either extend the monitoring visit or trigger a full review. Providers who did not pass the monitoring process may request a full review to maintain educational oversight. Significant changes in circumstances, or complaints or concerns raised about the provider, may trigger a full review or partial review instead of a monitoring visit. The latter is not normally preceded by an FSMG check. A partial review is also required where an alternative provider has received a judgement of 'requires improvement to meet UK expectations' in a full review. From 2015, in response to the 2014 report of the National Audit Office on alternative providers which highlighted issues with student progression and retention, providers were required to submit in their annual return, student retention and achievement data for the last three years. From 2015-16, changes were also introduced to the annual monitoring process for alternative providers with specific course designation with all providers receiving a monitoring visit in that year replacing monitoring as primarily a desk-based activity. In addition, the annual monitoring process introduced a greater focus, through targeted themes, on the rigour of admissions, assessment and annual quality monitoring.

⁸ Investigation into financial support for students at alternative higher education providers, December 2014

2019 to the present: A new regulator for higher education

33 Higher Education Review (Alternative Providers) and its variants continued in the form described above until 2019 when the OfS became the educational oversight body for providers in England. Alternative providers who were eligible to register with them and wished to acquire or maintain Tier 4 sponsor status or required specific course designation, now had to register with the OfS for these purposes and QAA's role in educational oversight and course designation ceased for these providers. However, QAA has been recognised as a designated body for higher education providers by UK Visas and Immigration (UKVI) for providers not eligible to register with the OfS and continues to be an educational oversight body only for those providers not eligible to register with them. From 2020-21, QAA has also provided external quality assessment for alternative providers in Northern Ireland, and Wales for specific course designation with the FSMG check being carried out by the relevant authorities in the devolved nations after the quality assurance review has taken place. There are different arrangements for specific course designation in each of the devolved nations.

34 The Higher Education Review (Alternative Providers) method was adapted to reflect the changes in the regulatory landscape of higher education. The UK reference point for the method became the applicable Core and Common practices (and associated Expectations) for quality in the revised UK Quality Code for Higher Education (published in May 2018). As a result, the aims of the review of the provider's quality assurance arrangements were narrowed to focus on informing students and the wider public whether a provider meets: the expectations of the higher education sector for the setting and/or maintenance of academic standards; and the provision of learning opportunities which allow students to achieve the relevant awards and qualifications. The specific judgements on information about learning opportunities and the enhancement of students' learning opportunities were removed from the process. All programmes offered by a provider remain in scope of the review whether they are eligible for Tier 4 sponsorship or specific course designation in Northern Ireland, Scotland and Wales. The monitoring arrangements outlined above continue for the providers in the revised scheme of review. Similarly, the Recognition Scheme for Educational Oversight continues to the present day reflecting the changes in the method.

Cause for Concerns scheme

35 Accompanying the various higher education review methods for alternative providers was QAA's Concerns scheme. QAA investigated concerns raised by students, staff and other people and organisations about:

- the standards (the level of achievement a student has to reach in order to achieve a particular award or qualification)
- academic quality of higher education provision (everything that a university or college provides to ensure its students have the best possible opportunity to achieve the required standard including teaching, learning resources and academic support)
- the accuracy and completeness of the information institutions produce about their higher education provision.

36 The Concerns scheme applied where Concerns indicated serious systemic or procedural problems, where there was evidence of weaknesses that went beyond an isolated occurrence, and where the evidence suggested broader systemic failings in the management of quality and standards. All Concerns were subject to an initial inquiry and if they moved to a full investigation could be followed up through educational oversight and higher education reviews or as a separate investigatory visit.

37 All alternative providers seeking educational oversight or course designation were subject to the scheme. It operated UK-wide from 2012 to 2019 and, in that period, 84 cases were submitted. Of these, 17 went to a full investigation including a visit to the provider and meetings with staff and students. Themes emerging from these investigations include: the effectiveness of the provider's admissions procedures including the use of recruitment agents; the selection of appropriate students and the security of English language testing arrangements; the trustworthiness and reliability of information produced by the provider including information on entry requirements; the effectiveness of arrangements for student progression and achievement; the sufficiency of arrangements and resources to support students including the management of student attendance; the effective management of the assessment process including the procedures for identifying and responding to academic malpractice; and the management of the collaborative arrangements with the awarding body/organisation.

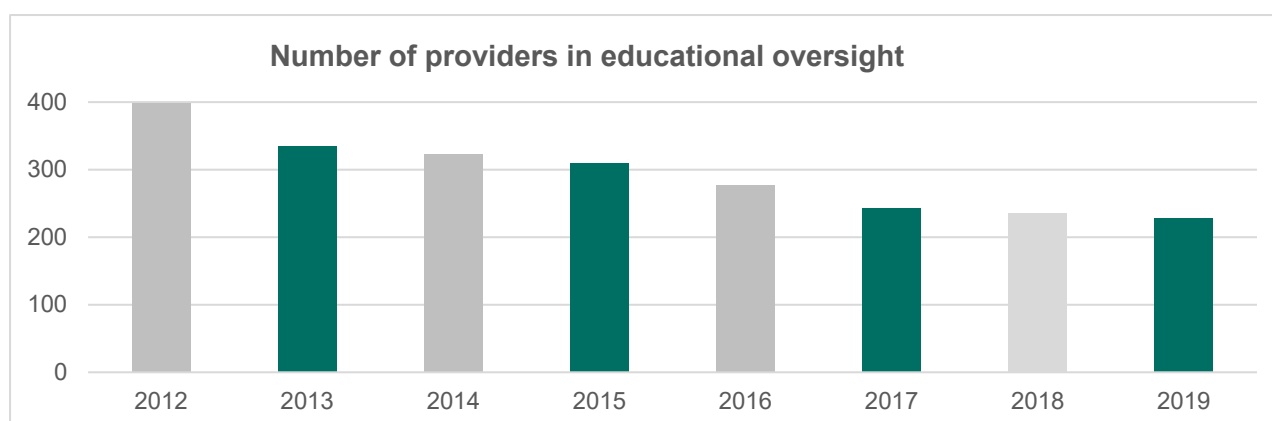
38 From 2019, there are separate Concerns schemes for England, Wales, Northern Ireland and Scotland. For England, the Concerns scheme applies to alternative providers that are unable to register with the Office for Students and are undergoing review and/or annual monitoring with QAA for educational oversight purposes.



The review of alternative providers in numbers

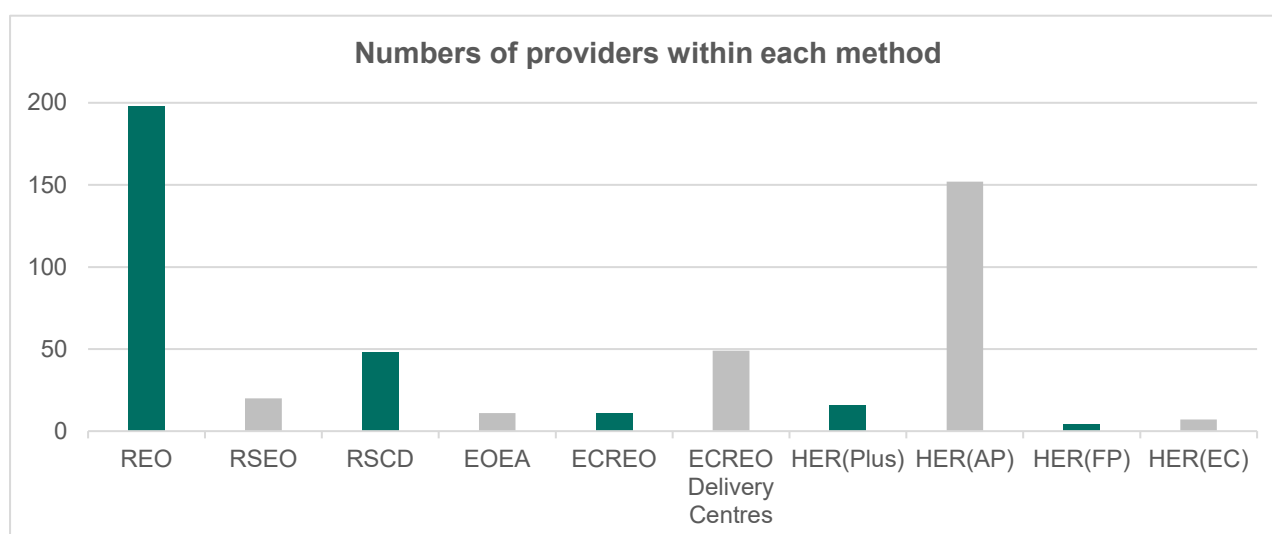
Number of providers

39 A total of 462 alternative providers applied for oversight by QAA in 2012. Several applicants subsequently withdrew or decided to transfer to Independent Schools Inspectorate (ISI) due to the low volume of higher education they delivered. Of the original applicants, 398 subsequently became subject to oversight from 2012 onwards, including the 49 delivery centres of four groups of embedded colleges. In the first year of operation, 64 such providers dropped out from oversight; the number of providers subject to oversight continued to decrease until, by 2019, only 228 - 57% of the original total - remained. It is worth noting in particular that, by the time of the introduction of Higher Education Review for alternative providers in 2015, the number of providers subject to QAA oversight had already fallen to 309, a reduction of 89 (26%) since 2012. The 170 providers who had dropped out over the eight years had either ceased to operate or had continued to do so but were no longer entitled to recruit international students or to have access to public funding



Number of providers per method

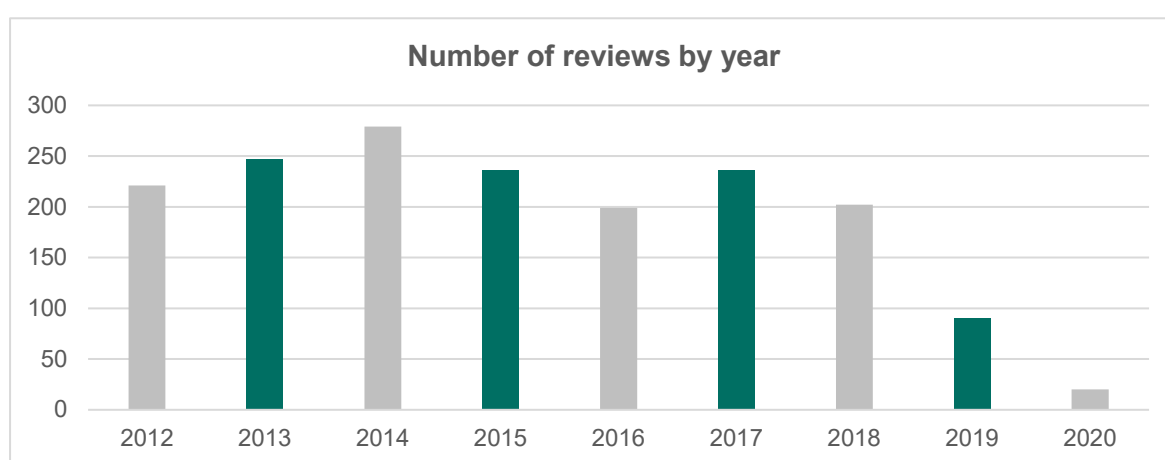
40 The principal methods, in terms of the number of providers subjected to them, were REO and HER(AP), which covered 198 and 152 providers respectively. The remaining methods, designed for oversight of specific types of provider as described in the previous section of this report, covered a total of 166 providers.



Number of reviews

41 Providers were subject to one of nine different review methods, of which five (REO, RSEO, RSCD, ECREO, EOEAE) took the form of an initial review followed by annual monitoring (AM), while the remaining four (HER(AP), HER(Plus), HER(FP) and HER (EC)) were variants of the Higher Educational Review (HER) method, with providers subject also to annual monitoring. For more detail about the differences between variants of review methods and the reasons why they changed over time, see the opening section on the timeline and significant changes.

42 A total of 1730 reviews of all types took place from 2012 to 2020. The levels of overall activity within these methods, as measured by the total number of reviews, remained roughly constant with between 200 and 280 reviews of all types per year during the period from 2012 to 2019. From the end of 2019, the number of reviews undertaken by QAA significantly reduced due to the adoption of a new approach to regulation with the formation of the Office for Students.

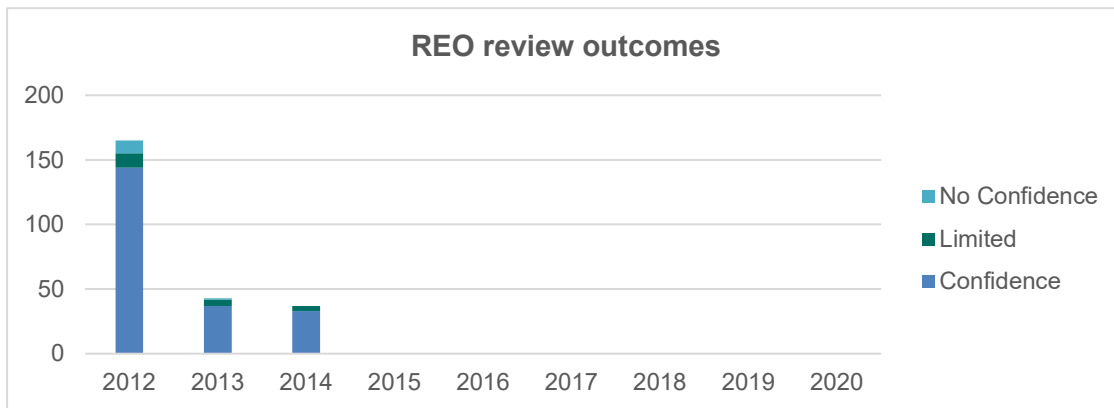


43 However, the distribution of methods varied from year to year, with REO activity predominating during the early years, and HER(AP) predominating from 2016 onwards following the outcomes of the National Audit Office report in 2014 and the requirement from 2015 that all alternative providers would be subject to Higher Education Review.

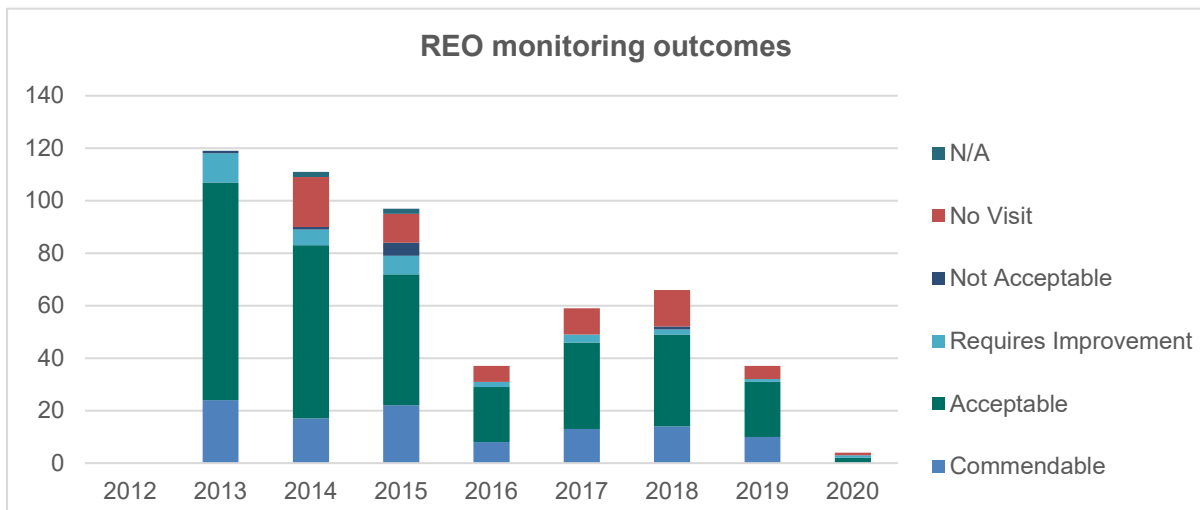
44 Additionally, providers came within the scope of QAA's Concerns scheme, with the result that several providers were subject to Concerns investigations during this period in addition to their normal review processes. A total of 84 Concerns relating to alternative providers was investigated between 2012 and 2020. For more details see paragraph 65.

Review for Educational Oversight (REO)

45 A total of 245 reviews of 198 providers took place within this method from 2012 to 2014. Of these, 214 (87%) achieved 'confidence' while 20 (8%) achieved 'limited confidence'. Areas of weakness for providers achieving only limited confidence centred on arrangements for supporting learning and teaching, and for programme monitoring and review. Subsequently, REO was largely replaced by HER(AP) from 2015 onwards.

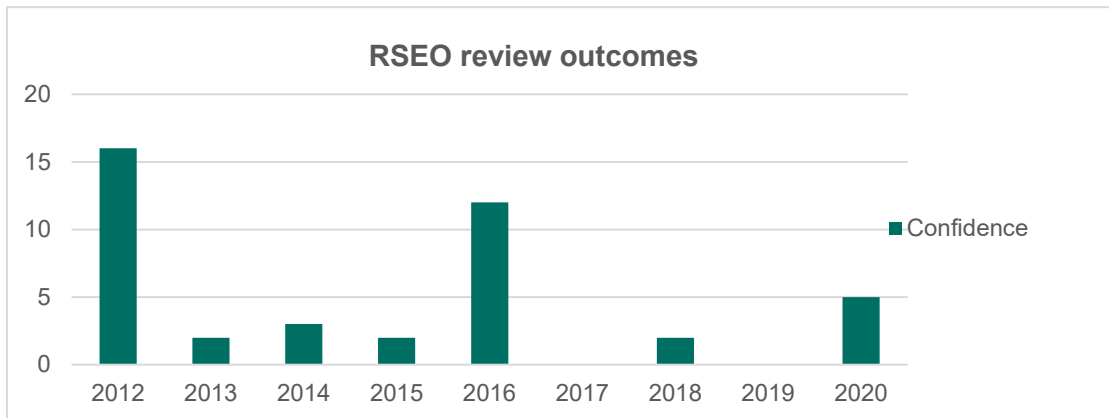


46 The outcomes of REO annual monitoring were also largely positive. Of the total of 464 monitoring visits carried out, 419 (90%) resulted in outcomes of 'commendable' or 'acceptable'. In addition, a further 66 monitoring visits were deemed to be unnecessary because the providers concerned had achieved commendable outcomes in previous years. Thus, 485 (92%) of 530 instances of annual monitoring resulted in positive outcomes.

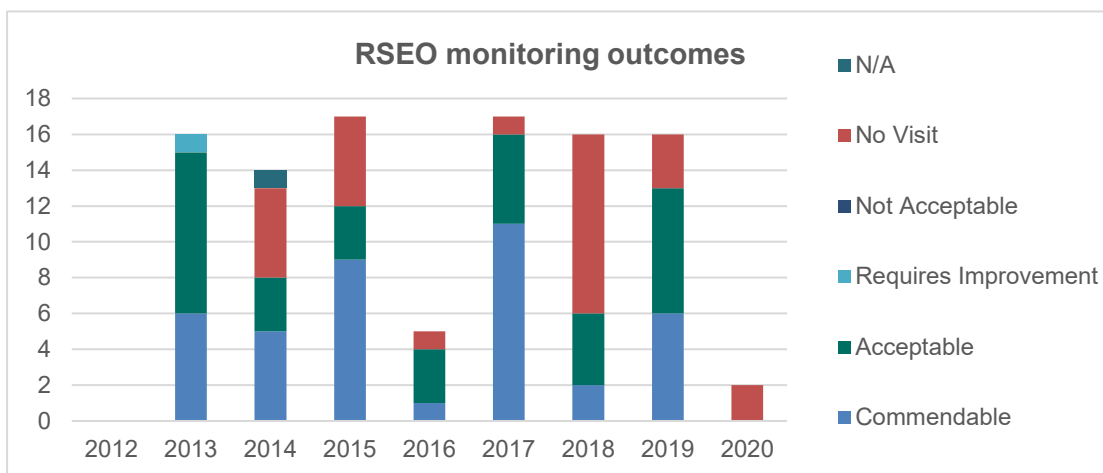


Recognition Scheme for Educational Oversight (RSEO)

47 A total of 20 providers were reviewed under RSEO from 2012 onwards during two complete four-year review cycles; thus, several providers were reviewed more than once, while full-course providers moved from RSEO to oversight under HER(FP). All 42 RSEO reviews in the period from 2012 to 2020 resulted in positive outcomes, with 'confidence' being achieved in each case.

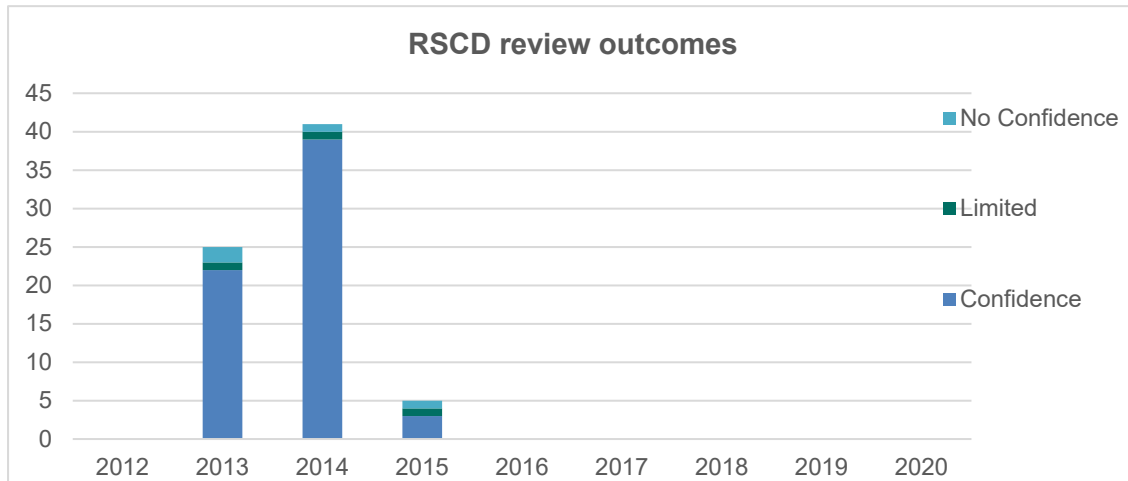


48 The outcomes of RSEO annual monitoring were also largely positive. Of the total of 76 monitoring visits carried out, 74 (97%) resulted in outcomes of 'commendable' or 'acceptable'. In addition, a further 27 monitoring visits were deemed to be unnecessary because the providers concerned had achieved commendable outcomes in previous years. Thus, 101 (98%) of 103 instances of annual monitoring resulted in positive outcomes.

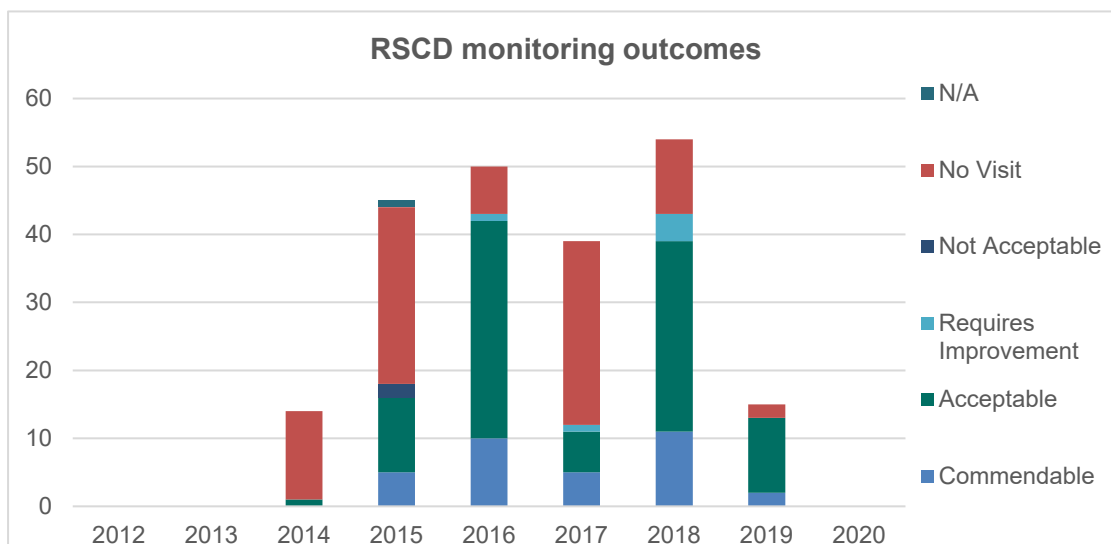


Review for Specific Course Designation (RSCD)

49 A total of 48 providers were reviewed under RSCD between 2013 and 2015, and all subsequently moved to a different form of oversight, typically HER(AP). Of the total of 71 RSCD reviews, 64 (90%) resulted in a judgement of 'confidence'.

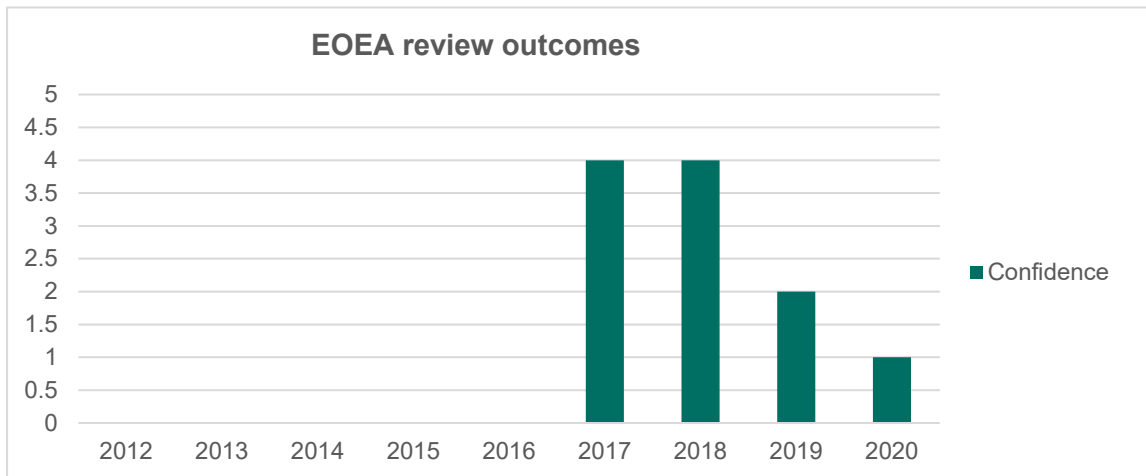


50 The outcomes of RSCD annual monitoring were also largely positive. Of the total of 131 monitoring visits carried out, 122 (93%) resulted in outcomes of 'commendable' or 'acceptable'. In addition, a further 86 monitoring visits were deemed to be unnecessary because the providers concerned had achieved commendable outcomes in previous years. Thus, 208 (96%) of 217 instances of annual monitoring resulted in positive outcomes.

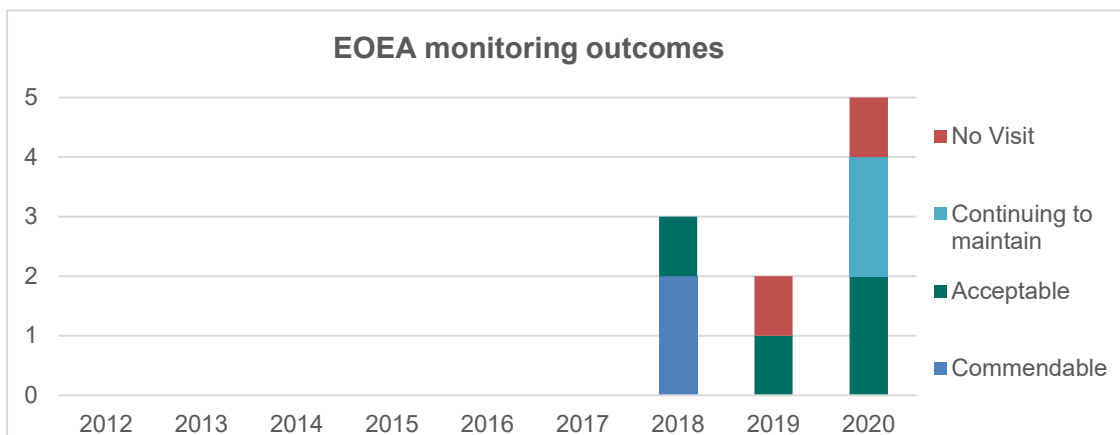


Educational Oversight - Exceptional Arrangements (EOEA)

51 A total of 11 providers were reviewed under this method between 2017 and 2020, all reviews resulting in a 'confidence' judgement.

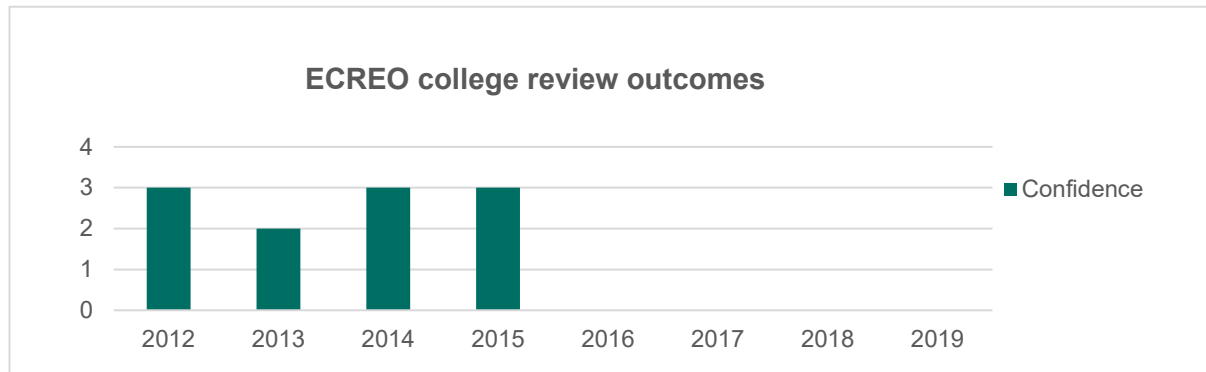


52 All 10 instances of annual monitoring also resulted in positive outcomes: six providers in England were found to be 'commendable' or 'acceptable'; two providers in Scotland were found to be 'continuing to maintain academic standards', and for two further providers, a monitoring visit was deemed to be unnecessary because the providers concerned had achieved 'commendable' outcomes in previous years.



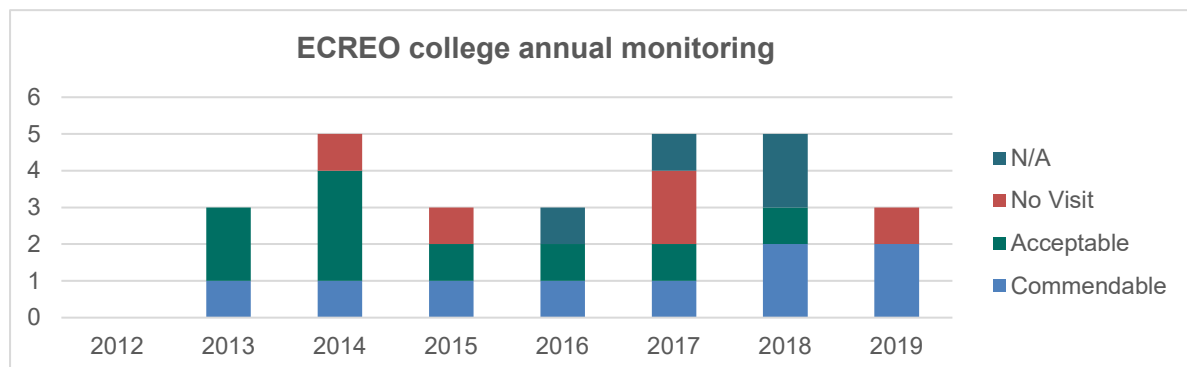
Embedded College Review for Educational Oversight (ECREO)

53 Four providers each support a group of embedded delivery centres supported by the central college of each group. Both the central college and the delivery centres were subject to review and annual monitoring under ECREO.

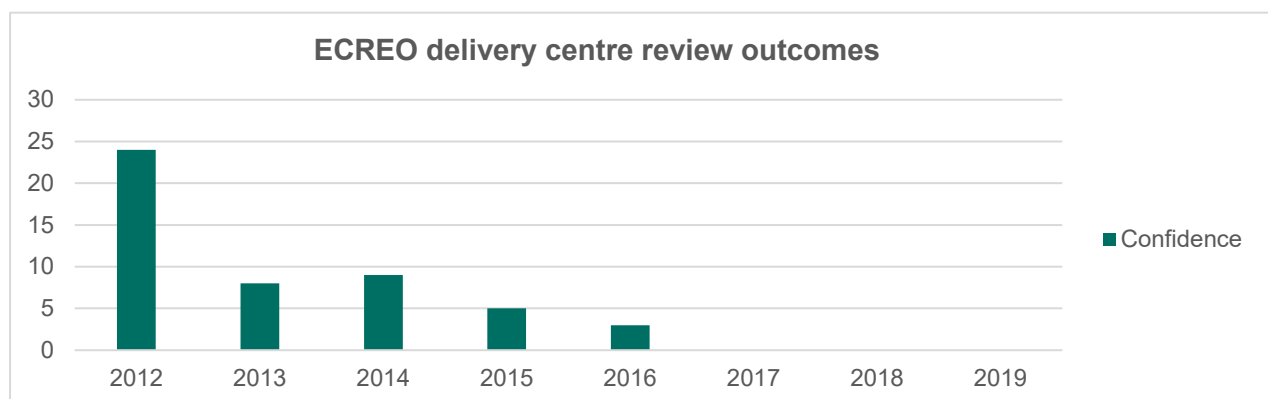


54 A total of 11 reviews of the central colleges of each group took place between 2012 and 2015, all resulting in positive outcomes.

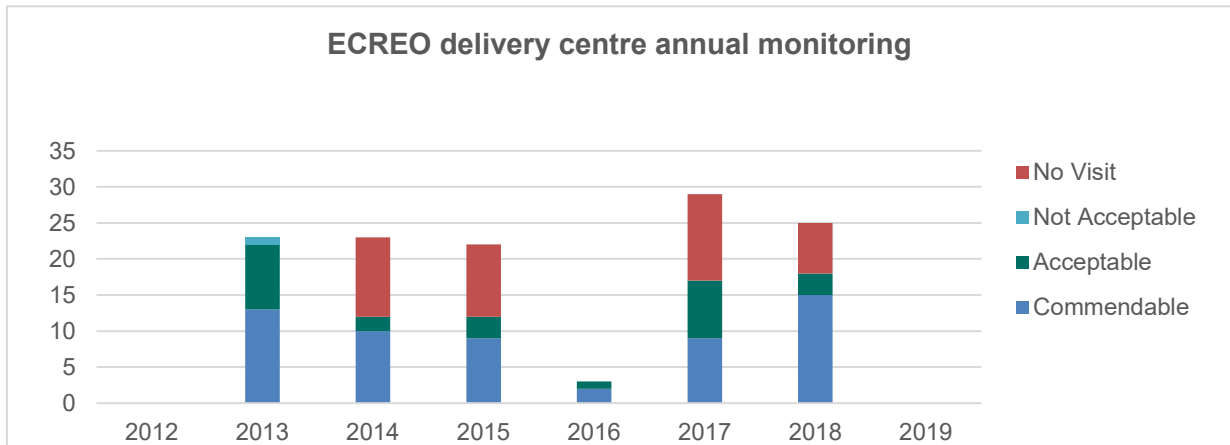
55 Annual monitoring of the central colleges also achieved positive outcomes, all 18 monitoring visits resulting in either a 'commendable' or an 'acceptable' outcome. A further five monitoring visits were deemed to be unnecessary because the providers concerned had achieved commendable outcomes in previous years.



56 The four groups between them had a total of 49 delivery centres, each typically embedded in a UK university. QAA conducted a review of each delivery centre, followed up by annual monitoring in subsequent years. The 49 reviews took place during the period from 2012 to 2016, and all resulted in positive outcomes.

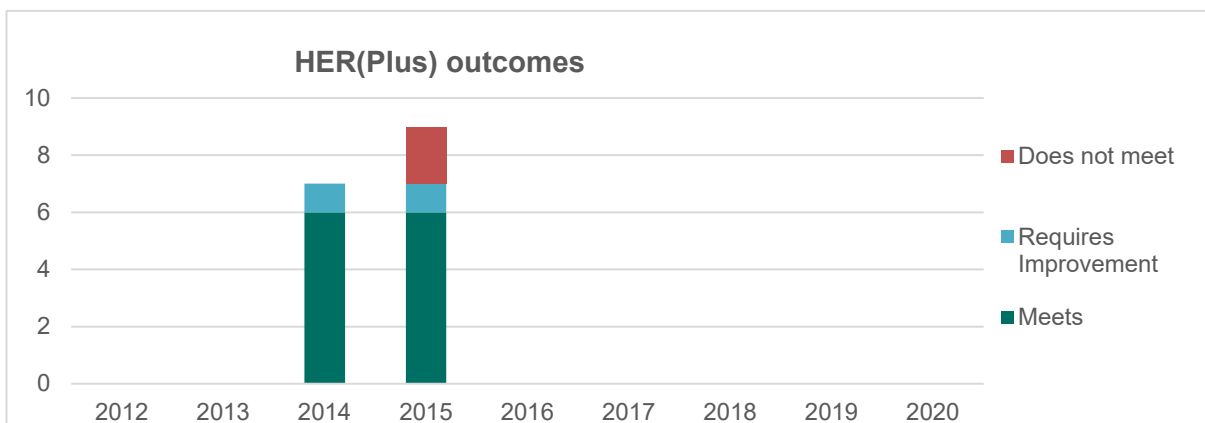


57 A total of 85 annual monitoring visits to delivery centres took place in the period from 2013 to 2018; in addition, 40 monitoring visits were deemed to be unnecessary because the delivery centres concerned had achieved commendable outcomes in previous years. Of the 85 visits, 58 (68%) resulted in a commendable outcome, while 26 (31%) resulted in an acceptable outcome. A single visit, in 2013, resulted in a negative outcome; the subsequent re-review in 2014 of the centre concerned had a positive outcome.



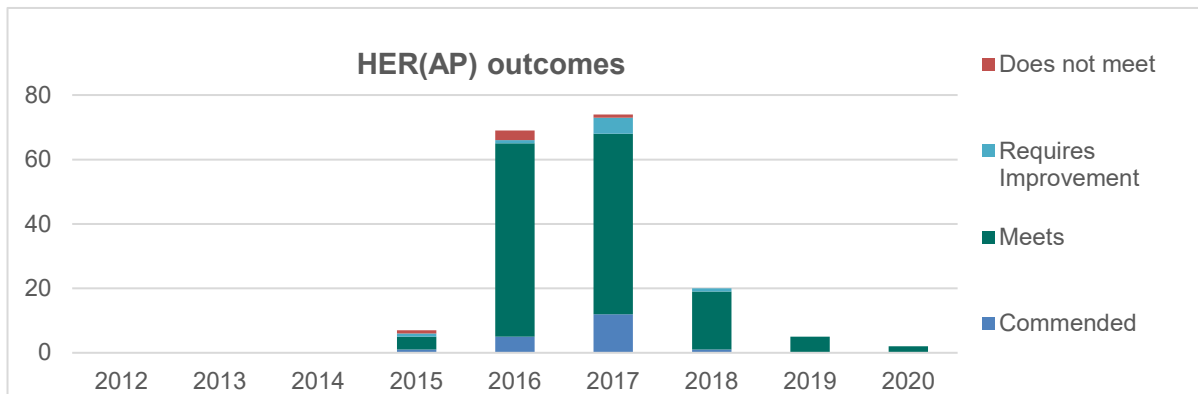
Higher Education Review (Plus)

58 In 2014 and 2015, 16 reviews were carried out under this method. Of these, 12 (75%) resulted in positive judgements of 'meets UK expectations', none resulted in a 'commendable' outcome, and four (25%) had judgements of 'requires improvement' or of 'does not meet UK expectations'. The main areas of weakness in these four cases related to the securing of academic standards, arrangements for selection and admission of students, teaching and learning, student development and information about higher education provision.



Higher Education Review (Alternative Providers) (HER(AP))

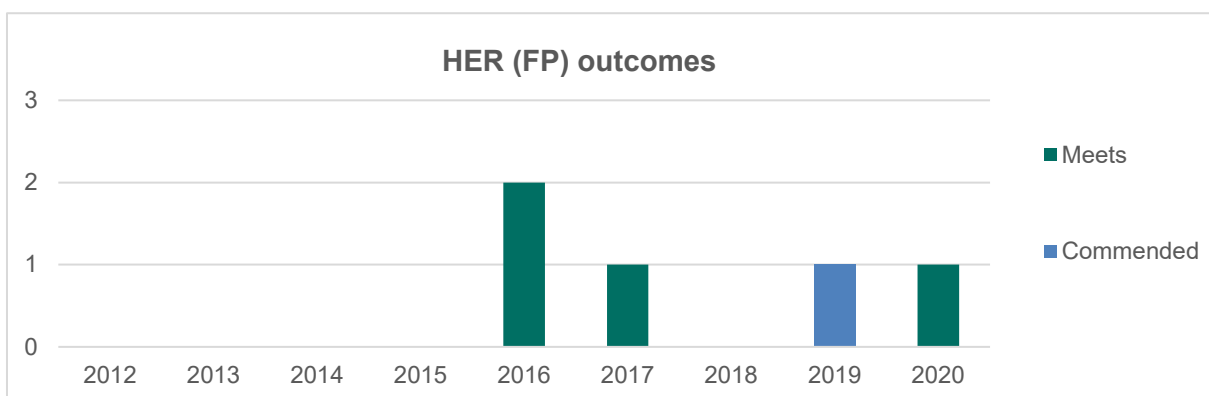
59 HER(AP) began in 2015 with reviews of seven providers, largely replacing HER(Plus). Numbers of reviews increased in subsequent years - a total of 177 reviews of 152 providers took place in the years to 2020, the majority between 2016-18. From 2018 onwards, the numbers have significantly reduced due to a change in the regulation of alternative providers. The number of reviews exceeds the number of providers because some providers failing to achieve an initial positive outcome were subsequently subject either to a further review or partial review. Most reviews resulted in positive outcomes - 164 (93%) of 177 reviews resulted in judgements of 'commended' or 'meets UK expectations'.



Higher Education Review (Foreign Providers) (HER (FP))

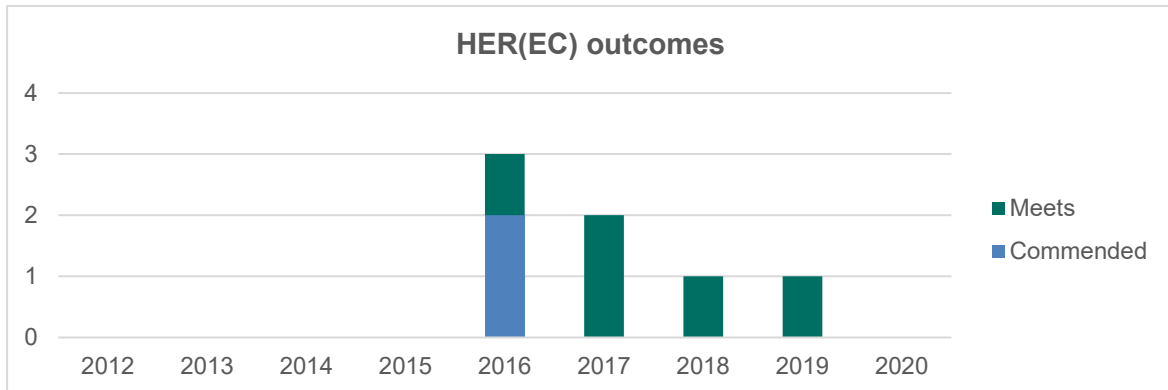
60 Oversight of the four providers subject to HER(FP) had previously taken place through RSEO. A total of five HER(FP) reviews took place from 2016 to 2020, one provider being reviewed twice.

61 Outcomes were uniformly positive, with four reviews resulting in judgements of 'meets UK expectations', and a single review with a 'commended' outcome.



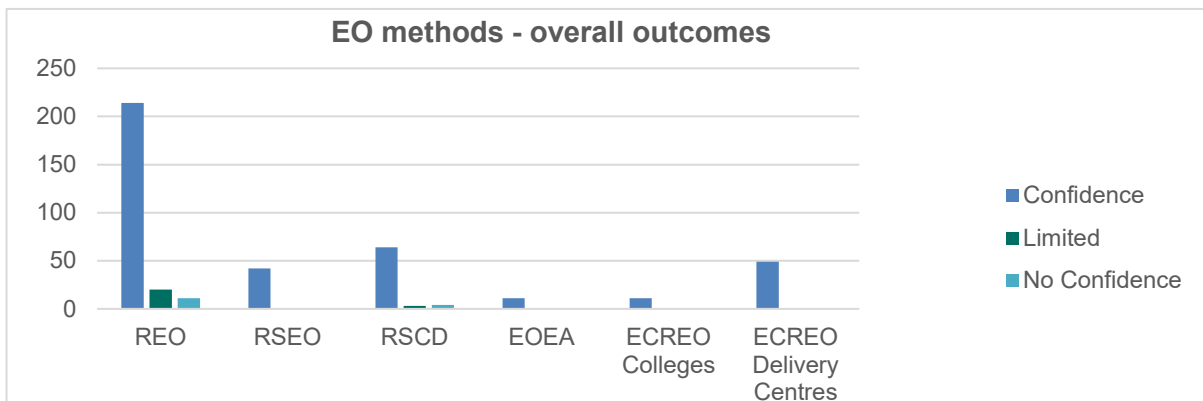
Higher Education Review (Embedded Colleges) (HER(EC))

62 This method largely replaced the Embedded College Review for Educational Oversight method in 2016. Between 2016 and 2020, seven reviews of embedded colleges from four distinct commercial groups of providers took place, all resulting in positive outcomes of 'commended' or 'meets UK expectations'.

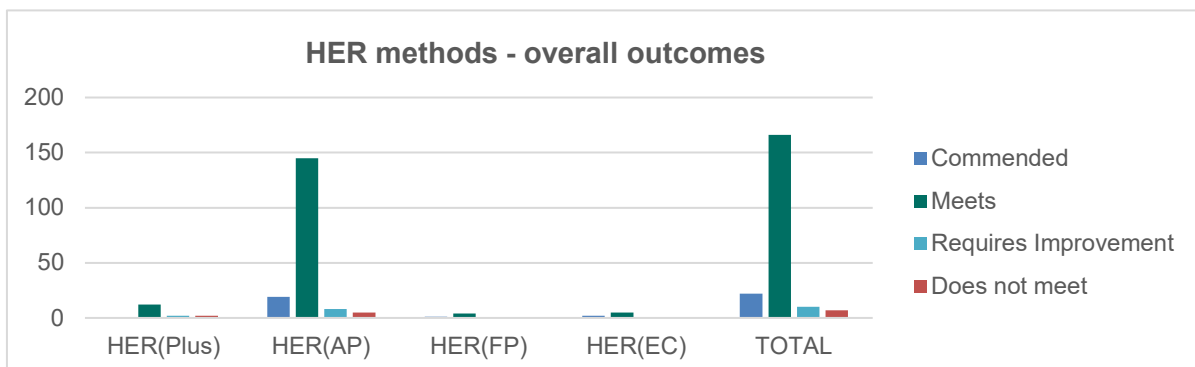


Comparison of overall outcomes for each method

63 A total of 429 reviews were carried out for the four educational oversight methods and RSCD. Of these, 391 (91%) resulted in judgements of 'confidence', including all reviews carried out under RSEO, EOEA and ECREO.

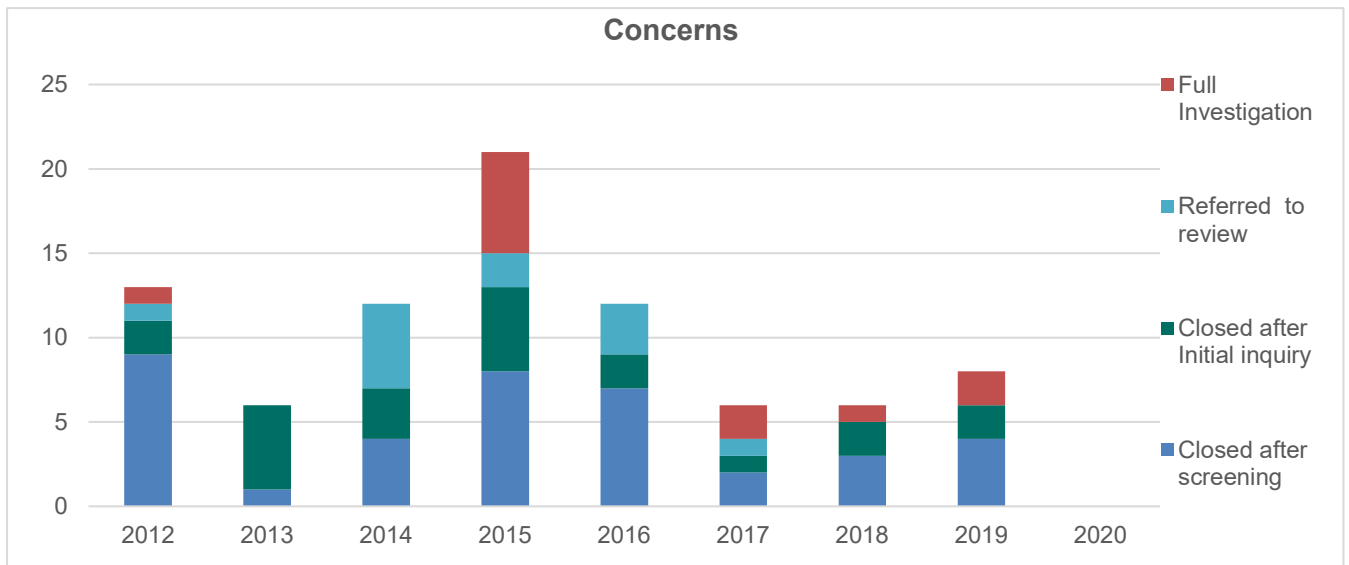


64 For HER methods, a total of 205 reviews were carried out. Of these, 188 (92%) resulted in positive judgements of 'commended' or 'meets UK expectations'.



Concerns investigations

65 From 2012 to 2019, a total of 84 cases were submitted under QAA's Concerns scheme relating to alternative providers, typically from current or former students or members of staff. Of these, 38 (45%) were closed before investigation because they did not fall within the scope of the Concerns scheme. A further 22 (26%) were closed after an initial inquiry to the provider resulted in a satisfactory response and 12 (14%) were referred for consideration at a forthcoming review of the provider concerned. The remaining 12 (14%) proceeded to a full investigation of the Concern, typically leading to an action plan produced by the provider in response to recommendations made in the report of the investigation.



Reflections on 10 years of the quality assurance of alternative providers

66 In this section of the report we bring you some of the thoughts and reflections of some key stakeholders who played a role in the development and evolution of the quality assurance of alternative providers over the past 10 years. It has been a period of great regulatory change for alternative providers and so it is of much value to hear from those involved: Douglas Blackstock - Chief Executive of QAA; Lisa George - former Deputy Chair of American Association Study Abroad Programmes (AASAP); Alex Proudfoot - Chief Executive of Independent HE (IHE); and Paul Kirkham - Chief Executive of the Institute of Contemporary Music Performance (ICMP).

Interview: Douglas Blackstock (QAA)

When QAA got tasked with developing an external quality assurance system of alternative providers, how did the providers view the prospect of being subject to QAA review?

I think it came to some as a surprise. It was quite a significant change and a move away from a system of accreditation to which they were used to working. It was bringing them into a completely new level of requirement for quality and standards that they'd never experienced before. It was also more expensive, and many felt they did not have that much of a stake in the existing system. However, the decision was taken by the Home Office because, in their eyes, the accreditation system was broken.

And because of that, did the initial reluctance to engage with it change over time?

Yes, it did over time. It was not immediately universally popular, however, very early on there was a small number of providers who saw this as an opportunity and became voluntary subscribers of QAA and volunteered for QAA reviews. For others we [started] a programme of engagement that included the two former accreditation bodies and representative bodies of religious colleges, for example, and we hosted a large conference in London attended by over 300 delegates where QAA staff, the Immigration Minister and officials from the Home Office explained what we were trying to achieve, how we were working and how the process was going to operate. Overall, if you were to reflect over the long term it raised the credibility of this part of the sector.

What do you see as the main objectives that QAA's approach to reviews of alternative providers needed to achieve?

I think the Government's view - and we shared that view - was that if it was higher education it had to meet the same standards as all higher education but the previous accreditation methods didn't test quality and standards in the way that we did for universities and further education colleges. Of course, the setting and approaches are different but academic standards are academic standards. There was a sense in government that providers were shopping around for the accreditator that was most likely to pass them. While accreditors were entirely dependent on the revenue streams from successful accreditations, QAA had both public funding and institutional subscriptions and had a 'without fear nor favour' approach to external quality assurance. Our motivation to undertake external quality assurance for alternative providers was somewhat different from the Government's. The Government was concerned that some of these providers were immigration businesses, not education businesses. Our view was that alternative providers were recruiting large numbers of international students and those students deserved to know that they were getting a higher education qualification that was at the same standard as if they had applied to a university.

What do you feel was valuable in the new review system for higher education provision that came into operation at alternative providers?

Two things happened: many providers - about 100 in the first two years - pulled out of the system quite quickly because they didn't want to change their business model. Some weren't up to scratch and some of our published reports found some poor practice. For example, the learning outcomes for a programme at one such provider included terms such as '*be able to recognise top designers*', while assessment criteria include the ability to '*identify scissors, tape measures, pins and to be able to identify the use of coloured pencils, marker pens or ink, watercolour and wax solvent crayons*'. At the other end of the spectrum, providers used the opportunity to raise their game and got familiar with the Quality Code and its Expectations and used it as a tool for enhancing their own provision. What we started finding was that there were a lot of really good alternative providers. Overall, the review system has helped to raise the standard in that part of the higher education sector and the good institutions have come through.

What challenges and opportunities did you witness in the implementation of the review processes for alternative providers?

The big challenge was that it was new and all happened at once. We received large numbers of applications for reviews from alternative providers which were primarily paper submissions. We had box loads of material and we should have gone digital then but our systems weren't quite ready. Assessing 450 plus applications with a three-week window and reaching decisions whether providers could come in the process or not, and then scheduling over a 12-month period hundreds of review visits, was also a big challenge. Overall, it was a big logistical task in an atmosphere where many of the providers didn't feel they had a say in the original decision to move them into these new arrangements.

We also face legal challenges. What we needed to understand as an agency, was that failing a review would potentially force an alternative provider to close whereas a university would have been given time by the funding council to improve. However, a Tier 4 applicant would lose their licence immediately. This brought a level of tension into the process and it also meant we rigorously had to quality control the review process and the decision-making process regarding the judgements.

Were there any opportunities for alternative providers to shape some of the processes?

No, there weren't great opportunities for providers to influence the method. The brief originated from the Home Office and latterly from the Department of Business, Innovation and Skills. The core element was compliance with the Expectations of the Quality Code, and it had to be the same as everybody else was going through, i.e. no lighter touch, no variation, the same approach a university would go through. However, we learnt over the period that some aspects of that were a bit heavy-handed for smaller providers.

We also started to discover that we were sometimes working with people where we should have been less willing to offer trust until they had a proven track record. We had one review where the provider was secretly taping the meetings, and in a small number of cases the institutional self-assessment documents were plagiarised. A lot of providers also hired consultants to produce the self-evaluations for them. In addition, the BBC Panorama programme on recruitment practices in alternative providers resulted in a change to our approach when we realised that we had to look much closer into primary evidence, i.e. student application files, assessed work and observation of teaching.

We also had to put in new procedures on conflict of interest and anti-bribery as we were concerned that undue influence could be exerted on review teams and staff. We also had a challenging situation where a provider passed a review and immediately hired a member of

staff involved in that review. For the first time, we were invited to meet with national security organisations that had concerns about some providers.

When reviewers from alternative providers became part of the process, did this make any difference to the sector's engagement with the process?

Yes, in part as it brought a greater understanding. The challenge always was for very small providers releasing somebody for a few weeks to do a review, so we didn't get as many reviewers as we would have liked. We also started to build relationships with the sector. For example, for quite some time we had an annual providers' conference; we started to provide briefings on how to apply for degree awarding powers; we also published reports and produced guidance to support the enhancement of provision. Over time we also built very strong relationships with the bodies that represent alternative providers and we now have a member of the QAA Board from an alternative provider. So, overall, we have a much stronger relationship with the sector and those that are in the system now have proven over time, that they can meet national expectations.

Looking back over the last decade, how successful, in your view, has the review system for higher education provision at alternative providers been?

We were the first people to see the need for a single register of higher education providers. We were the only body that had experience across all the providers, so we had unique expertise in that area and QAA's approach has created a culture where alternative providers are not viewed as different or delivering a lesser offer because they are meeting the same quality and standards expectations. It has identified poor practice and institutions that weren't up to scratch. That means that anyone applying to an alternative provider now has a reasonable assurance that they will be having a good experience and a worthwhile qualification. While there are differences in the higher education sector- for example, institutions with degree awarding powers and those without - there is a diversity of provision and it is widely accepted that this is a positive thing.

There was discussion within QAA at the time whether we should merge with the British Accreditation Council but we had to recognise the Government's view about the accreditation system and decided to remain a separate organisation but to take on responsibility for the review of alternative providers. This decision was not universally welcome - both internally and by representative bodies and funding councils. QAA was able to overcome this resistance by charging alternative providers the full cost of review activities, thus ensuring that reviews were not subsidised by public funding. The principle of the government policy to provide assurance about standards and quality in the interest of students was absolutely the right thing to do. While we could have operationalised it better, overall, it has been better for students, for alternative providers and better for the higher education sector.

With the Office for Students having taken on a large part of QAA's previous responsibilities for alternative providers since 2019, how do you see the agency's relationship with alternative providers develop in the short and medium-term future?

The Office for Students have referred a number of new and existing alternative providers to QAA to undertake a review. However, one of the aspects we want to strengthen is the enhancement relationships with alternative providers. We have a number of alternative providers as voluntary members who are actively engaged in discussions and we think we can tailor specific activities and events to this part of the sector and help them enhance the quality of their provision in such a way that it doesn't conflict with our review work.

Interview: Lisa George (AASAP)

How did alternative providers view the prospect of external quality assurance of alternative providers by QAA? How were alternative providers able to work with government and awarding bodies and QAA in shaping the new approach?

The study abroad sector had previously been lightly regulated so the prospect of being required to undertake what was seen as a quite extensive and cumbersome new process and without a huge amount of notice, was viewed with what one colleague described as 'trepidation at best, perhaps fear, and suspicion at worst.' As things developed, it wasn't quite as bad as we initially envisaged but it was a body blow both in terms of the scale of the task and its cost. Some of the providers were small, non-profit providers which were going to have to dig deep into their budgets to cover the costs of both the QAA subscription and their increased staff time. The process would require us to prove that we were bona fide institutions and there was initially a sense of resentment, even indignation. Our programme provision was already scrutinised within the North American higher education system where we were subject to rigorous accreditation at the institutions we were serving. So, there was a sense of surprise bordering on indignation that we had to prove ourselves to UK authorities to whom we had not previously been accountable in terms of academic standards and which were not responsible for awarding the all-important academic credit for our programmes. US institutions were our 'masters'. If premier US universities were willing to award credit for our academic provision, who was to question it? The ownership of credit by US institutions was seen as key to this argument.

The other concern for the first few years was that RSEO was not well aligned to our academic model which was based on the US system of higher education, with US time frames, course structures and approaches to assessment. The Quality Code was foreign to us and we found ourselves retrospectively tweaking some of the language and terminology of our provision to align with the Quality Code, which seemed like a somewhat contradictory way in which to apply the Code. Our programmes were well established, and we felt we were delivering a quality product. But to meet QAA requirements it was felt we had to alter the narrative.

Having said this, AASAP providers fully understood the Home Office's need to address the problem of bogus operators and charlatan programmes which devalued the international brand. AASAP had tried to persuade the Home Office that third-party study abroad providers should be treated like full AASAP members - US institutions also offering study abroad provision at remote outposts [in the UK]. We had argued that third-party study abroad providers were already accredited by multiple US bodies unlike AASAP's full members which were accredited by only one accreditation body each. Alas, our efforts to persuade the Home Office on this matter were unsuccessful. We ultimately accepted the Home Office's need to assure itself of the sector's legitimacy and to ensure that the standards and quality of our educational delivery would enhance and not detract from the British educational brand. And we reluctantly accepted that QAA educational oversight in the form of RSEO was necessary to this assurance process.

What do you feel was valuable in the new review system for higher education provision at alternative providers? Did it achieve the objectives it had aimed for? And were there any benefits for the institutions involved, their students and the UK higher education sector as a whole?

For the first few years, we struggled with the QAA review process. We found that the necessity to explain, defend and constantly improve our provision was time-consuming and expensive; it wasn't just the QAA cost but also that of staff time, which was exponential, especially for small providers.

For a long time, we struggled with the fact that the QAA model and our models were out of sync. We needed to be allowed to drop some of the language. We never got to jettison the Quality Code, but it helped enormously when it was revised and streamlined. Something we also struggled with in terms of the review model was that, while there was clearly a handbook and a general guide on to how to explain and defend ourselves, it seemed that review teams were inconsistent in the lines of enquiries they followed during the reviews. We felt it was the luck of the draw in terms of review teams' areas of concentration though we learned to adapt to these variations and to divine clues to their areas of focus from the additional evidence they requested. There is no question that the review process achieved its objectives, and it undoubtedly benefitted our students and our programmes. I think one thing in particular helped our providers and that was the emphasis on putting our students at the heart of the feedback process.

Could you say a little more about your experience of the Quality Code? Was it valuable or a necessary burden?

For us, the Quality Code was a distinctly necessary burden and I've already said that we contorted ourselves to fit within it. Having said that, most of us employed British academics who were familiar with the Quality Code and we were able to ask them to benchmark our courses against the Quality Code, level and Subject Benchmark Statements. The revised Quality Code was very helpful.

What challenges and opportunities did you witness in the implementation of the review processes for alternative providers? What was the experience of alternative providers in engaging with QAA and being reviewed?

In terms of challenges and opportunities, I've already talked about how we didn't feel initially that our systems were well aligned and that posed a challenge in terms of how we approached this. But we understood and accepted we had to go through these annual monitoring visits and then four-yearly reviews. It ceased to be a daunting, stress-inducing exercise every year. But we continued to feel that it was more time-consuming than it needed to be. To this end, we established good relationships with QAA officers and lobbied them to come and listen to our concerns. To these officers' immense credit, we found them very receptive and had some fruitful consultation meetings. Not only did they listen to us but, equally importantly, they went away and did something about it, involving us in consultations on a lighter touch approach which satisfied QAA's needs but also recognised our differences and the low risk nature of our sector. AASAP and QAA eventually achieved what one colleague called 'a more or less meeting of the minds, mutual respect and shared core values.' It took a while to get there, but once we had QAA's ear, and realised we could set up a conversation, and tell them what our problems were, they were very willing to listen, engage and act on our concerns. It did not dramatically change things. It was still a very time-consuming process, we still had to explain and defend ourselves, but we felt we had been listened to, adaptations had been made, and we no longer resented the time it was taking. We finally felt we were moving in the same direction.

What sort of changes were of value?

The move to a desk-based analysis option was very welcome and, we felt, a natural consequence of our requesting a lighter touch approach. Also, QAA's move to stating that the achievement of a 'commendable' outcome one year might dispense with the need for a monitoring visit in the following year was welcome.

Furthermore, previously the handbook seemed to have been written for a wide range of alternative providers. Following our consultations, QAA started directly referencing study abroad programmes and the agreements with the US partner universities and colleges, acknowledging to a greater extent that they were our masters. We felt there was finally an acceptance that we had to respond to US institutional requirements as much as to those of QAA and the wider English higher education system. The handbook became more specifically directed at our sector.

How successful, in your view, has the review system for higher education provision at alternative providers been?

I can perhaps best answer this question by referencing OfS and the threat we were under to be brought within their oversight umbrella. Ironically, having complained for a long time about having to be reviewed by QAA, when OfS was set up it became clear that we would have to completely rewrite the script for OfS in a very major way. As a consequence, AASAP started lobbying to stay with QAA, the devil we knew, because we felt all the work to help QAA better understand us, to achieve this meeting of the minds, would be lost with a move to OfS. In the end, based primarily on the fact that academic credit is awarded by US institutions, we were allowed to remain under the purview of QAA.

We ultimately found the relationship with QAA highly successful and, more importantly, we found the review process beneficial to our programmes and to our students, especially after it had been tailored to our sector. We spent more time eliciting our students' feedback, and we acted on it because QAA was very good at requiring us to show the evidence. The review process imposed an external pressure to make sure we were doing things well and to identify those areas where we could do things better. Every provider put new processes in place, particularly in respect of feedback and enhancement, and that wouldn't have happened, or certainly not to the same extent, without QAA. Our [students] and US institutions benefitted because, while I'm not sure our academic courses were materially changed, the processes of evaluation and listening to the student voice were certainly improved and strengthened.

We found QAA reviewers to be conscientious colleagues who took what we were doing, and their obligations to fairly assess us, very seriously. We always felt reviews were conducted professionally and comprehensively. QAA applied the same seriousness and thoroughness to the review process that we were expected to demonstrate.

Anything else you want to say?

At the start, we struggled with the fact that the QAA model and our models were out of sync. However, it ultimately turned into a very positive relationship and experience, which was hugely beneficial to our providers, students and stakeholders. The negativity at the beginning evolved to great positivity by the end.

Interview: Alex Proudfoot (IHE)

How did alternative providers view the prospect of external quality assurance of alternative providers by QAA?

Firstly, it is important to get the terminology correct and refer to the independent sector rather than 'alternative providers'. The UK's independent higher education sector has been established for a long time, encompassing a wide range of distinctive providers with different missions but with a shared sense of identity and a common focus on innovation, widening access and employment. What has always unified these diverse providers is the way in which they developed independent of any public funding, leading to a fiercely independent ethos and a real responsiveness to the needs of their students and the particular industries or communities they served.

While the Higher Education and Research Act of 2017 ended, to some extent, the stark divide between publicly funded and private providers with its creation of a level playing field, particularly with regard to quality assurance, the independent sector still retains some distinctive needs in terms of the journey to broad regulatory equivalence with their focus in specialist areas, working with industry and the focus on the student experience.

What do you feel was valuable in the new review system for higher education provision at alternative providers?

The initial response from independent providers to the changes was quite negative, as it was seen as an imposition by government and highly disruptive. Since 2007, independent providers in the UK had been required to seek accreditation for student visa purposes and they had become accustomed to that system, which had been in place on a voluntary basis since the 1980s. So, when in 2011 the Home Secretary announced this quite radical change, it was negatively viewed with some suspicion, and hence a scepticism about the role of QAA. The overriding impression was that the changes were being driven not by educational but by immigration concerns. It was only when reviews started and had become well embedded that this scepticism was gradually replaced by a realisation that the discipline of the review process was helping many providers to bring about change and improvements in their own internal quality assurance processes.

When the new external arrangements were introduced, there was an ambitious timetable which meant that QAA had to adapt an existing review method which may not have been the ideal fit in every area, but this was addressed over time. Generally, independent providers began to recognise that they had learnt a lot from the QAA process, and the gradual convergence of external quality assurance processes with the way universities had been reviewed, was seen as a particular positive.

What do you think of QAA's approach to reviews of alternative providers?

To be honest, it worked better for some institutions than others. There was a culture shock for many of the most vocational institutions, who had always focused their provision on preparing students for particular careers - this was professional training first and foremost, and some would not have considered themselves to be 'higher education' originally at all. The change in external quality assurance, however, accelerated changes already taking place in the market, a kind of demand-led evolution in their provision and identity towards being more clearly higher education, but in a broader sense and sitting in an increasingly diverse sector.

The review process helped focus the minds of some providers in particular who, up until then, had been ambivalent about portraying themselves as higher education institutions because they really saw their unique offer to students as being centred on practical and technical skills and knowledge, and less on academic research or abstract reasoning. As a consequence, they found some of the new elements of reviews such as the extensive reliance on critical self-evaluation, which were considered closer to an academic environment than the practical and technical environment, as a challenge because it was a different way of operating, and not always seen as showing off their strengths. I distinctly remember the howls of dismay from a number of very highly thought of providers at learning that the QAA review team did not want even to set foot in their bespoke learning facilities - the provider's pride and joy - let alone observe any teaching take place. This was an entirely different model from the inspection-led process they had been used to.

Some aspects of the QAA review process appeared more onerous, such as the amount of documentation associated with preparing for a QAA review because the previous accreditation regime had been rather lighter in the amount of paperwork required to be submitted in preparation for inspection.

What challenges and opportunities did you witness in the implementation of the review processes for alternative providers?

The move to the UK Quality Code was seen as helpful by many providers and an improvement on the academic infrastructure which pre-dated it. To some extent, the last 10 years has been the story of convergence whereby the independent higher education sector became more aligned with the publicly-funded sector in quality assurance terms. Most independent providers were keen to go on that journey but, in the process, some needed more guidance to help them understand and help them meet the expectations, because they had come from a different background.

While at the beginning, some providers struggled to understand how to operationalise the Quality Code, with time the end benefits could be seen, including a better understanding between QAA and the providers around expectations. Another initial challenge which was overcome, was a perception among independent providers that QAA reviewers did not understand them or their way of operating. The recruitment of QAA reviewers from the independent higher education sector was critical in addressing this and was widely welcomed as a positive move, as there developed a feeling that review teams were better able to understand the context in which independent providers were operating.

How successful, in your view, has the review system for higher education provision at alternative providers been?

I think it has been a success both in terms of the wider policy agenda and in realising tangible improvements in the governance and management of quality at independent providers. While not all of the providers who were operating 10 years ago have made it through what has been a period of significant upheaval, intense challenge and increased scrutiny, the ones that have are notably stronger, more efficient and more resilient in adjusting to rapid change and uncertainty - a useful skill to have over the past year in particular. I believe that - in no small part due to the support and advocacy of QAA, as a trusted and objective voice in higher education - independent providers today are better able to meet the needs of students and the expectations of government, and their distinct role is better understood across the sector. Certainly, without going through two cycles of the QAA review process, it would be far more difficult for many providers to navigate successfully the new OfS regulatory system.

Going through the QAA review process has also had a significant impact in the area of student engagement. Operating as they did in the private sector, and serving mostly self-funding students, the student experience, customer service and meeting the needs of students had always been central to independent providers. The relatively small size of most of them meant that communications were usually good, with managers and even college principals themselves, easily accessible to students. Nevertheless, QAA reviews forced providers to think of the student voice in a more structured sense, and while it hasn't always led to a radical overhaul of practices it has helped providers to formalise and reflect the student voice in their governance structures.

Anything else you want to tell us that you've not had an opportunity?

Overall, I would say the engagement with QAA has been constructive and very worthwhile and helped many smaller providers to build more rigour into their quality assurance processes. The outcomes and profile of the review process has also helped change public profile/perception of independent providers and helped shift views away from what was sometimes a negative view of private companies operating in education into something altogether more balanced and positive.

Interview: Paul Kirkham (ICMP)

How did alternative providers view the prospect of external quality assurance of alternative providers by QAA?

In 2009-10, policy changes were happening in HE with a new incoming Conservative government and we were keen to take advantage and engage with the mainstream sector as a means of improving the quality of our provision and potentially accessing other funding mechanisms for teaching and research. The alternative provider sector at that time was not particularly well regulated and so we saw the entry of QAA into the regulatory world of alternative providers as an opportunity.

In 2011, we took a different route to other providers by becoming a subscriber to QAA despite questions from others about becoming too closely aligned with what at the time was a new regulatory approach and likely to produce both an additional burden and increased risk. However, we saw it as an opportunity to learn and get closer to the mainstream sector. Initially, this resulted in going through an institutional review which, on reflection, did present some significant risk around access to and maintaining a Tier 4 license. As the government tightened the regulatory requirements, the consequences of not getting a positive review outcome would have been detrimental to us and our development. What we had understood to be a developmental process quickly became a regulatory requirement and any outcome below the pass threshold had the potential for long-term negative consequences.

What do you feel was valuable in the new review system for higher education provision at alternative providers?

Despite this risk, we wanted to join the mainstream HE sector and subject ourselves to the same degree of scrutiny, especially in terms of quality assurance. Despite some reservations and risks, we felt there were distinct benefits to us as an institution looking to engage more directly with mainstream higher education, including opening up conversations with the funding body and various government departments. And despite some initial challenges, there is no doubt that our experience of QAA reviews provided us with a clear roadmap which has enabled us to develop in a direction that means we have been able to engage more closely with the new regulatory world and prepare for degree awarding powers and university title.

Even though there were challenges with our first review in 2012, we used the outcomes to restructure the institution and put in place the infrastructure - such as an Academic Board and a range of sub-committees, and greater externality - necessary to meet the expectations of external review. So, by time we did our next review in 2015 - which had become the 'Higher Education Review' or HER - we had everything in place to be successful. The move to HER also included annual monitoring which offered useful pointers to provide confirmation that, as an institution, we were heading in the right direction.

However, to achieve this we had to create effectively a 'mirror image' of the existing sector in the way that we operated, because that is what was expected by reviewers. One significant consequence of this is that innovation has been effectively stymied and the process became a barrier to change in the sector.

What do you think of QAA's approach to reviews of alternative providers?

The QAA approach did help us better understand and formalise areas such as the student voice, although in smaller providers the benefits are perhaps more limited because of the scale and the limited resources available, so inevitably it becomes a more 'managed' process and something of a tick-box exercise. The principle of student engagement is right and QAA review helped us to think and reflect on the best way of engaging with students. QAA's approach was also very helpful for establishing credible structures to enable debate around what was required in practice. However, the main issue with QAA's approach over time is that it did not differentiate sufficiently between providers, it did not foster a culture of innovation and change, and that it needed to change.

Perhaps one of the biggest challenges was that the reviewers came from the established sector and therefore expected to see the structures and approaches that they were familiar with, and often didn't understand that things could be done differently. This is partly why I believe that an outcomes-based model is better suited to move the sector forward and overcome the prevalent inertia to change. Another frustration was that QAA reviewers did not go into the classroom and see for themselves, what was often, the great work going on in the process of teaching and learning itself. Also, the lengthy time scales between notice and review was also a problem because it enabled the process to be too closely managed.

It was of its time, and the process-driven model is now being replaced by an outcomes-based model which, in my view, has the potential to enable a provider to adopt different approaches to achieving good outcomes based on, for example, different organisational structures and approaches to quality assurance.

What challenges and opportunities did you witness in the implementation of the review processes for alternative providers?

The opportunities were clear for us in that we wanted to become part of the sector, subject to the same range of both regulation and benefits. The simple outcome is that we have been able to create something that has enabled us to meet all regulatory requirements over many years and now we are in a position to apply for our own degree awarding powers. The downside of this is that we have effectively replicated the existing system, and we still harbour ambition to drive more innovation and change that will benefit students, taxpayers and employers alike.

How successful, in your view, has the review system for higher education provision at alternative providers been?

It was very useful for providers like us to develop our provision, including student engagement and quality assurance. It has given us an entry point to the mainstream and

enhanced our credibility with key stakeholders while enabling us to meet existing regulatory requirements. However, as I have said, the approach has led to copying traditional HE. We are now at a turning point and we must learn the lessons of the past; there has to be a new approach which embraces changes such as credit-based financing and a review of the traditional approach to regulatory and quality metrics, enabling new and innovative providers to break the traditional, three-year, on-campus degree apart and create new models of delivery of a range of different HE 'products'.

Analysis of review outcomes

Thematic analysis

67 Overall judgements about the standards and quality of the provision under review were typically accompanied by the identification of features of good practice within that provision and of recommendations to the provider about academic standards and/or quality. The following analysis relates to features of good practice and recommendations arising from all but one of the review methods under consideration in this report. The exception is RSEO which has been omitted from consideration in this section because of the exceptional nature of the provision reviewed under this method, which comprised part-time 'study abroad' programmes delivered to non-UK students leading to credit with non-UK awarding bodies. A total of 514 reviews were carried out under remaining methods - namely REO, RSCD, HER(AP), HER(Plus) and HER(FP).

68 Annual monitoring visits did not seek to identify features of good practice or to make recommendations, and hence the outcomes of annual monitoring are not included in this analysis.

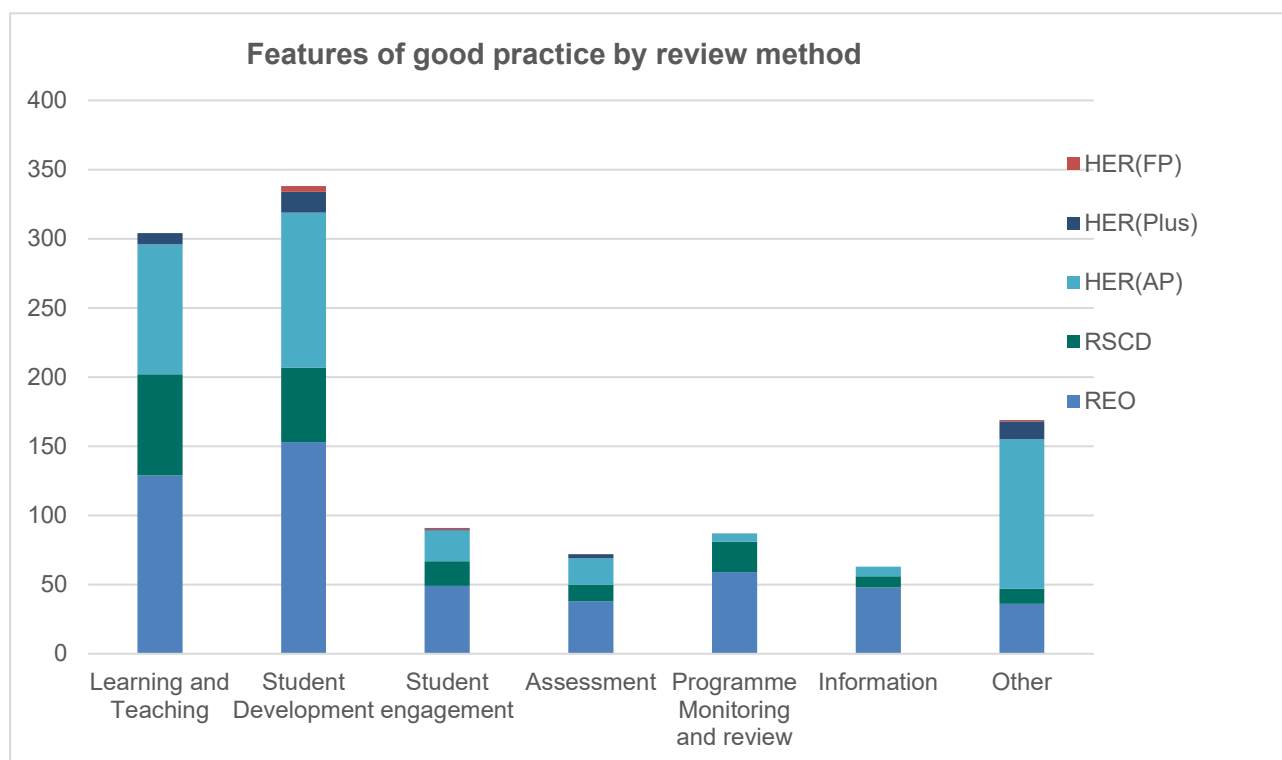
69 Additionally, reviews conducted under one of the HER methods were able to make affirmations of actions already being taken by the provider to secure academic standards or to improve the quality of its educational provision.

70 Features of good practice, recommendations and affirmations were categorised about several specific aspects of provision corresponding to the various chapters of the UK Quality Code for Higher Education (the Quality Code) in place at the time. The aspects of provision most frequently cited, and hence of most relevance to this report, relate to six of the 16 chapters of the Quality Code, as follows.

Aspects of provision most frequently cited	Quality Code Chapter
Learning and teaching	B3
Enabling student development and achievement	B4
Student engagement	B5
Assessment of students and the recognition of prior learning	B6
Programme monitoring and review	B8
Information about higher education provision	Part C

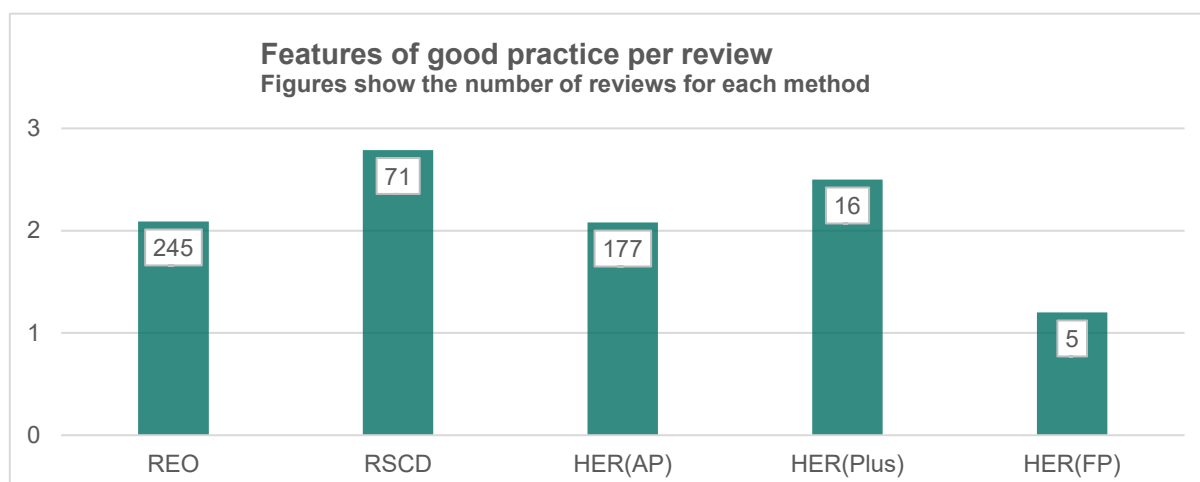
Features of good practice

71 A total of 1084 features of good practice were identified in the 514 reviews under consideration, distributed between the various methods as shown. Of these, 955 (88%) related to the six aspects of provision specified above. Features of good practice were notably common about learning and teaching, and student development, reflecting the strengths of many alternative providers in these areas.



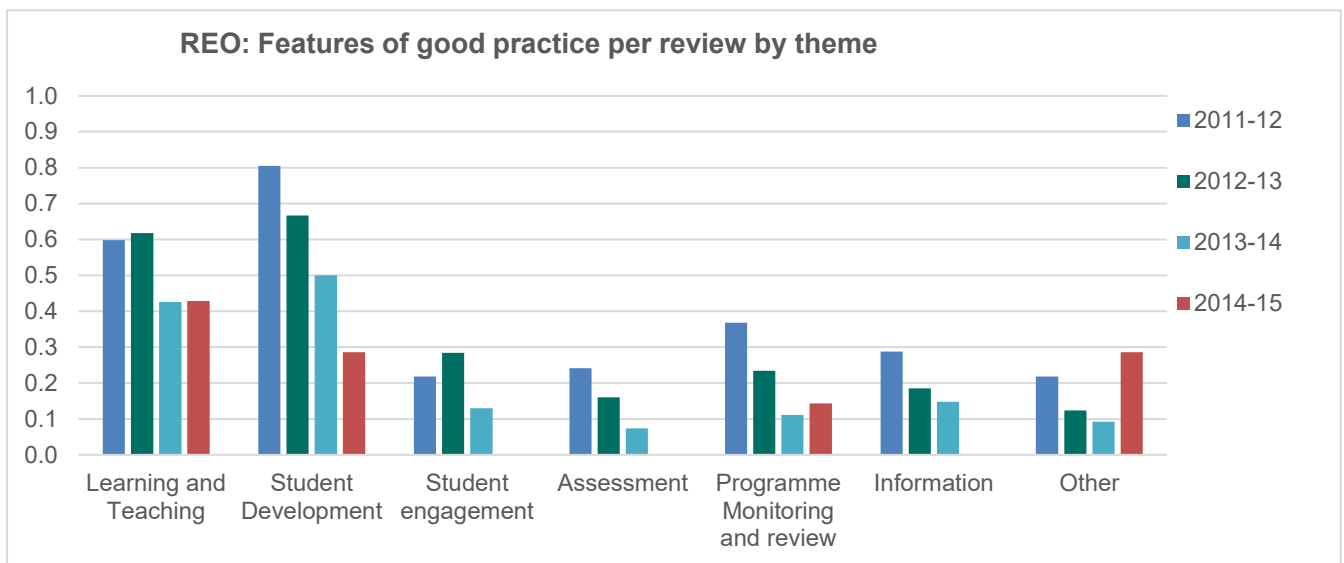
72 The mean number of features of good practice identified per review was roughly similar across all methods at between two and three reviews, except for HER(FP), whose figure is based on only a small number (five) of reviews.

73 Good practice which was identified about teaching and learning, covered a wide variety of aspects of provision intended to enable students to develop as independent learners. Features of good practice relating to enabling students' development and achievement related mostly to levels of academic and welfare support available to students, and to the learning environment offered by the provider.

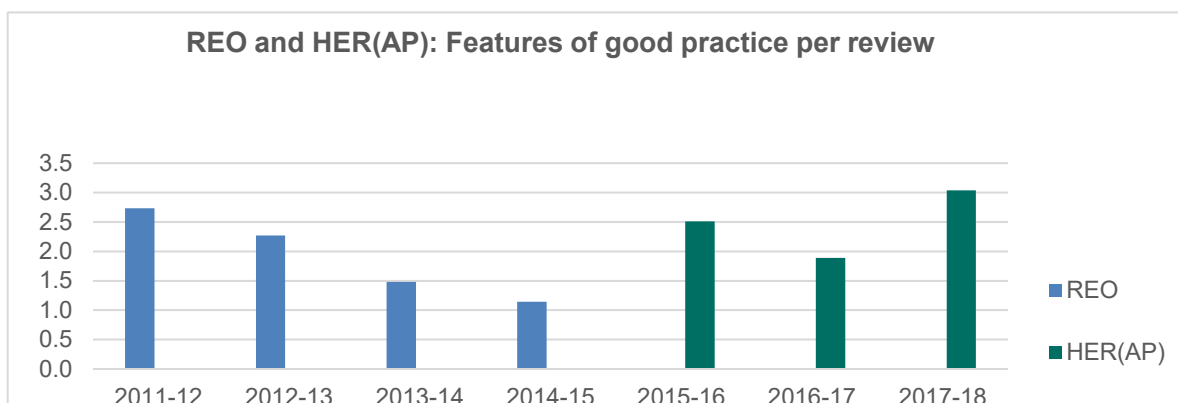


74 Within the HER(AP) method, there was a higher number of features of good practice classified here only as 'Other' than for other methods. These related mostly to the recruitment, selection and admission of students, and to the steps being taken by providers to enhance the quality of learning opportunities.

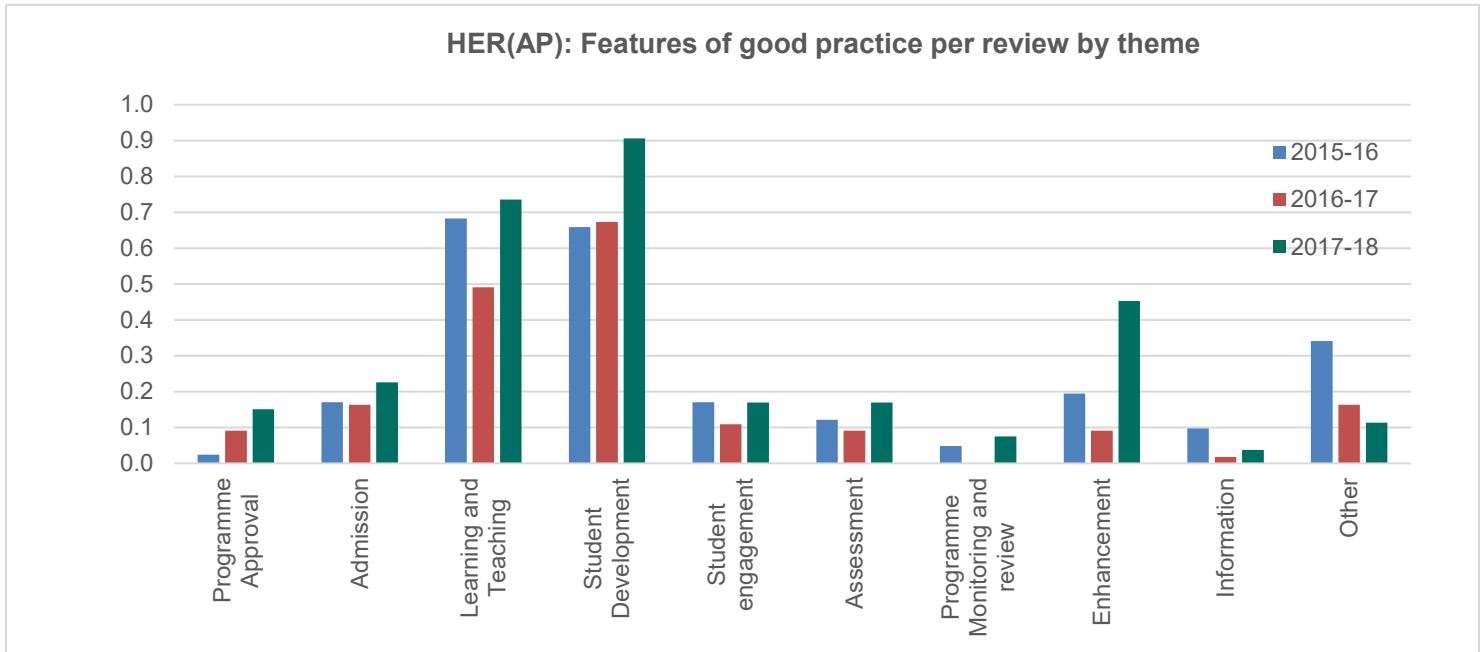
75 However, these figures mask trends in the identification of features of good practice over time. In REO itself, the frequency of occurrence of features of good practice decreased over the four-year period during which this method was in use. There were reductions in the frequency of features of good practice relating to the enabling of student development and achievement, to the assessment of students and the recognition of prior learning, to programme monitoring and review, and to information about higher education provision. The reasons for this are unclear and may relate to the nature of the providers coming forward for review later in the four-year cycle, or to the changing expectations of reviewers during that period.



76 Following the introduction of universal use of Higher Education Review for alternative providers in 2015, HER(AP) replaced REO as the predominant review method. There was subsequently a marked increase in the frequency of occurrence of features of good practice after the migration to HER(AP), as shown. The reasons for this change are unclear. Possible factors are the nature of the HER(AP) method - for instance, its use of reviewers drawn from a different cohort, and its explicit inclusion of consideration of how the provider is enhancing the quality of students' learning opportunities, or the possibility of sector-wide learning deriving from the disseminated experience of previous reviews through published reports.

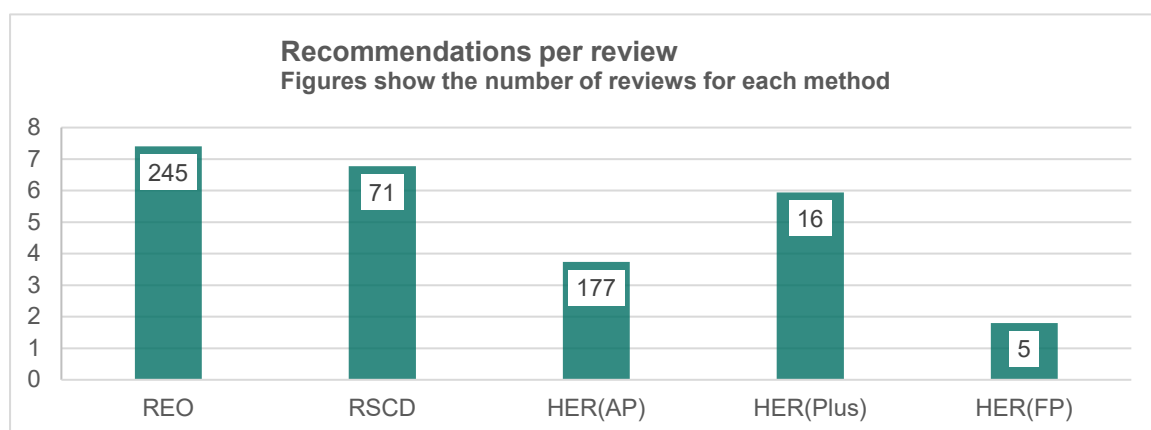


77 In HER(AP), there were noticeable increases over time in the frequency of occurrence of features of good practice in several areas, particularly about student development and achievement. In addition, greater numbers of features of good practice were found in themes which did not feature significantly in REO, specifically about programme approval, recruitment and admission of students, and the enhancement of the quality of learning opportunities.



Recommendations

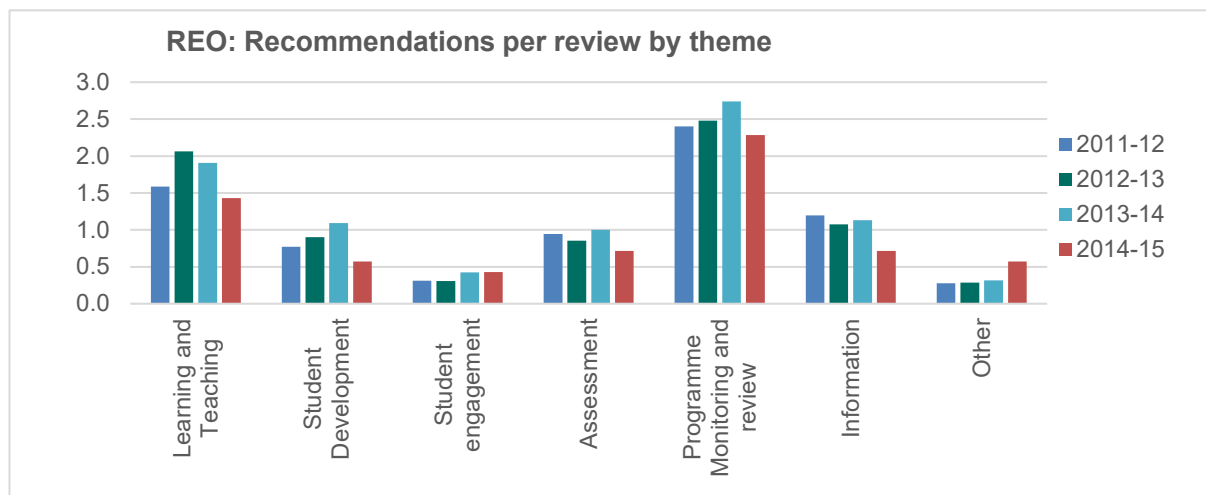
78 A total of 3060 recommendations were made to providers in the 514 reviews under consideration, distributed between the various methods as shown. Of these, 2505 (82%) related to the six aspects of provision specified above. Recommendations were notably common about programme monitoring and review, and to learning and teaching.



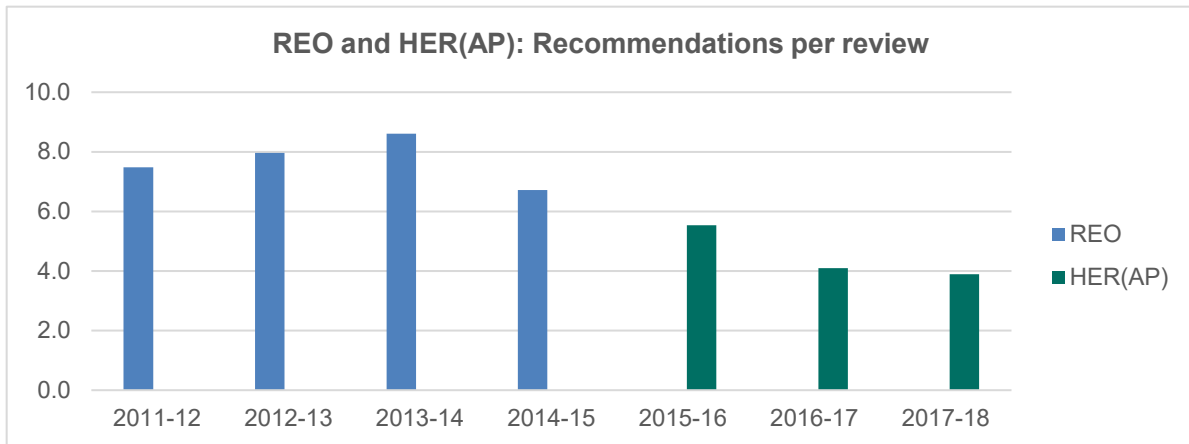
79 Recommendations about learning and teaching typically arose from the need to adopt a strategic approach to teaching and to monitoring its effectiveness, and to the need for continuing staff development and training in support of teaching activities. Recommendations about programme monitoring and review generally related to the need to ensure a systematic and strategic approach to regular monitoring of provision and of student outcomes.

80 For REO, RSCD and HER(Plus), the mean number of recommendations per review lay within the range 5.9 to 7.4. The lower figure of 1.8 for HER(FP) was based on only a small number (five) of reviews. The figure of 3.7 recommendations per review for HER(AP) is lower than for most other methods, but includes a greater number of recommendations classified here as 'Other' - 344 (52%) of a total of 662 recommendations for HER(AP) overall. These related to several aspects of provision, principally to the setting and maintenance of academic standards, arrangements for programme design and approval, the recruitment, selection and admission of students, arrangements for academic appeals and student complaints, and to the steps being taken by providers to enhance the quality of learning opportunities.

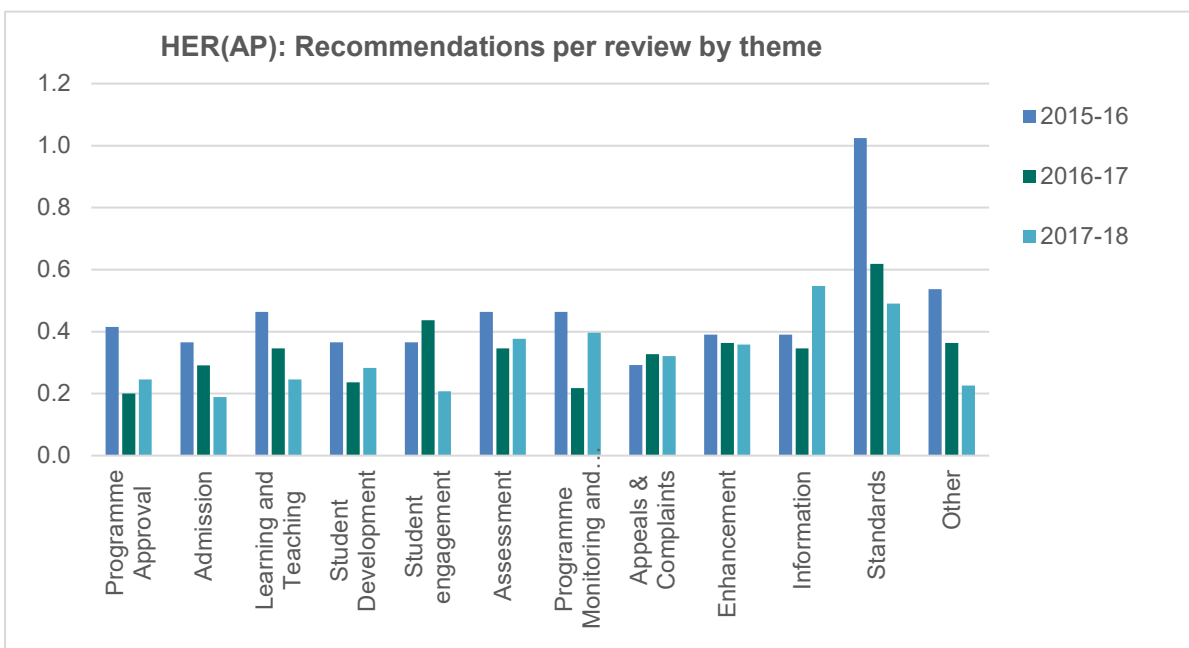
81 There was no clear trend over time in the frequency of occurrence of recommendations under REO. The areas of programme monitoring, and learning and teaching, continued to be the predominant bases for recommendations throughout the four-year duration of REO. However, for HER(AP), there were marked decreases over time in recommendations per review relative to REO. This may be due to the nature of providers presenting for review - by the time of the introduction of HER(AP) in 2015, as many as 26% of the providers subject to oversight by QAA in 2012 had dropped out of such oversight.



82 The findings of REO reviews and HER(AP) reviews taken together show a clear trend of reductions in the average numbers of recommendations per review, from a peak in excess of eight under REO in 2013-14 to no more than four under HER(AP) in 2017-18.

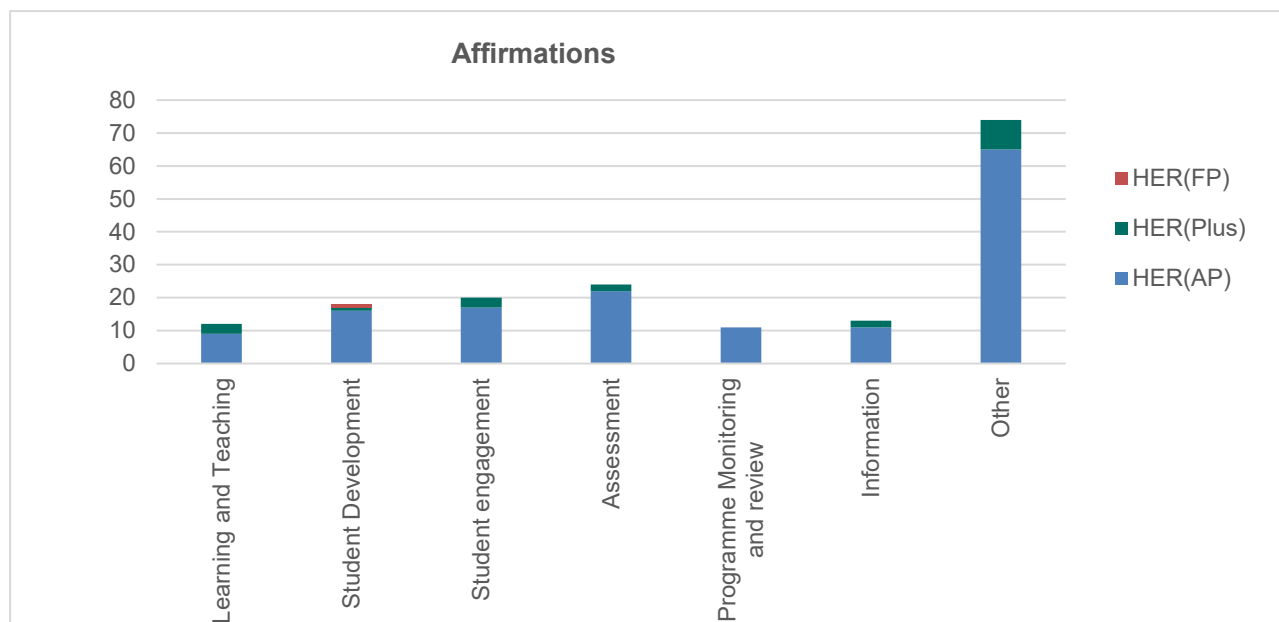


83 Reductions in recommendations during the period of HER(AP) relate to academic standards, and particularly to the theme of 'securing academic standards and an outcomes-based approach to academic awards', but also about programme approval, and to learning and teaching. However, some other areas showed no evidence of reductions in the frequency of recommendations including assessment, programme monitoring and review, information about higher education, and the enhancement of the quality of learning opportunities.

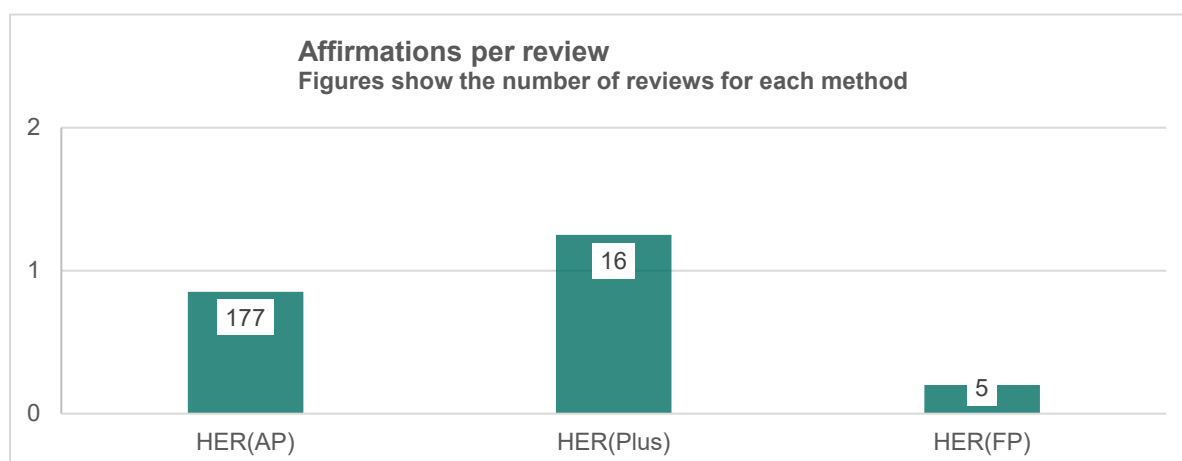


Affirmations

84 The HER methods included the facility for providers to affirm actions already being taken to address a concern identified by its own processes to secure academic standards or to improve the quality of educational provision. The identification of an affirmation thus provides evidence of the strength of the provider's internal quality assurance mechanisms and the ability to identify weaknesses and act upon them. A total of 172 affirmations were made in the 198 HER reviews carried out.



85 Relative to features of good practice and recommendations, affirmations were fewer in number but were more widely spread across the full range of aspects of provision identified in the Quality Code. Most commonly, affirmations related to the assessment of student work, to the engagement of students in the assurance and enhancement of their educational experience, and to the development of students' academic, personal and professional potential.



86 In addition, there is a larger proportion classified here as 'Other', numbering 74 in all. These comprise affirmations of actions being taken in providers at the time of the review relating, in particular, to the maintenance of academic standards, to the recruitment, selection and admission of students and to steps being taken by providers to enhance the quality of learning opportunities.

Summary

87 Review visits under REO, RSCD, HER(AP), HER(Plus) and HER(FP) typically identified features of good practice and recommendations and related them to an aspect of the provision concerned. Analysis of the frequency of occurrence of features of good practice and recommendations of the aspects to which they are related, allows trends in the findings of reviews to be identified.

88 The six aspects of provision most frequently cited in the identification of features of good practice and recommendations were learning and teaching, enabling student development and achievement, student engagement, assessment of students and the recognition of prior learning, programme monitoring and review, and information about higher education provision.

89 A total of 1084 features of good practice were identified in the 514 reviews under consideration. Of these, 955 (88%) related to the six aspects of provision specified above. Features of good practice were notably common in relation to learning and teaching, and student development, reflecting the strengths of many alternative providers in these areas. While there were no significant differences between review methods in the frequency of identification of features of good practice, reviews conducted under HER(AP) identified greater numbers of such features in aspects of provision other than the six identified above, particularly about the admission of students and to the enhancement of the quality of learning opportunities. There was a marked increase in the frequency of occurrence of features of good practice after the migration from REO to HER(AP) in 2015, although the reasons for this change are unclear.

90 A total of 3060 recommendations were made in the 514 reviews under consideration. Of these, 2505 (82%) related to the six aspects of provision specified above and were particularly common about programme monitoring and review, and to learning and teaching. The number of recommendations per review identified in HER(AP) reviews was markedly lower than in reviews conducted under REO and RSCD - part of a trend of declining numbers of recommendations per review in the period from 2013-14 to 2017-18. In particular, the frequency of recommendations relating to academic standards, to programme approval, and to learning and teaching fell noticeably under HER(AP) during this period.

91 The HER methods included the facility to affirm actions already being taken by the provider to address a concern identified by its own processes so as to secure academic standards or to improve the quality of educational provision; the identification of an affirmation thus provides evidence of the strength of the provider's internal quality assurance mechanisms. A total of 172 affirmations were made in the 198 HER reviews carried out. Most commonly, affirmations related to the assessment of student work, to the engagement of students in the assurance and enhancement of their educational experience, and to the development of students' academic, personal and professional potential.

Conclusion

92 This report has provided a comprehensive review of the work carried out by QAA between 2011-21, to develop and implement an external quality assurance regime for alternative providers. It has reflected on changes to the political and regulatory landscape and on QAA's role in responding to, shaping and regulating the work of alternative providers, to maintain academic standards and enhance the quality of the student experience across the breadth of the sector. It describes a relationship framed in a changing and complex environment where QAA, working with key stakeholders at the Home Office, the Department for Business, Innovation and Skills and then Department for Education, needed to respond swiftly and flexibly in developing effective approaches for the quality assurance and enhancement of alternative providers.

93 As the report has described, the pressure to extend QAA's expertise and experience across to the regulation of alternative providers came initially from external factors including the significant growth in the number of alternative providers and political concerns regarding misuse of immigration rules in some cases. At the Government's request, QAA was asked to ensure that its tried and tested review methodology could be extended to the growing sector of alternative providers.

94 As things progressed, QAA needed to develop a range of methodologies to reflect changing political and educational requirements as well as the complexity and diversity of alternative providers. While the review methods varied, they shared the core principles of QAA review processes which applied across the rest of the higher education sector. They judged academic standards and the quality of students' learning opportunities, they identified good practice and made recommendations for improving the provider's management of its higher education provision, and they were framed by the Expectations of the Quality Code. QAA focused on the core principles of its review processes which aimed to improve the quality of UK higher education.

95 The advent of rigorous oversight by QAA saw many weaker alternative providers withdraw from sector. For the many that were left, the outcomes of reviews revealed the extent to which remaining alternative providers met sector expectations regarding academic standards and quality. The reports pointed to sources of strength and good practice but also areas for improvement, for example, with respect to the quality of learning and teaching, assessment, and programme monitoring and review.

96 It is evident in the early days that the alternative provider sector did not necessarily welcome what was seen in some quarters as the imposition of external QAA review. It was a significant change and a challenge. Initially, the 'fit' between some alternative providers' ways of working and the frameworks imposed by QAA, seemed out of sync.

97 However, it is also apparent that many alternative providers seized the opportunity to further engage with the wider sector and embraced the challenge of meeting UK expectations for academic standards and quality. Many providers entered the relationship with an intention and willingness to provide the best education for their students, alongside judicious use of public funds. For them, the experience was eventually beneficial with positive outcomes. At the same time, a mutually supportive relationship developed with alternative providers and QAA working together in the changing regulatory and operating environment to share good practice and assure the quality of higher education. The streamlining of the Quality Code was seen as an important step as was the fact that the review process had the student experience at its heart.

98 First and foremost, bringing alternative providers into the quality assurance framework helped to ensure that UK higher education, wherever it was delivered, was subject to the same common framework for the quality assurance of academic quality and standards. Overall, this led to fewer, better quality providers and assurance of a good student experience and valued qualification. QAA review of alternative providers has improved those institutions but it has also significantly contributed to the enhancement of UK higher education and helped preserve the reputation of UK higher education worldwide.

Dedication to Aldwyn Cooper

During our time working in partnership with alternative providers, QAA have had the pleasure of working with a wide range of talented leaders. Among them, we wish to pay tribute to Professor Aldwyn Cooper, who passed away on 3 February 2021. Professor Cooper served on QAA's Advisory Committee on Degree Awarding Powers (ACDAP) from 2014 to 2019. He brought a wealth of knowledge and experience from across the higher education sector, but particularly from his significant role at Regent's University London. He began as Principal and CEO of Regent's College in 2007 and steered the college to successfully achieve taught degree awarding powers in 2012 and full university title in 2013. In addition to his expertise, he is remembered for his strength of personality - he was unfailingly gracious, charming and brought an amiable flair to his work.

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