

The Quality Assurance Agency for Higher Education, UK

Self-Assessment Report for Review by ENQA

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Foreword

This report has been prepared for our third review by ENQA (the European Association for Quality Assurance in Higher Education).

The process of developing this report has once again proved to be an invaluable developmental activity for QAA, and will provide a strong platform on which the Agency will continue to build and enhance its work in future years.

The UK higher education landscape continues to change, with recent major regulatory and policy developments across the UK including the passing of the Higher Education and Research Act 2017 in England, the conclusion of the Quality Enhancement Review in Scotland, and the development of the Quality Assessment Framework for Wales.

Outside the UK, QAA is firmly committed to its role in international quality assurance, policy development and collaborative projects. One of the three aims of QAA's strategy is to use the Agency's international reputation and partnerships to benefit UK higher education. In Europe, QAA is proud to be a member of ENQA, to be listed on the European Quality Assurance Register, and to continue to contribute to the Bologna Process and the development of key reference points such as the Standards and Guidelines for Quality Assurance in the European Higher Education Area.

External quality assurance must keep pace with a fast-changing higher education landscape, with increasing diversity of providers and delivery modes, and rising student expectations. This report details significant areas of development for QAA since our last ENQA review in 2013, including: new and revised review methods; extending the role of students in our work; greater use of data and analytics; expansion of international relationships; completion of an organisational transformation programme and governance review; and providing expert contributions to major policy and regulatory developments across all four UK nations.

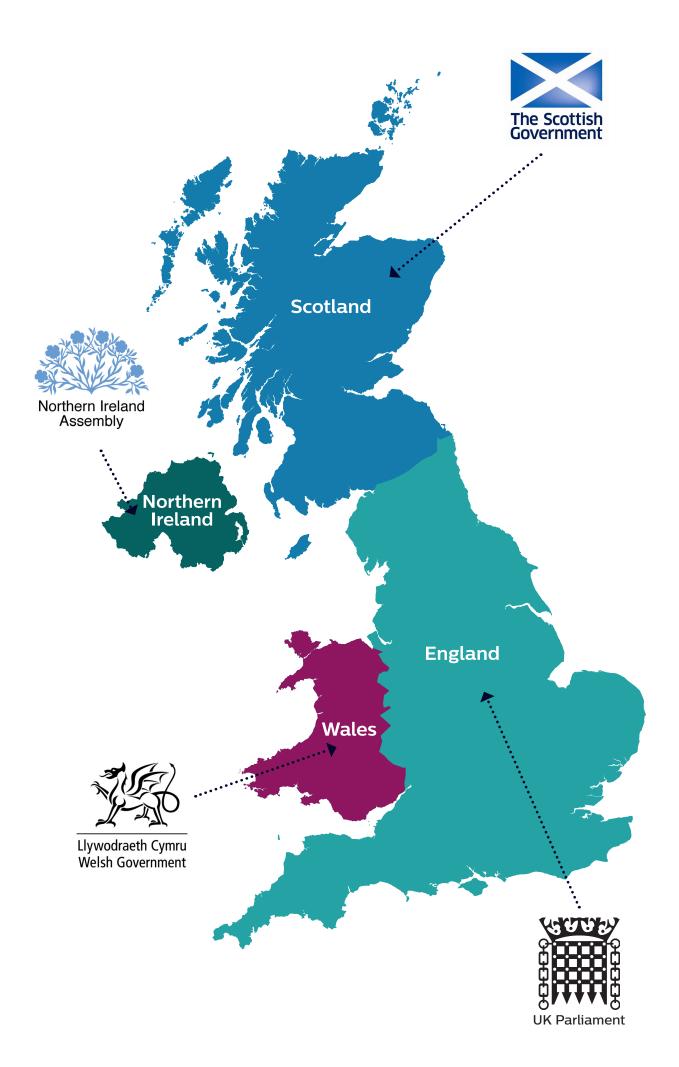
The new QAA strategy, *Building on World-Class Quality*, sets out how, as the UK's expert independent quality body, QAA will continue to deliver its vision of world-leading and independently assured UK higher education, ensuring the best possible academic experiences and outcomes for students.

We commend this report to the Board of ENQA and the review panel, and hope that it provides a full and clear picture of the work of QAA and its compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area.

Douglas Blackstock Chief Executive

Jugher Hubertul

Christopher Banks CBE Chair of the Board of Directors



1 Introduction

The Quality Assurance Agency for Higher Education (QAA) is an independent body that protects the quality and standards of UK higher education: to ensure the best possible student experience, and strengthen the global reputation for quality enjoyed by our universities and colleges.

QAA works as part of a system of co-regulation across the UK, in England, Northern Ireland, Scotland and Wales, within a higher education system where policy is devolved. This means that higher education policy is determined by each nation:

- in England, through the UK Government
- in Northern Ireland, usually through the Northern Ireland Executive (devolved power currently suspended)
- in Scotland, through the Scottish Government
- in Wales, through the Welsh Government.

QAA's mission:

To safeguard standards and improve the quality of UK higher education wherever it is delivered around the world.

OAA's vision:

Is for world leading and independently assured UK higher education.

The UK has one of Europe's largest and most diverse higher education sectors and, unlike many European countries, has in QAA an agency that operates as a single entity across the whole of the sector. It works with a diverse range of higher education providers including universities, specialist higher education institutions, alternative providers and further education colleges offering higher education programmes, and conducted 264 reviews in 2015–16.

The diversity of needs and interests manifest in different parts of the UK higher education system is reflected in the range of different external review methods operated by QAA. Given the complexity of the UK system, a single 'one size fits all' approach to external quality assessment is inappropriate.

Since QAA's last review by ENQA, the context within which it works has changed due to external factors that are discussed in more detail on pages 11–13. However, all of QAA's review methods share a common set of principles, which include:

- the UK Quality Code for Higher Education (Quality Code), incorporating The
 Frameworks for Higher Education Qualifications of UK Degree-Awarding Bodies
 (Qualifications Frameworks): the reference point that sets out the expectations for
 the setting and maintenance of academic standards and the assurance of the quality
 of the student experience
- adherence to the model of review that includes self-assessment, peer review, site visit and published report
- enhancement as an expected outcome of review methods and QAA's engagement with the higher education sector
- direct engagement of students in external quality assurance and support for student engagement in internal quality assurance.

These principles are discussed further in the self-assessment report (SAR), particularly in section 6.

Through this process of self-evaluation, QAA has recognised that two of its established ways of working represent good practice. These are:



Student engagement - the work of the Agency in supporting, selecting and recruiting students to work with QAA through its governance structure, as peer reviewers and as members of a student body in a provider undergoing review.



Working in partnership - the co-regulation approach taken by the Agency to working with the UK higher education sector and its work with other organisations, for example development of guidance with practitioner input, to the benefit of the sector.

Evidence to reinforce these features of good practice is to be found throughout the SAR and is indicated by a star symbol beside relevant paragraphs.

The process of self-evaluation, coming as it did during a period of significant change for QAA and for quality assurance in the UK higher education sector, has provided a valuable learning opportunity for the Agency. As a result, we recognised that we need to continue to develop external communications to ensure that changes are understood, both within the UK and internationally. Working with colleagues on an initial SWOT analysis in particular has highlighted the need for us to re-examine and update several of our key policies, including those for Agency performance management and how we embed the ENQA staff development framework across the Agency. QAA is grateful for the opportunity that the ENQA review has provided for self-reflection and analysis.

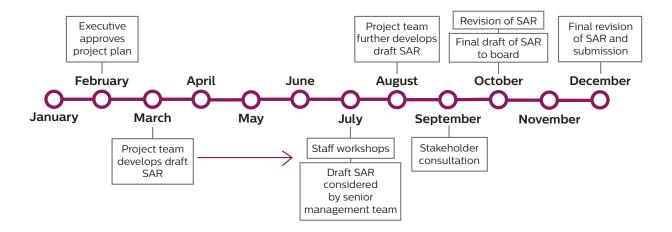
QAA has sought to clarify, through this SAR, those overarching and common principles that apply to all of its work, and the provenance and scope of each of its activities, and to state clearly any exceptions to general statements. QAA sees the ENQA review process as an opportunity to look across and evaluate the entirety of its remit and looks forward to meeting with the review panel to answer questions, and to further clarify and discuss aspects of its work with peers.

2 Development of the self-assessment report (SAR)

On the approval of the QAA Executive Team, a project team was established to develop¹ the self-assessment report (SAR). This team was made up of 11 people from across QAA, drawing on the expertise and knowledge of colleagues from all parts of the Agency.

At various stages of drafting the SAR, the project team drew on others within QAA to support the development of the document. This included other staff at the Agency through workshops that focused in particular on developing an initial SWOT analysis (section 13) and a meeting with the senior management team that focused on clarifying the key themes and principles outlined in the document.

The project team shared a well-developed draft of the SAR with QAA Board members and also drew on people outside of the Agency to provide advice and guidance on the content and presentation of the SAR. This was conducted through a consultation with key UK stakeholders; the SAR was also sent to two international readers to check its clarity for those reading it without a UK background. Following revisions, the SAR was considered as part of a Board away day and was finally signed off by QAA's Board and Chief Executive before being submitted to ENQA.



3 Higher education and QA of higher education in the context of the Agency

UK higher education providers

The term 'provider' is widely used in the UK to describe any institution or organisation that delivers or contributes to all or part of a higher education programme. Providers fall into four main groups, as follows. There is some overlap between the first and fourth groups.

- Universities: university title is a term protected by law and may only be used by those providers that have been granted the title by government. Some universities have held the title for centuries, but to gain UK university title today a provider must meet certain criteria, including having been granted powers to award taught degrees and meeting thresholds in relation to the number of higher education students. There are 168 universities in the UK; four of these are private and do not receive public grant funding (see alternative providers below). Those universities that receive grant funding may be known as 'publicly funded'.
- Publicly funded higher education providers: colleges, university colleges or smaller specialist institutions such as conservatoires. Not all of these providers have degree awarding powers (DAP); some have taught DAP but not research DAP.
- Further education colleges: there are more than 200 further education colleges that provide higher education programmes. Seven of these have the power to award their own degrees, but the majority provide programmes leading to an award from a separate degree-awarding body (normally a university). Most further education colleges that provide higher education receive grant funding from the relevant UK higher education funding body, hence they are also known as 'publicly funded.'
- Alternative providers: these are providers that do not receive grant funding from one of the UK higher education funding bodies. Some universities are alternative providers and hold their own DAP, but, like further education colleges, the majority provide programmes leading to an award from a separate degree-awarding body. Since they do not receive public grant funding, alternative providers are sometimes known as 'private' providers.

Requirements to undergo external quality assurance

Different providers are obliged to undergo external quality assurance for different reasons:

• Publicly funded providers are obliged to undergo external quality assurance or assessment because the bodies that allocate public funding are required by law to ensure that provision is made for the assessment of the quality of the education at providers they fund. The bodies that provide public funding are the Higher Education Funding Council for England (HEFCE),² the Scottish Funding Council (SFC),³ the Higher Education Funding Council for Wales (HEFCW)⁴ and the Department for the Economy in Northern Ireland (DfE(NI)).⁵ Each funding body has different requirements for quality assessment.

^{2 &}lt;u>www.hefce.ac.uk</u>

^{3 &}lt;u>www.sfc.ac.uk</u>

^{4 &}lt;u>www.hefcw.ac.uk</u>

^{5 &}lt;u>www.economy-ni.gov.uk</u>

- Alternative providers of higher education are obliged to take part in external quality assurance if:
 - they want 'educational oversight' from QAA, which they need in order to be licensed by the UK Government to recruit students who are not European Economic Area nationals
 - they want 'specific course designation', which allows eligible students access to student support loans from the Student Loans Company (SLC)
 - they hold DAP, which, for alternative providers, must be renewed every six years.

UK degrees and degree awarding powers

Decisions to grant degree awarding powers in the UK are made by the Privy Council, based on assessment and scrutiny of applicant providers by QAA and its advice to the respective UK Government. Precise arrangements depend on where in the UK the applicant is based.⁶

There are three main types of degree awarding powers:

- foundation degree awarding powers (FDAP) give further education colleges in England and Wales the right to award foundation degrees
- taught degree awarding powers (TDAP) give UK higher education providers the right to award bachelor's degrees with honours, taught master's degrees and other taught higher education qualifications, but not postgraduate research degrees as set out below under RDAP
- research degree awarding powers (RDAP) give UK higher education providers with TDAP the right to award doctoral degrees and master's degrees, where the research component (including a requirement to produce original work) is larger than the taught component when measured by student effort.

Currently, publicly funded providers are entitled to DAP in perpetuity, whereas alternative providers with such powers have to renew those powers every six years. (For further information on QAA's role in the process for DAP, see section 6).

The Higher Education and Research Act 2017 (HERA) has brought significant reform to the processes for achieving DAP in England, including the option of a new system of probationary DAP (now referred to as new DAP or NDAP). QAA is advising government on the development of both criteria and process to be introduced in 2018–19. The impact of these changes is also being considered by the other countries of the UK.

Students and staff

According to the Higher Education Statistics Agency (HESA), UK student and staff numbers for the 2015-16 academic year⁷ were as follows:

	England	Northern Ireland	Scotland	Wales	UK (total)
Students*	1,861,345	55,245	235,565	128,675	2,280,830
Staff (academic)	168,705	3,115	19,890	9,670	201,380
Staff (non- academic)	170,400	3,530	23,815	11,005	208,750

^{*}Postgraduate and undergraduate

Of the student numbers provided above, a notable percentage were international students studying in the UK:

- 127,440 from other European Union member countries
- 311,075 from non-European Union countries.

Students studying wholly outside the UK with a UK provider in 2015-16 (transnational education) were:

- 74,965 within the European Union
- 626,045 outside the European Union.

The countries with the highest number of UK transnational education students including distance learning in 2015-16 were Malaysia, China, Singapore, Pakistan and Nigeria.⁸

Qualifications frameworks

QAA maintains and publishes the Qualifications Frameworks for UK higher education, on behalf of the HE sector.

The Frameworks for Higher Education Qualifications of UK Degree-Awarding Bodies (Qualifications Frameworks) are part of the Quality Code⁹ (specifically, Part A: Setting and Maintaining Academic Standards), which sets out the expectations that all providers of UK higher education are required to meet.¹⁰

The Qualifications Frameworks describe the achievement represented by higher education qualifications. They apply to degrees, diplomas, certificates and other academic awards granted by a higher education provider with degree awarding powers.

There is one qualification framework for higher education in England, Wales and Northern Ireland (*The Framework for Higher Education Qualifications in England, Wales and Northern Ireland* – FHEQ), and a separate one for Scotland (*The Framework for Qualifications of Higher Education Institutions in Scotland* – FQHEIS). Since 2014, both are combined in the single Qualifications Frameworks publication.¹¹ Both Scotland and Wales have developed credit and qualifications frameworks and, functionally, the FQHEIS effectively forms part of the Scottish Credit and Qualifications Framework (SCQF),¹² which covers pre-HE levels of learning, as well as the three cycles at HE. Similarly, the FHEQ is a constituent part of the Credit and Qualifications Framework for Wales (CQFW).¹³ The SCQF is not maintained by QAA but the Agency is a member

^{7 &}lt;u>www.hesa.ac.uk/data-and-analysis/publications/higher-education-2015-16</u>

^{8 &}lt;u>www.hesa.ac.uk/data-and-analysis/students/international-study</u>

⁹ UK Quality Code for Higher Education: www.qaa.ac.uk/quality-code

The Frameworks for Higher Education Qualifications of UK Degree-Awarding Bodies: www.qaa.ac.uk/publications/information-and-guidance/publication?PublD=2843

¹¹ The Frameworks for Higher Education Qualifications of UK Degree-Awarding Bodies (as above)

^{12 &}lt;a href="http://scqf.org.uk">http://scqf.org.uk

https://businesswales.gov.wales/skillsgateway/sites/dfes/files/cqfw-brochure-en.pdf

organisation of the SCQF Partnership. The CQFW is also not maintained by QAA, but takes account of the Agency's advice in its work.

QAA has verified that UK qualifications frameworks are compatible with the Bologna framework for qualifications in the EHEA (FQ-EHEA) in November 2008.¹⁴

The following table gives examples of the typical higher education qualifications at each level of the UK qualifications frameworks and the corresponding cycle of the FQ-EHEA. Within each level, the various qualifications involve different volumes of learning and hence differences in the range of intended learning outcomes.

In addition, to enable student mobility and to provide information for employers, QAA has worked with a number of partner organisations to publish *Qualifications Can Cross Boundaries: A guide to comparing qualifications in the UK and Ireland.*¹⁵

Verification of the Compatibility of the FHEQ with the FQ-EHEA: www.qaa.ac.uk/en/Publications/Documents/Verification-of-the-compatibility-of-The-framework-for-higher-education-qualifications-in-England--Wales-and-Northern-Irel.pdf;

Verification of the FQHEIS as part of FQ-EHEA:

www.qaa.ac.uk/en/Publications/Documents/Verification-of-compatibility-Scottish-FQHE.pdf www.qaa.ac.uk/en/Publications/Documents/qualifications-can-cross-boundaries.pdf

Examples of the typical higher education qualifications at levels of *The Frameworks for Higher Education Qualifications of UK Degree-Awarding Bodies* and their corresponding cycle in the FQ-EHEA

Typical higher education qualifications awarded by degree-awarding bodies with each level	FHEQ level	FQHEIS/ SCQF level	Corresponding QF-EHEA cycle
Doctoral degrees (e.g. Phd/DPhil, EdD, DBA, DClinPsy)	8	12	Third cycle (end of cycle) qualifications
Master's degrees (e.g. MPhil, MLitt, MRes, MA, MSc)			Second cycle (end of cycle)
Integrated master's degrees (e.g. MEng, MChem, MPhys, MPharm) Primary qualifications (or first			qualifications
degrees) in medicine, dentistry and veterinary science (e.g. MB ChB, MB BS, BM BSe; BDS; BVSc, BVMS)	7	11	
Postgraduate diplomas			
Postgraduate Certificate in Education (PGCE)/Postgraduate Diploma in Education (PGDE)			
Postgraduate certificates			
Bachelor's degrees with honours (e.g. BA/BSc Hons)	6	10	First cycle (end of cycle)
Bachelor's degrees		9	qualifications
Professional Graduate Certificate in Education (PGCE) in England, Wales and Northern Ireland			
Graduate diplomas			
Graduate certificates			
Foundation degrees (e.g. FdA, FdSc)		n/a	Short cycle
Diplomas of Higher Education (DipHE)		8	(within or linked to the first cycle) qualifications
Higher National Diplomas (HND) awarded by degree-awarding bodies in England, Wales and Northern Ireland under licence from Pearson	5	n/a	

Recent UK higher education policy developments

Note: see pages 6-7 for information on alternative providers.

UK

The UK Standing Committee for Quality Assessment was established in November 2016. The Committee provides sector-led oversight of higher education quality assessment arrangements that continue to be shared across the UK. The Committee is chaired by Professor Andrew Wathey, Vice-Chancellor of Northumbria University and also a member of the QAA Board. QAA's role is to support the assurance of quality and standards across the UK and its Chief Executive Officer is a member of this committee. Its remit is to:

- ensure the reliability of degree standards (including projects on developing training for external examiners, approaches to the calibration of standards, and a review of degree classification algorithms)
- explore the support required by governing bodies as they exercise effective oversight of academic governance
- develop a strategic understanding of transnational education (TNE), including through review of TNE activities to ensure that students studying for a UK higher education qualification overseas receive a high quality academic experience, and that the reputation of the UK higher education system as a whole is protected.

England

In 2016, HEFCE launched a new model for quality assessment of the providers it funds.¹⁷ The new model aims to be proportionate, risk-based and grounded in the mission and context of an individual provider and the composition of its student body. The new model consists of three core elements:

- a single gateway for entry to the publicly funded part of the higher education sector and a period of close engagement and monitoring for recent entrants
- risk-based review arrangements for established providers, with rapid, tailored intervention when things go wrong
- protection of the international reputation of UK higher education, including the quality assurance of TNE.

QAA is delivering significant elements of the new model, 18 as follows:

- Quality Review Visits, which are part of the single gateway to the publicly funded sector and the engagement with recent entrants
- investigating concerns about unsatisfactory quality the rapid, tailored intervention when things go wrong
- a UK-wide contract for TNE reviews and international strategic engagement.

Further details of this work are provided in section 6.

The new Higher Education and Research Act 2017 (HERA) received Royal Assent in April 2017.¹⁹ It introduces a new regulatory body, the Office for Students (OfS), which comes into existence in January 2018, with HEFCE ceasing to exist on 1 April 2018. The remit of the OfS's is restricted to England.

The central role of the OfS will be to establish and maintain a register of English higher education providers. Key to the new system is that there will be no division between newer privately owned institutions, further education colleges and traditional universities.

^{16 &}lt;u>https://ukscqa.org.uk</u>

^{17 &}lt;u>www.hefce.ac.uk/reg/QualityAssessment</u>

¹⁸ HEFCE contract quality review visit; HEFCE contract unsatisfactory quality; HEFCE contract transnational education

¹⁹ www.legislation.gov.uk/ukpga/2017/29/pdfs/ukpga 20170029 en.pdf

Any institutions not registered will not be considered higher education providers and will not be able to access student support funding, for example. HERA also allows for the designation of an independent quality body with a duty to assess the quality of, and the standards applied to, higher education in England on behalf of the OfS. The intention is that these duties would include, for example, the design and operation of the quality assessment system and the assessment of standards.²⁰

QAA has publicly stated in its strategy to 2020²¹ that it is best positioned to be the designated quality body and will put forward the strongest case to support that, in the interests of UK higher education. The English Government issued a call for Expressions of Interest to be the designated quality body in August 2017. QAA was the only body to apply and the Government is currently consulting on our suitability for this role. The outcome will be made public in spring 2018. During debate on HERA in Parliament, QAA received 80 positive mentions from Parliamentarians of all political parties, while stakeholders across the sector have expressed support for QAA to become the designated quality body.

HERA provides that the OfS will operate the recently introduced Teaching Excellence Framework (TEF).²² QAA advised government in England during the design of the TEF and worked closely with HEFCE in delivering the assessment process for Year 2 of the TEF (2016–17). QAA is also contributing to its future development at subject level. The DfE published the draft regulatory framework of the Office for Students on 19 October 2017.

It is worth noting that the above changes are set in the context of a shift in the funding of higher education since 2012, with tuition fees rather than teaching grants now providing the main source of funding to providers in England.

Northern Ireland

DfE(NI) has adopted the same approach to quality assessment as HEFCE. HEFCE delivers some operational aspects of the model on behalf of DfE(NI), while QAA also delivers significant elements as outlined above (in the section relating to England).

Scotland

The University Quality Working Group undertook a review of the Quality Enhancement Framework (QEF) in Scotland in 2015–17.²³ The Group represents all the partners from the Quality Enhancement Framework (SFC as the funding body, QAA as the quality agency, Universities Scotland as the representative body of the HE sector and NUS Scotland as the students' representative body, together with sparqs). See page 24 for more detail on sparqs. The Framework balances quality assurance and enhancement and emphasises the student learning experience and partnership between sector bodies. The review considered each element of the QEF and QAA led on facilitated work on student engagement, Enhancement–Led Institutional Review (ELIR) and the Enhancement Themes.



Scotland's Enhancement Themes are a national programme of planned, strategic activity designed to enhance our students' learning experience and are managed by QAA Scotland. The programme encourages academic staff, support staff and students to share current good practice and collectively generate ideas and models for innovation in learning and teaching. The Themes are part of Scotland's commitment to excellence in higher education and to providing an outstanding student learning experience.

- 20 <u>www.gov.uk/government/uploads/system/uploads/attachment_data/file/637055/Expression_of_interest_for_designated_quality_body.pdf</u>
- 21 QAA Strategy 2017-20:
 - www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=3158
- 22 <u>www.hefce.ac.uk/lt/tef</u>
- 23 Quality Enhancement Framework: www.qaa.ac.uk/en/AboutUs/Pages/Development-and-enhancement.aspx

The review of ELIR was supported by an External Institutional Review Advisory Group, comprising members from the sector with experience of being reviewed and being reviewers, including student reviewers. The review has seen the ELIR method continue to evolve and, in April 2017, QAA published the new handbook for ELIR.²⁴ It introduces a number of changes in the process, many of which relate to contextualisation:

- more detailed discussions about the scope and focus of the review at an early stage
- feedback from the ELIR team on the contextualisation decisions in advance of the Planning Visit
- a one-day Planning Visit rather than a two-day Part 1 Visit
- adjustments to the technical report structure and style, including much greater emphasis on the institution's approach to using data to inform its decision making and the analysis of its strengths, challenges and priorities.

SFC's statutory duty in Scotland continues to cover both quality assurance and quality enhancement; thus, enhancement continues to be a particularly strong feature of QAA's work in Scotland.

Wales

Following the introduction of the Higher Education (Wales) Act 2015, publicly funded providers in Wales (known as 'regulated providers') operate within the Quality Assessment Framework, developed by HEFCW during 2015–17.²⁵ A condition of the Framework, specified in its April 2017 publication, External Quality Assurance Review,²⁶ is that from 2017 regulated providers must undergo a review from a body on the European Quality Assurance Register at least every six years. In May 2017, Universities Wales announced that it had commissioned QAA to be the independent external quality agency on behalf of all universities in Wales, an agreement that may be extended to include a small number of relevant further education institutions.²⁷

QAA has consulted with providers and other stakeholders on the design of a method in Wales, and published the handbook in October 2017. QAA designed the method to provide the assurance required by HEFCW as set out in External Quality Assurance Review, April 2017. It is designed to enable HEFCW to approve Fee and Access Plans from institutions each year, and therefore for regulated institutions to access student funding. The review complies with the European Standards and Guidelines, and covers the specific requirements related to the Welsh language and the Credit and Qualifications Framework for Wales. QAA will pilot the method in the 2017-18 academic year.

At the end of January 2017, the Welsh Government announced that it had accepted the recommendations of a review of 'post-compulsory education in Wales with specific reference to the future role and function of the Higher Education Funding Council for Wales' (the 'Hazelkorn review').²⁹ In autumn 2017 the Welsh Government consulted on proposals to take forward its recommendations.³⁰ The consultation proposed the formation of a single body to oversee the post-compulsory education sector in Wales, including higher education, further education, work-based learning and 'sixth form' provision in schools. The Welsh Government's proposed reforms will have implications for the scale and scope of QAA's work in Wales from around 2021.

At time of writing, QAA anticipates engaging with a subsequent technical consultation in spring 2018.

- 24 ELIR handbook: www.qaa.ac.uk/publications/information-and-guidance/publication?PublD=3157
- 25 <u>www.hefcw.ac.uk/policy_areas/learning_and_teaching/qa_fa_wa.aspx</u>
- 26 <u>www.hefcw.ac.uk/documents/policy_areas/learning_and_teaching/External%20quality%20assur-ance%20review.pdf</u>
- 27 <u>www.uniswales.ac.uk/universities-wales-weekly-wrap-up-12-may-2017-2</u>
- 28 Quality Enhancement Review handbook:
 - www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=3199
- 29 http://gov.wales/docs/dcells/publications/160310-hazelkorn-report-en.pdf
- 30 <u>https://consultations.gov.wales/consultations/reformed-post-compulsory-education-and-training-system</u>

4 History, profile and activities of the agency

Origins

In 1997, QAA was established as a single quality assurance service for providers of higher education in the UK.³¹ QAA brought together the Higher Education Quality Council (HEQC) and the quality assessment divisions of HEFCE (which had previously also had responsibility for external quality assurance in Northern Ireland), and HEFCW. The Scottish Higher Education Funding Council agreed to contract its quality assurance activities to QAA soon afterwards.

As QAA celebrated its 20th birthday in 2017, it looked back over its evolution during the last 20 years, including changes to the national context, changes in the higher education sector and resulting changes in review methods. During that period, QAA benefited from two external reviews by ENQA, the outcomes of which have assisted the Agency in meeting challenges and considering how it might improve its operation and processes.³²

Strategy

In May 2017, QAA launched its new strategy, *Building on World-Class Quality*, with a vision for world-leading and independently assured UK higher education.³³

The strategy has three main objectives: that by 2020, QAA will be recognised and valued by student bodies, providers and governments as:

- the expert independent quality body supporting a diverse system of co-regulation of UK higher education
- delivering valued services that provide assurance and drive quality enhancement
- using QAA's international reputation and partnerships to benefit UK higher education.

Organisation

In response to changing expectations of QAA, a new organisational structure was adopted in the summer of 2016. This structure changed QAA from a system of organisation around the processes we operated, to one focused on the providers in the diverse sector in which we work. An organigram setting out the main structure of the Agency is provided below:



- 31 Letter regarding quality assurance in higher education, 13 March 1997
- 32 QAA review report by ENQA 2013
- 33 QAA Strategy 2017-20

Corporate legal status

QAA is an independent body, a registered charity and a company limited by guarantee. Its Articles of Association, dated 10 April 2017, are published on its public website.³⁴ Additionally, the Agency has a Companies House Certificate of Incorporation.³⁵

Governance

QAA Board

QAA is governed by its Board, chaired by Christopher Banks CBE. The QAA Board is responsible for QAA's mission, strategy and policy development at strategic level, for the Agency's finances and for monitoring its performance against agreed targets at a corporate level.³⁶ It oversees all annual reporting, with overall responsibility for the company's assets.

There are 18 QAA Board members who are trustees of the charity, with experience both from within higher education across the UK, and in other areas.³⁷ The six independent members of the QAA Board (which includes the Chair) have been appointed on the basis of their experience of industry, commerce, finance or the practice of a profession. In the case of these six members, QAA issues a call for members. This is an open competition and prospective candidates apply and are selected on the basis of an interview. There are also two student Board members, one independent and one nominated by the National Union of Students (NUS).



In addition, the Board includes members drawn from the diverse range of UK providers and higher education funding bodies. These Board members are nominated by their respective bodies and are recommended to the Board by its Nomination and Remuneration Committee. They are formally appointed by the Board. QAA has recently adapted its governance to reflect changes in the HE sector by appointing a representative from an alternative provider to its Board.

The QAA Board has a number of committees, each of which is chaired by a Board member or independent person approved by the Board:³⁸

- Access Recognition and Licensing Committee
- Advisory Committee on Degree Awarding Powers
- Student Strategic Advisory Committee (SAC)
- Audit Committee
- Nominations and Remuneration Committee
- QAA Wales Strategic Advisory Committee
- QAA Scotland Strategic Advisory Committee
- QAA Enterprises.

Chief Executive

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

- 34 Articles of Association: www.gaa.ac.uk/en/AboutUs/Documents/Articles-of-Association.PDF
- 35 QAA certificate of incorporation
- 36 Code of best practice:
 - www.qaa.ac.uk/en/Publications/Documents/Code-best-practice-QAA-Board.pdf
- 37 QAA board members: <u>www.qaa.ac.uk/about-us/corporate-governance/our-board</u>
- 38 QAA board committees:
 - www.qaa.ac.uk/about-us/corporate-governance/our-board/committee-membership

The Chief Executive is responsible for:

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

In addition, QAA has four directors,³⁹ each responsible for one of the main organisational areas as follows:

Ian Kimber, Universities, Quality Enhancement and Standards, is responsible for QAA's engagement with universities and its services for subscribers, including enhancement. He oversees QAA's stewardship of the Quality Code and associated external quality reference points. He also leads on QAA's innovation and enterprise activity.

Will Naylor, Colleges and Alternative Providers, is responsible for QAA's relationships with further education colleges and alternative providers, and their representative bodies. He is also responsible for degree awarding powers scrutiny, the regulation of Access to HE diplomas, reviews for specific course designation and educational oversight, and the delivery of some of the contracts that QAA has been awarded by HEFCE.

Rowena Pelik, Nations and International, is responsible for QAA's work in Scotland, Wales, Northern Ireland and internationally. Within the UK, her role is to promote the interests and meet the particular needs of each of the UK's four nations. Internationally, her role is to provide strategic oversight of the engagement of QAA, on behalf of UK higher education, to support the interests of the UK sector globally. She also oversees QAA's assurance of transnational education.

Liz Rosser, Resources, is responsible for the strategic management of QAA's resources, a wide remit that includes IT, financial management, planning and performance management, funding negotiations, and people and organisational development.

Financial arrangements

QAA is funded through a number of channels:40

- subscriptions from higher education providers (all publicly funded higher education providers in the UK subscribe to QAA and pay an annual fee, as do some that are not publicly funded). It is mandatory for the vast majority of subscribers to pay the subscription fee; this is a requirement of their funding body. Subscription services include enhancement events and workshops, webinars and publications such as Insight pieces on various topics.
- contracts with the Higher Education Funding Council for England and Department for the Economy in Northern Ireland for quality assessment services
- commissions from providers in Wales for review services
- a contract with the four UK funding bodies (England, Wales, Scotland and Northern Ireland) for international activities
- an outcome agreement with the Scottish Funding Council and Universities Scotland
- a fee and an annual maintenance charge paid by providers of higher education seeking educational oversight from QAA
- a fee and an annual maintenance charge paid by providers of higher education seeking specific course designation from QAA
- a fee paid by providers of higher education seeking degree awarding powers for the scrutiny process that supports their application

³⁹ QAA leadership team: www.qaa.ac.uk/about-us/corporate-governance/leadership-team

⁴⁰ QAA Annual Report 2016: www.qaa.ac.uk/en/AboutUs/Documents/Annual-Report-2016.pdf

- contracts with the General Osteopathic Council (GOsC)
- other private contracts, consultancy and business development work in the UK and overseas.

The graph below shows the projected funding from each channel in 2017-18:

Projected Income 17-18 £'000's



Activities of the agency

QAA's main areas of work within the scope of the ESG are outlined below and are set out in more detail in section 6.

- Reviews of alternative providers.
- Enhancement-led reviews in Scotland.
- Reviews for regulated providers in Wales.
- Advising UK Governments on applications for degree awarding powers and university title.
- Delivering key elements of the revised operating model for quality assessment in England and Northern Ireland (Quality Review Visit; investigation of unsatisfactory quality).
- Transnational education reviews.
- Stewardship of the Quality Code on behalf of the sector.
- International strategic activities to support the world-class reputation and influence of the UK higher education sector.
- Working with UK Governments and other sector bodies to provide expert advice and support policy development (for example, guidance on plagiarism and essay mills).
- Delivering training, guidance and events to help UK higher education providers to develop and improve their own quality assurance processes.
- A programme of engagement with providers, students, and professional, statutory and regulatory bodies (PSRBs) to support UK higher education.
- Producing publications to support continuous improvement in the sector, including research, analysis, case studies and thematic reports.

Those activities that sit outside the scope of the ESG for the purposes of this review include:

- national capacity building and enhancement of quality assurance overseas
- institutional capacity building and enhancement of quality assurance overseas
- training for external quality review overseas
- International Quality Assurance Programme
- Teaching Excellence Framework
- Access to Higher Education.

Other recent changes

In its quest to maximise value and impact in terms of how it achieves its vision, in the last year QAA has entered a formal collaboration known as the M5 Group with the Higher Education Statistics Agency (HESA) and Jisc.⁴¹ The three agencies have a long history of collaborating on projects, in particular with HESA and Jisc delivering a national business intelligence service. The agencies intend to work even more closely together to develop better solutions to some of the long-term issues (see page 40 for further information) that are being faced by the UK higher education sector.

5 Higher education quality assurance activities of the agency

See page 17 for a list of those activities in scope of the ESG.

The table in Annex 2 also lists the activities of the Agency within the scope of the ESG. It indicates their alignment with the key principles set out in the ESG, with an explanation where there is some variance. The table should be read in conjunction with the map in Annex 1.

6 Processes and their methodologies

Summary

This is, necessarily, the longest section of QAA's SAR. It is structured as follows.

- A summary overview of the diversity of QAA's processes and methodologies.
- The framework of common principles under which all processes sit.
- The review methods and processes (see Annex 1 for map showing which methods are relevant to which parts of the UK).

QAA employs a range of different methods to conduct reviews of higher education providers; the method used will depend on a number of factors, including where the provider is located and what kind of provider it is. However, all review methodologies, with some exceptions (see Annex 2), share a set of core principles. These include the following.

- All review processes use the expectations for UK higher education enshrined in the Quality Code and other reference points.
- Evidence-based reviews are carried out by peers and students, based on a self-evaluation process and resulting in published reports detailing the findings, to provide public assurance on academic standards, quality and the provision of public information.
- All review processes have a focus on enhancement.
- All QAA review methods for publicly funded higher education have review teams that include a student member.

These four points are expanded on below.

Common principles

Nationally agreed reference points

QAA publishes a range of definitive reference points and guidance to support higher education providers in setting and maintaining academic standards, assuring quality and promoting quality enhancement. These publications are used by UK academic and professional staff responsible for qualifications and student learning opportunities.

The central reference point is the UK Quality Code for Higher Education, which QAA introduced from the 2011-12 academic year.⁴² The Quality Code is the revised iteration of the Academic Infrastructure, which was introduced in 1999 and which was considered in the two previous reviews by ENQA.

The Quality Code sets out the expectations that all UK higher education providers are required to meet, regardless of type or location. QAA works closely with the UK higher education sector to develop, maintain and update the Quality Code. The Quality Code has three Parts:

- Part A: Setting and Maintaining Academic Standards
- Part B: Assuring and Enhancing Academic Quality
- Part C: Information about Higher Education Provision.

Higher education providers use the Quality Code to help them set and maintain the academic standards of their programmes and awards, assure and enhance the quality of the learning opportunities they make available, and provide information about higher

education. It also recognises the value of enhancement and is designed to align with the ESG (see Annex 3). Student representatives and students' unions can use the Quality Code in their discussions with their higher education provider.

Reviewers carrying out QAA reviews use the Quality Code as a benchmark for judging whether a higher education provider meets national expectations for academic standards and the quality of learning opportunities.

There have been a number of developments in the Quality Code since QAA's previous review in 2013. In 2014, the two parallel frameworks for higher education qualifications of the UK, the FHEQ and the FQHEIS, were brought together in one framework document.⁴³

QAA undertakes regular reviews and consultations to ensure that all elements of the Quality Code remain relevant and up to date. For instance, between 2013 and 2016, QAA reviewed and revised over 60 Subject Benchmark Statements, which are components of Part A: Setting and Maintaining Academic Standards, to ensure the continuing currency of content.⁴⁴ In 2015, QAA responded to providers' requests for further guidance by working with the sector to publish further details on the nature of qualifications involving more than one degree-awarding body (including joint, double and dual degrees).⁴⁵

The UK Standing Committee for Quality Assessment (UKSCQA) has recently consulted on a new approach to the expectations of the Quality Code. The consultation sought to ensure that the Quality Code remains the cornerstone for quality in UK higher education, that it protects the public and student interest, and that it maintains the UK's world-leading reputation for quality in higher education.

The consultation proposed reform from the highest level, starting with new, streamlined sector expectations. It was designed to involve the sector at every stage, initially in the development of these expectations then in the longer-term development of the Quality Code.

QAA hosted the consultation, and the document was available in English and Welsh.

Enhancement

QAA's mission is 'to safeguard standards and improve the quality of UK higher education wherever it is delivered around the world'. One of the three aims of our Strategy 2017-20 is to deliver valued services that drive quality enhancement. QAA has had a responsibility for enhancement since its foundation, with one of the Company Objectives being 'the enhancement of teaching and learning, and the identification and promotion of innovation and good practice in teaching and learning'.

QAA supports higher education providers to improve the quality of the education they provide through the sharing of good practice and ideas. QAA publishes good practice identified in reviews and facilitates the sharing of good practice between providers and other stakeholders more widely through networks and events.

QAA review reports identify features of good practice, and a judgement on the enhancement of quality of students' learning opportunities from 2011–12 for reviews of degree-awarding bodies in England, Wales and Northern Ireland, and college-based higher education, was introduced from 2013–14. The enhancement judgement was then extended to the review of alternative providers from 2015–16. QAA publishes features of good practice, along with recommendations and affirmations (or equivalent), from all review methods through a searchable database on its website.⁴⁶

- The Frameworks for Higher Education Qualifications of UK Degree-Awarding Bodies (as above)
- 44 Subject Benchmark Statement review 2013-16: www.qaa.ac.uk/assuring-standards-and-quality/the-quality-code/subject-benchmark-statements/subject-benchmark-review-2013-15
- 45 Characteristics Statement on qualifications involving more than one degree-awarding body: <u>www.qaa.ac.uk/en/Publications/Documents/Joint-Degree-Characteristics-15.pdf</u>
- 46 QAA Knowledgebase: www.qaa.ac.uk/research/knowledgebase-search

Where providers receive commended judgements, QAA invites them to contribute good practice case studies to share their practice. These are published on QAA's website.

QAA also invites other providers to submit case studies if their practice has been of particular note. QAA incorporates these within published key findings reports. These provide a useful set of resources for quality managers and those who design and manage academic programmes of study.⁴⁷ QAA is building on these through a number of subscriber services, including a good practice case study programme (where subscribers have been invited to submit case studies for peer review and publication), online communities of practice, and a programme of Enhancement Themes.⁴⁸



QAA has begun to work with the other members of the M5 group, Jisc and HESA, on the use and application of data and analytics in quality assurance (see page 40 for further details).

QAA also cultivates debate and collaboration that contributes to improvements in the student learning experience. It facilitates the Quality Enhancement Network (QEN), which brings together quality assurance professionals, practitioners and others from subscribing providers to share practice and experience, and to discuss and debate current issues and promote good practice. Around six to eight events are held annually.⁴⁹

QAA engages with professional, statutory and regulatory bodies through the PSRB Forum, a joint venture with the UK Interprofessional Group, which meets roughly twice a year to share good practice, experiences and ideas of mutual interest.⁵⁰



The Student Advisory Committee ensures that QAA policies and practices are student-centred, and facilitates discussion on developments within the sector.⁵¹



QAA has worked with alternative providers to enhance their higher education provision through events such as the Alternative Providers' Enhancement Conference. Various themes have been addressed in these conferences, including an explicit focus on enhancement to prepare providers for the new review method in 2015-16 and workshops on effective use of the Quality Code. Content is driven by discussion at the QAA Alternative Provider Liaison Forum. QAA works collaboratively with other organisations to encourage the enhancement of provision, and conference plenaries and workshops have therefore also been led by other agencies such as Supporting Professionalism in Admissions (SPA), HESA and the Office of the Independent Adjudicator (OIA).⁵²

In Scotland, the Quality Enhancement Framework (QEF) was developed in 2003 and is based on the principle that quality activities in an effective and mature higher education system should not focus solely or primarily on threshold issues of quality assurance but on the ongoing enhancement of provision.⁵³ Enhancement has been fully integrated into the approach taken to quality assurance, through an enhancement-led review methodology and developmental framework. The higher education QEF is based on three principles of high quality learning, learner engagement and a quality culture. The distinctive Scottish approach, particularly in relation to universities, is recognised internationally as being successful in sustaining and promoting quality.

⁴⁷ Good practice case studies: www.qaa.ac.uk/research/analysis/case-studies

⁴⁸ Call for case studies:

www.qaa.ac.uk/about-us/subscriber-services/good-practice-case-studies

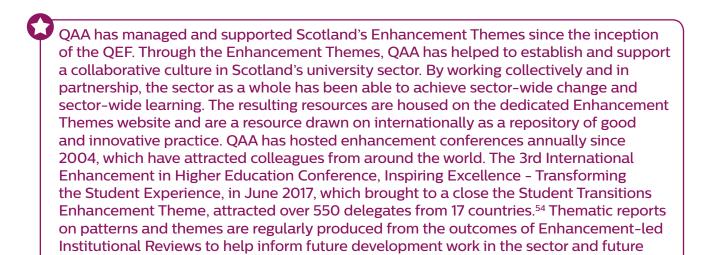
⁴⁹ QEN events: <u>www.qaa.ac.uk/research/quality-enhancement-network</u>

⁵⁰ PSRB activity: www.qaa.ac.uk/partners/professional-bodies

⁵¹ Student Advisory Committee: www.qaa.ac.uk/partners/student-engagement/advisory-board

⁵² Alternative Providers Enhancement Conference programme

⁵³ Quality Enhancement Framework (as above)



Scotland's new Enhancement Theme, which will run until 2020, is Evidence for Enhancement: Improving the Student Experience. This will provide a focus for work around how data, performance indicators, outcomes and learning analytics can be used effectively to improve the student experience in practice. 56

collaborative activity between QAA and the sector. 55

Evidence for Enhancement is a very pertinent topic that will enable QAA to work UK-wide and with its M5 partners to support innovation and change.

QAA produces outwardly focused reports that draw on its UK-wide evidence base and themes emerging from our reviews. These are published as thematic papers or viewpoints.⁵⁷ QAA also identifies research areas and themes for investigation. Details can be found in section 9.4.

Student engagement

QAA works with students as partners in quality assurance, involving them in governance and review activities. There are two student members of the QAA Board (who are also the co-Chairs of the Student Advisory Committee, which aims to represent the different nations of the UK and the diversity of higher education provision as far as possible). There is one student member on the Advisory Committee on Degree Awarding Powers (ACDAP), and 17 members drawn from across UK HE providers on the QAA Student Advisory Committee. QAA works with students to develop QAA policy and the Quality Code, and as readers for Subject Benchmark Statements. There are student members on the QAA Scotland Strategic Advisory Committee and QAA Wales Strategic Advisory Committee, and on the committees that manage and oversee the work of the Enhancement Themes. Guides are published to help students, both UK and international, in their understanding of what QAA does and how they can become involved.

QAA runs two distinct annual conferences for students and quality professionals focusing on the challenges of, and showcasing good practice in, active student engagement. Quality Matters is held in the autumn, with a focus on new and recently appointed

www.qaa.ac.uk/en/ReviewsAndReports/Pages/Enhancement-led-Institutional-Review.aspx

⁵⁴ International Enhancement in Higher Education Conference: www.enhancementthemes.ac.uk/conference

⁵⁵ ELIR thematic reports:

⁵⁶ Current Enhancement Theme: <u>www.enhancementthemes.ac.uk/enhancement-themes/current-enhancement-theme</u>

⁵⁷ QAA Viewpoint: www.qaa.ac.uk/newsroom/viewpoint

⁵⁸ Student engagement overview: <u>www.qaa.ac.uk/partners/student-engagement</u>

student sabbatical officers and institutional staff employed with a remit in student engagement. In spring/summer, a second conference is held, aimed at officers and staff who have been in post for longer, with a focus on evolving student engagement.

QAA involves students as full and equal members of review teams across its review methods. QAA has trained over 300 student reviewers since the last ENQA review and there are currently more than 50 trained student reviewers available to take part in review activities. In response to that review, since 2015–16 student reviewers have joined review panels for degree awarding powers, International Quality Review, unsatisfactory quality investigations in England, and TNE. Many of the students involved in QAA reviews go on to successful careers in university and college administration and students' unions.

QAA also supports students at providers undergoing review to enable them to make a full and active contribution to the review process. Their contribution is manifest in three main ways, depending on method:

- through the provision of a submission to the review team, conveying the students' perspective of the provider under review
- through the identification of a lead student representative at the provider, who may advise the review team during the review and help the team to select students to meet
- by meeting with the review team during the visit.

In ELIR, students are expected to be fully involved in the production of the institution's Reflective Analysis.

Since 2011, over 400 lead student representatives have participated in QAA review methods. In addition, QAA supports students involved in the review process by providing guidance, training events and briefings.⁵⁹



Peer review

QAA is committed to using peers as reviewers in all of its processes and methodologies. Details of how reviewers are recruited, selected, trained and monitored, as well as the opportunities provided to them for development, can be found in section 10.4 (Standard 2.4).

⁵⁹ Survival Guide for Lead Student Representatives:

www.qaa.ac.uk/publications/information-and-guidance/publication?PublD=3135

⁶⁰ http://tsep.org.uk

^{61 &}lt;a href="http://wisewales.gaircymraeg.cymru">http://wisewales.gaircymraeg.cymru (temporary URL)

^{62 &}lt;a href="http://wisewales.gaircymraeg.cymru/resources/annual-quality-reports">http://wisewales.gaircymraeg.cymru/resources/annual-quality-reports

^{63 &}lt;u>www.sparqs.ac.uk</u>

Working in partnership



QAA consults and works in partnership with a wide range of stakeholder groups with an interest in the quality of UK higher education. These include:

- students and the UK's National Union of Students⁶⁴
- governments and government bodies across the UK
- politicians across the political spectrum
- civil servants and policy makers across the different countries of the UK
- higher education funding bodies
- other higher education sector agencies
- representative bodies and mission groups for higher education
- individual higher education providers
- higher education staff
- employers
- PSRBs and representative groups for such bodies, for example Professions Together.

QAA is a member of a range of leadership groups in the UK, developing thinking and policy in key areas for higher education, including:

- quality assessment and baseline regulatory requirements
- higher and degree apprenticeships
- transnational education
- enhancement
- student engagement and participation.

In addition to our partnerships in the UK, QAA has expanded and maintained relationships with a number of international quality assurance agencies and higher education organisations. Formal memoranda and agreements form the foundations of these relationships. The partnerships established with international quality assurance agencies are listed in section 8.

Review activity

Higher Education Review: Alternative Providers

Higher Education Review (Alternative Providers - HER AP) is QAA's review method for alternative providers that provide full programmes leading to their own awards or awards from a partner provider with degree awarding powers. 66 These methods are UK-wide, and QAA therefore reviews a small number of alternative providers in Scotland and Wales.

The provider applies directly to QAA to schedule it for a HER AP. Although the outcomes of the reviews inform regulatory decisions made by some of the UK Governments, governments have no involvement in the review process and QAA has no contractual relationship with any government to provide these reviews. QAA is the body approved by government to provide an assessment of quality in order that providers can apply to recruit international students and/or access student funding.

^{64 &}lt;u>www.nus.org.uk</u>

⁶⁵ QAA's MoUs (under International Partners tab): www.qaa.ac.uk/about-us/corporate-governance

⁶⁶ HER AP review method: www.qaa.ac.uk/publications/information-and-guidance/publication?PublD=3174

HER AP has two components. The first component is an external quality assurance review to confirm that the provider meets UK expectations for academic standards, quality, information and enhancement. This review reflects the common principles of QAA review described in the summary of common principles set out at the start of section 6.

The second component of this review method is a check on financial sustainability, management and governance ('the FSMG check'), which has 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 is conducted entirely separately from the review of quality assurance arrangements.⁶⁷

Other review methods for alternative providers

QAA operates a further four review methods for other types of alternative provider.⁶⁸ All four of the review methods described below represent variations on the primary HER AP method and reflect the common principles of QAA review described in section 6.

- Embedded colleges operating networks of colleges that provide preparatory programmes for international students. Where these providers are recruiting students who are not EEA nationals, they are subject to educational oversight from QAA and are reviewed under the HER (Embedded Colleges) method. There are 42 of these on QAA's review schedule.
- Embedded colleges operating as autonomous providers with close links to a single higher education institution (normally a university). Where these providers are recruiting students who are not EEA nationals, they are subject to educational oversight from QAA and are reviewed under the Educational Oversight Exceptional Arrangements method. There are five of these on QAA's review schedule.
- Overseas providers operating in the UK, of which there are two main types:
 - recognised overseas providers offering full courses in the UK leading to non-UK awards - where these providers are recruiting students who are non-EEA nationals, they are subject to educational oversight from QAA and are reviewed under the HER (Foreign Providers) method
 - '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 (also known as 'study abroad providers') - where these providers are recruiting students who are non-EEA nationals, they are subject to educational oversight from QAA and are reviewed under the Review Scheme for Educational Oversight method.

In aggregate, there are 20 overseas providers on QAA's review schedule.

Annual monitoring (for alternative providers)

Alternative providers subject to review by QAA undergo a full review every four years and annual monitoring between full reviews.⁶⁹ Monitoring serves as a short check on the provider's continuing management of academic standards, the management and enhancement of the quality of learning opportunities, and the information it publishes about its academic provision.

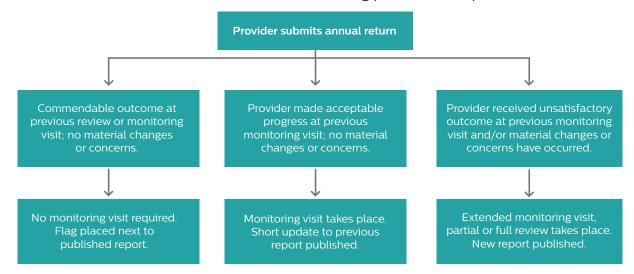
⁶⁷ Information on FSMG check:

www.qaa.ac.uk/en/ReviewsAndReports/Documents/FSMG-guidance-document-2017.docx

⁶⁸ Other HER AP review methods: www.qaa.ac.uk/en/ReviewsAndReports/Pages/Educational-Oversight-.aspx

⁶⁹ Other HER AP methods (as above)

The flow chart below illustrates how the monitoring process takes place.



Monitoring visits are undertaken by small teams comprising a review coordinator and one trained peer reviewer. The visit normally lasts for one day and the review process culminates in the publication of a report on QAA's website.

Enhancement-led Institutional Review (ELIR)

QAA's review method for higher education providers in Scotland is Enhancement-led Institutional Review (ELIR).⁷⁰ Its main focus is to consider an institution's strategic approach to enhancement, placing a particular emphasis on the arrangements for improving the student learning experience. It examines and confirms the institution's ability to secure the academic standards of its awards.

The fourth cycle of ELIR will run from 2017 to 2022. ELIR 4 builds on previous versions of the review method that have been running in Scotland since 2003. ELIR is a distinctive approach to institutional review, developed to address the particular context of the Scottish higher education sector. It also has points of tangency with review methods operating in other parts of the UK and beyond. Each review team will have between four and six external reviewers including senior academics, a student reviewer and a coordinating reviewer.

ELIR not only involves cyclical review but also incorporates an annual discussion with each institution.

Quality Enhancement Review Wales

QAA's review method for regulated providers in Wales is Quality Enhancement Review (QER). Under HEFCW's Quality Assessment Framework (QAF), the governing bodies of regulated providers must commission a review from an EQAR body to demonstrate that they meet baseline regulatory requirements. The aim of QER, therefore, is to inform a provider's governing body, students and the wider public of whether it meets the requirements of the QAF and to encourage improvement. Reflecting the needs of the Welsh sector, it:

- delivers a clear statement on whether the provider meets the ESG Part 1 for internal quality assurance and baseline regulatory requirements
- provides a suite of assurances, differentiated commendations and recommendations for governing bodies
- ensures that the process forms a basis for ensuring action is taken if the management of academic standards or the quality of provision is found to have significant weaknesses.

⁷⁰ ELIR handbook (as above)

⁷¹ Quality Enhancement Review Handbook (as above)

As an enhancement-orientated method, it provides a review structured around the strategic priorities of the provider and the nature of its student body - and how the two interrelate to define the provider's priorities for enhancing the student learning experience.

Degree awarding powers scrutiny

QAA's Advisory Committee on Degree Awarding Powers (ACDAP)⁷² receives and considers applications for degree awarding powers from providers anywhere in the UK. If ACDAP decides that an application should proceed, QAA carries out a scrutiny to determine whether the applicant meets the criteria, which differ according to where the applicant is based and what level of powers it is applying for.⁷³ At the end of the scrutiny process the scrutiny team submits a final report back to ACDAP, on which it formulates a recommendation to the QAA Board. The QAA Board then provides advice to the respective government, for consideration by the Privy Council, which has the authority to grant degree awarding powers.

The scrutiny process is carried out by a team of specially trained peer reviewers, including a student reviewer. The process takes place over 12-18 months. This is to allow the scrutineers to observe a range of meetings and other events through a complete academic cycle. In response to a recommendation made by the 2013 ENQA review panel, QAA now publishes the final scrutiny reports on its website.⁷⁴

International Quality Review

International Quality Review (IQR) offers higher education providers outside the UK the opportunity to have an evidence-based peer review by QAA.⁷⁵ It is designed to analyse and reflect on providers' own quality assurance approaches, to challenge and benchmark their existing processes against the ESG, and to support them to drive improvement and excellence in their own quality assurance approach. Since its inception in 2016, one provider has received an International Quality Review and two are ongoing.

IQR is made up of three stages, described as follows:76

- Application: A provider seeking to undertake an IQR completes an application form demonstrating that it meets the initial requirements. This is scrutinised by a Screening Committee to determine whether it meets the criteria to proceed to the scoping stage.
- Scoping: We conduct a scoping visit to the provider that enables it to learn more about IQR and requirements for a review, and enables QAA to determine whether the provider is suitable to proceed to a full review.
- Review: The review is an opportunity for the provider to demonstrate how it meets each of the 10 Standards set out in Part 1 of the ESG through a self-evaluation document and evidence. The review team, comprising at least one UK reviewer, one international reviewer and one student reviewer, analyses these documents and visits the provider to meet staff, students and others. The review team gathers evidence to confirm whether or not the provider meets the ESG. QAA publishes its report and the provider publishes its action plan in response. Successful providers are eligible to use the QAA IQR Graphic.

⁷² Advisory Committee on Degree Awarding Powers: <u>www.qaa.ac.uk/assuring-standards-and-quality/daput/ac-dap</u>

⁷³ Degree awarding powers guidance: www.qaa.ac.uk/assuring-standards-and-quality/daput/guidance-and-criteria

⁷⁴ Reviews and reports: www.qaa.ac.uk/reviews-and-reports

⁷⁵ International Quality Review: <u>www.qaa.ac.uk/about-us/commercial-and-international-services/international-guality-review</u>

⁷⁶ IQR handbook

Quality Review Visit

Quality Review Visit (QRV; Gateway) is part of the new operating model for the quality assessment of publicly funded providers in England and Northern Ireland from 2016.⁷⁷ Its purpose is to test providers seeking entrance to the publicly funded part of the sector against the baseline regulatory requirements (which include the expectations of the Quality Code), to ensure that the provider is able to deliver a high-quality student academic experience and that academic standards are secure. It also applies to a number of higher education providers in England and Northern Ireland (FECs) that had not been through two QAA reviews before the revised model was introduced.

Quality Review Visit is carried out by teams of trained peer and student reviewers:

- Stage 1: Provider briefing by QAA
- Stage 2: Provider prepares and sends a submission to the review team
- Stage 3: Desk-based analysis of submission and supporting evidence by the review team
- Stage 4: On-site visit
- Stage 5: Reporting the outcomes.

The outcomes of the QRV are considered by the relevant funding body in reaching its broader judgement about the provider's readiness to enter the higher education sector, or to remain in, or exit, the developmental period.

General Osteopathic Council Review

The General Osteopathic Council (GOsC) is the statutory regulatory body in the UK for osteopaths and osteopathic education providers. Only graduates from courses that are recognised by the GOsC may register with the GOsC and practise osteopathy legally.

Decisions concerning the granting, maintenance and renewal of recognised status are made following reviews of osteopathic courses and course providers. These reviews are conducted by QAA, under contract from the GOsC. 78 GOsC has renewed its contract and has stated that it finds the independent advice from QAA to be very helpful to its Education Committee, allowing it to ensure that the decisions it takes are in line with wider higher education practice. The review method is known as GOsC Review. There are currently 10 providers of recognised osteopathy courses in England and Wales.

GOSC Review is conducted by teams of specially trained peer reviewers (known as 'visitors' in GOSC Review) according to the basic review model and common principles described in the summary at the start of section 6. Specific differences between GOSC Review and other QAA review methods include:

- review teams include members who are qualified osteopaths
- visitors consider the GOsC's Osteopathic Practice Standards, as well as the Quality Code, in coming to their judgements
- GOSC has recently stated, on reading a draft of this SAR, that it is considering using student reviewers in future cycles of review.

Review reports are published on the GOsC website.⁷⁹

⁷⁷ QRV handbook: www.qaa.ac.uk/en/ReviewsAndReports/Pages/Quality-Review-Visit.aspx.

Note: In discussions with HEFCW the method may be tailored for, and extended to, Wales in 2018.

⁷⁸ GOsC review: <u>www.qaa.ac.uk/reviews-and-reports/how-we-review-higher-education/general-osteo-pathic-council-review</u>

⁷⁹ www.osteopathy.org.uk/training-and-registration/becoming-an-osteopath/training-courses

Unsatisfactory Quality Investigations

Unsatisfactory Quality Investigations (UQI) are part of the new operating model for the quality assessment of publicly funded providers in England and Northern Ireland.⁸⁰

The investigations are of concerns about the academic standards and quality of the educational provision of publicly funded providers in England and Northern Ireland. These concerns may be reported to the funders by students, staff and other stakeholders, or arise through the funders' other interactions with the providers they fund.

QAA carries out UQIs on behalf of HEFCE and DfE(NI). In discussions with HEFCW, QAA understands that the method may be tailored for, and extended to, Wales in 2018.

UQIs comprise two stages, as follows.

- Stage 1 an initial analysis of the concern to establish whether there is evidence of a serious issue that requires further investigation. This stage is operated by HEFCE and may result in the case being closed without the need to progress to stage 2.
- Stage 2 a detailed investigation into the concern carried out by QAA, upon referral from HEFCE.

Stage 2 investigations are carried out by teams of trained peer reviewers (a student reviewer is included when the investigation relates to a matter that directly impacts on the student experience). The investigation is conducted according to the basic review process common to most QAA methods:

- preparation and submission by the provider under investigation of a self-assessment and supporting evidence
- desk-based analysis of the submission and supporting evidence by the peer review team
- a visit to the provider, normally to include meetings with students and staff
- a report of the review findings, which is shared in draft form with the provider for comments on matters of factual accuracy.

UQIs by QAA result in a report to the relevant funding body, which is then responsible for making a judgement about the case.

QAA Concerns Scheme

QAA's Concerns Scheme is the corollary of the UQI process for alternative providers.⁸¹ It operates according to the same four-stage process outlined above. The two main differences between the Concerns Scheme and UQI are that:

- in the Concerns Scheme, QAA undertakes the initial analysis of the concern to establish whether full investigation is required
- the outcome of a full investigation under the Concerns Scheme is a report published on QAA's website.

QAA Scotland has developed the Scottish Concerns Scheme.⁸² It is intended to have a similar role to the arrangements that operate in other parts of the UK. QAA Scotland is able to investigate concerns about academic standards and quality raised by students, staff and other parties. Where such concerns indicate serious systemic or procedural problems, a detailed investigation is conducted. The Scottish Concerns Scheme sets out the arrangements by which that can happen. The aim of the Scheme is to promote public confidence in the Scottish university sector by offering a responsive means for exploring cases that are brought to QAA's attention outside the regular review arrangements.

^{80 &}lt;u>www.hefce.ac.uk/reg/forstudents/qualityissues</u>

⁸¹ Concerns: <u>www.qaa.ac.uk/concerns/concerns-about-providers</u>

⁸² Scottish Concerns Scheme: www.qaa.ac.uk/publications/information-and-guidance/publication?PublD=3113

Transnational higher education (TNE)

TNE Review is the review process through which QAA promotes and maintains the academic quality and standards of UK transnational higher education (TNE).⁸³ The objectives and process for TNE review are clearly and explicitly set out in the TNE review handbook. TNE Review is aligned with, and complements, the new model for quality assessment in England and Northern Ireland, QAA's Enhancement-led Institutional Review in Scotland, and the Quality Assessment Framework for Wales.

QAA carries out TNE Review under contract from the four UK higher education funding bodies, and TNE activity is reported to the UK-wide Standing Committee for Quality Assessment. Its purposes are to:

- test the implementation of policies and processes for safeguarding standards and enhancing the quality of TNE provision
- gain a detailed understanding of the TNE student experience
- disseminate good practice in TNE provision to the whole UK higher education sector
- enhance cooperation with quality assurance bodies in UK TNE host countries.

TNE Review is carried out by teams of peer reviewers. TNE review teams are small; therefore, all reviewers, including student reviewers, must have relevant expertise that will add to the overall capacity of the team to carry out the review. Selection and recruitment of students is carried out in the same way as the recruitment of any other team member and may or may not result in the recruitment of a student to a specific review team. The reviewers are guided by the Expectation of the Quality Code, Chapter B10: Managing Higher Education Provision with Others.

The stages of the review process are:

- a scoping exercise to ascertain the extent of provision in the country in which the review is taking place
- desk-based activity by the peer review team to select the sample of provision that will be looked at either through home and/or in-country site visits. The sample aims to be representative in terms of types and size of provision, disciplinary area if possible, and will take into account representation from the four nations if relevant. It will also take into account intelligence from local agencies and/or any thematic angle that might characterise a particular TNE review round (for example, possible joint review activity, top-up arrangements, or areas of concern for a local partner agency).
- request for an information set from each provider
- site visits (either home and/or in-country).

TNE Review culminates in the publication of three types of report:

- quality assurance reports on the TNE arrangements of the individual providers selected for review, offering recommendations and highlighting areas of good practice
- case studies aimed at providing a better understanding of specific aspects of TNE provision and facilitating the sharing of good practice
- a country overview report, outlining the scale and scope of UK TNE in the selected country of review, the local operating environment and the key thematic findings from the review and case study visits. TNE is an enhancement-oriented process. It does not issue formal judgments on a providers' capacity to manage TNE provision in general, since it focuses on one single TNE arrangement among many that the provider may have.

⁸³ TNE Review: www.qaa.ac.uk/reviews-and-reports/how-we-review-higher-education/review-of-over-seas-provision

Other activities outside the scope of the ESG

Access to Higher Education authorisation

Access to Higher Education (Access to HE) courses are designed for people who want to take a university-level course, but who do not have the necessary qualifications. Courses are available at colleges and alternative providers across England and Wales, in a wide range of subjects. QAA's Access to HE activity is funded by HEFCE in England.⁸⁴

QAA is responsible for assuring the quality of recognised Access to HE courses. To meet these responsibilities, QAA licenses regionally-based Access Validating Agencies (AVAs), authorising them to recognise Access to HE programmes and to award Access Diplomas to students. QAA developed the Recognition Scheme for Access to Higher Education and, in September 2016, introduced a new risk-based annual cycle of monitoring activities and revised criteria for AVA licensing. In addition, QAA provides advice to the governments across the UK on the Access to HE programme, as required.

Capacity building services

QAA offers a number of specially designed services aimed at supporting the development of quality assurance and quality assurance professionals worldwide. This includes capacity building programmes, training and consultancy for universities, governments and quality assurance agencies, for example this can include training reviewers, or supporting the establishment of review programmes and evaluations. For example, QAA was contracted by the Ministry of Education and Sport in Albania to carry out institutional-level review of its higher education providers with a view to building capacity in both the institutions and the national quality assurance agency, as well as increasing public trust in the national higher education system.⁸⁵

QAA offers a five-day International Quality Assurance Programme (IQAP), a face-to-face international training course for non-UK higher education professionals. The programme includes a number of expert and external speakers and, when held in London, a site visit to a UK university.

QAA also offers a Concepts of Quality online training programme. Designed as an introduction to UK higher education quality assurance, it is aimed at professionals new to quality assurance.

⁸⁴ Access to HE: www.accesstohe.ac.uk

⁸⁵ Albania MoU: <u>www.qaa.ac.uk/en/AboutUs/Documents/MoU-QAA-Albanian-Ministry-of-Education-and-Sport.pdf</u>

7 Agency's internal quality assurance

QAA is accountable to its funders and other stakeholders through a comprehensive range of internal quality assurance mechanisms. These are discussed in detail in section 9.6 (Standard 3.6) and include:

- performance management and accountability
- assurance of internal controls
- risk management
- internal audit
- equality
- information security and accessibility
- policies
- avoiding conflicts of interest
- subcontractors
- feedback and reflection mechanisms.

8 Agency's international activities

QAA and the UK higher education sector continue to benefit from engagement with European and wider international quality assurance developments.⁸⁶ QAA takes a proactive role in international developments in standards and quality, driven by its international strategy,⁸⁷ which has three main goals:

- to engage in international activity that supports UK higher education and provides positive returns for QAA's subscribers that they recognise and value
- to deliver TNE reviews, country reports and international engagement under the funding bodies' contract for international activities
- to create, promote and manage products and services for the international market that build and extend the regard for the UK HE system and deliver a return to QAA.

The main types of international engagement activities QAA carries out to achieve these strategic aims include:

- engaging with international stakeholders, including ministries, quality assurance bodies and higher education providers, to improve their understanding of the UK higher education and quality assurance system
- quality assuring UK TNE, and reassuring international stakeholders about the quality of UK TNE
- facilitating the sharing of good practice across the sector on how to ensure the best quality learning experience for international students studying in the UK and overseas
- providing expert advice to UK higher education providers and sector bodies about the local operating environments of key countries for UK TNE and international developments in quality assurance
- contributing to the shaping of international and national policy
- supporting overseas governments, agencies and providers in developing external and international quality assurance mechanisms.

Review methodologies

Review of transnational education (TNE)

The quality assurance of UK TNE is delivered by:

- reviewing UK TNE, both as part of in-country reviews and in Scotland and Wales as part of institutional reviews⁸⁸
- providing information about the UK approach to TNE and its quality assurance to international stakeholders
- seeking to strengthen cooperation with host countries' quality assurance agencies, with a view to developing more efficient and effective ways to quality assure UK TNE, both through our bilateral partnerships and multilateral networks and initiatives (see below).

This work forms part of the contract with the UK's funding bodies and is UK-wide in remit. See also page 31.

⁸⁶ QAA Proposed Approach to International Strategic Engagement

⁸⁷ QAA International Strategy

⁸⁸ TNE Review (as above)

International Quality Review (IQR)

IQR offers higher education providers outside the UK the opportunity to have an evidence-based peer review by QAA. The key criteria for IQR are the Standards set out in Part 1 of the ESG.⁸⁹ See also page 28.

Strategic engagement

Membership of networks and organisations

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

QAA is a member of the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) and has observer status on the Asia-Pacific Quality Network (APQN). QAA is also a member of the Council for Higher Education Accreditation (CHEA) International Quality Group, the Quality Beyond Boundaries Group (QBBG) and the Cross-Border Quality Assurance Network (CBQAN).

Membership of these networks and organisations is essential for QAA's own development and involvement in global debates, the outcomes of which may impact on the UK higher education sector. Within each of these organisations, QAA is involved in various discussions and projects, with the aim of increasing its own knowledge of the world in which it works, disseminating UK practice and ensuring that involvement in key topics can be used to support the work of the UK sector.

Memoranda of Understanding with key strategic partners



QAA continues to engage on a regular basis with strategic partner agencies. We have established bilateral Memoranda of Understanding (MoUs) and Letters of Intent (LoIs) which aim at sharing information, enhancing mutual understanding, exploring and facilitating cooperation in the quality assurance of cross-border provision, and engaging in specific joint projects (see below under 'Projects').⁹⁰

QAA is selective in its approach to signing MoUs. Its strategic approach is to ensure that such partnerships are directly related to those countries in which there is significant internationalisation activity in the sector, with the aim of facilitating that activity through providing evidence of the sound standing of UK higher education provision (TNE review) and working with partners on matters and projects of mutual interest and benefit. Lols are used to test out such partnerships in any new areas, without immediately committing to a full MoU agreement. All MoUs must be active partnerships involving regular communication and activity.⁹¹

Support for the Department for Education and the UK nations in their work with the Bologna Follow Up Group (BFUG)

The UK BFUG Stakeholders Group meets several times a year to inform UK participation in the BFUG. QAA regularly participates in UK BFUG meetings and provides advice to UK Governments to inform the UK position at BFUG meetings on quality assurance-related matters. In the past year, QAA has, at the request of the DfE, represented the UK on Working Group 2 (Implementation of the Bologna Process) and has also represented the UK at the meeting of national correspondents for qualifications frameworks (QF-EHEA) in Strasbourg in September 2017. QAA assisted the Scottish Government in assembling information for the most recent update of the benchmarking exercise. 92

⁸⁹ International Quality Review (as above)

⁹⁰ QAA's MoUs (as above)

⁹¹ QQI_QAA bilateral 16-12-16 (example meeting)

⁹² QAA support to DfE on BFUG

Relevant UK partnerships (Jisc/BC/HE Global/UUKi)



Working with QAA's UK partners, such as Universities UK International (UUKi)⁹³ and the British Council (BC),⁹⁴ allows for a coherent approach to the international work carried out across the various bodies in the name of the UK sector. For example, QAA works closely with HE Global⁹⁵ (a jointly funded initiative between UUKi and the BC) to provide support to UK higher education providers involved in TNE. QAA is a member of the HE Global Advisory Board and HE Global. The BC is assisting QAA in the production of country reports. These are part of the contract with the UK's funding bodies and are designed to provide the HE sector with up-to-date, useful information on key TNE host countries. While QAA takes the lead on the report, each organisation contributes according to its own strengths. Thus, the reports are more rounded and provide detailed information from various points of view and expertise.⁹⁶

Projects and other related activities

QAA participates in projects organised by both the networks and the organisations of which it is a member, for example the Quality Assurance of Cross Border HE, led by ENQA (QACHE)⁹⁷ and EU Support to Higher Education in the ASEAN Region (SHARE).⁹⁸ QAA has worked closely with ENQA through its participation in both of these projects, and its Chief Executive chaired the ENQA staff development group, which established a competencies framework for quality assurance professionals in quality assurance agencies. It is also involved in inter-agency work organised through its strategic MoUs; for example, we are working closely with HKCAAVQ to look at the possibility of a joint approach to TNE review of UK provision in Hong Kong.

QAA also actively participates in the general assemblies of membership organisations as well as in other international conferences. It is often invited to deliver keynotes or facilitate working sessions at conferences overseas or those with an international focus in the UK.

Capacity building services overseas

Capacity development and consultancy work play an important function in cementing the UK as one of the leading countries in higher education and quality assurance. Activities falling under this area of work include:

- system-to-system contracted work to help with developing and/or implementing quality assurance reference points and processes
- external quality assurance services to non-UK higher education providers
- capacity development training to non-UK quality assurance practitioners.

This work cannot be funded by UK income and so must be charged for at a commercial rate. QAA views all such work as a learning process: either through learning from engagement with new international partners or through gaining new information that may be of use to the UK sector in its international endeavours.

- 93 www.universitiesuk.ac.uk/international
- 94 <u>www.britishcouncil.org</u>
- 95 <u>www.universitiesuk.ac.uk/International/heglobal</u>
- 96 Country Report: Pakistan:
 - www.gaa.ac.uk/en/Publications/Documents/Country-Report-Pakistan-2017.pdf
- 97 <u>https://qache.wordpress.com</u>
- 98 http://share-asean.eu

9 Compliance with European Standards and Guidelines (Part 3)

9.1 ESG Standard 3.1: Activities, policy and processes for quality assurance

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

NB: In the light of the number of review methods that are within scope for this review, and in the interests of maintaining the SAR at a reasonable length, QAA has provided a table in Annex 2 that sets out the key principles of the ESG and maps adherence from each relevant review method against them.

QAA meets this Standard for each of the activities described in section 6. Each activity is carried out according to its own schedule and has its own explicit goals and objectives as contained in a published handbook or similar (normally within the opening section). Hyperlinks to these handbooks are provided in section 6 under 'Review activity'.

The goals and objectives of QAA's external quality assurance activity translate directly and explicitly into their design, operation and outcomes. This is manifest in the guidance given to providers on preparing for the activity, in the way in which review teams are trained to structure their analysis of evidence and the questions they ask of staff, students and other stakeholders, and in the way in which the conclusions of the activity are expressed in the published reports.

Stakeholders are involved in QAA's governance, as described in the section on 'QAA Board' on page 15. They are also involved in the design, monitoring and evaluation of QAA's external quality assurance activities in a variety of ways according to the particular activity, for example through consultation on the development and review of each review process.

Section 10 of this report specifies how our review methodologies meet the criteria of Part 2 of the ESG, while at the same time demonstrating how we translate our mission and the Agency's aims into our daily work. All of our review methodologies aim to fulfil the mission of QAA 'to safeguard standards and improve the quality of UK higher education wherever it is delivered around the world'. Our latest strategy sets out our aims for fulfilling this mission.

9.2 ESG Standard 3.2: Official status

Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

QAA meets this Standard, as it is an independent body, a registered charity and a company limited by guarantee (see section 9.3 below).

All of the review activities that QAA carries out are intended to help providers to reflect on the quality of the higher education they offer and to identify ways in which students' experiences may be improved. In addition, the outcomes of some activities are used by others for specific regulatory purposes. By whom and how the outcomes

are used depends on the provider and the activity, as set out below. In each case, a full explanation of how the outcome is used is published by QAA and/or by the body that uses the outcome.

- For publicly funded providers in England and Northern Ireland, the outcomes of Quality Review Visits and Unsatisfactory Quality Investigations conducted by QAA help HEFCE and the Department for the Economy in Northern Ireland respectively to discharge their statutory duties for quality assessment.⁹⁹
- For publicly funded providers in Scotland, the outcomes of QAA's Enhancement-led Institutional Reviews help the Scottish Funding Council to discharge its statutory responsibility for quality assessment and quality enhancement.¹⁰⁰
- For regulated providers in Wales, it is a condition of the new Quality Assessment Framework that they undergo a review from a body on the European Quality Assurance Register every six years. Universities Wales has commissioned QAA to be the independent external quality reviewer on behalf of all universities in Wales; thus, the outcomes of QAA review in Wales will play an important role in the new Quality Assessment Framework.¹⁰¹
- For publicly funded providers across the UK, TNE reviews help the funding bodies to discharge their statutory responsibilities for quality assessment of provision overseas.
- For alternative providers, the outcomes of QAA's review activities (including cyclical reviews and investigations under the Concerns Scheme) are used by governments to inform decisions about educational oversight and specific course designation. Negative outcomes from QAA review may lead to the withdrawal of a licence from the Home Office to recruit students who are not EEA nationals and/or withdrawal of specific course designation.¹⁰²
- For alternative providers with degree awarding powers, the outcomes of QAA's review activities are used by the Privy Council to inform its decision about the renewal of degree awarding powers.
- For applicants for degree awarding powers, the outcome of QAA's scrutiny is used by the Privy Council to determine whether it will grant the powers applied for.¹⁰³
- For osteopathic education providers, the outcome of QAA's General Osteopathic Council Review informs the decision by the General Osteopathic Council about the award of Recognised Qualification status, which is also subject to Privy Council approval in accordance with the Osteopaths Act 1993. Only osteopaths registered with the General Osteopathic Council may practise as osteopaths in the UK. Graduates from programmes with Recognised Qualification status are eligible to apply for registration.¹⁰⁴

9.3 ESG Standard 3.3: Independence

Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third-party influence.

QAA meets this Standard, as it is an independent body, a registered charity and a company limited by guarantee.

⁹⁹ www.hefce.ac.uk/reg/QualityAssessment

¹⁰⁰ Overview report 2015-16 to SFC

^{101 &}lt;u>www.hefcw.ac.uk/policy_areas/learning_and_teaching/teaching_quality_assurance.aspx</u>

^{102 &}lt;u>www.gov.uk/government/publications/sponsor-a-tier-4-student-guidance-for-educators; www.gov.uk/government/publications/specific-course-designation-alternative-higher-education-providers</u>

¹⁰³ DAP and UT arrangements (as above)

¹⁰⁴ GOsC review (as above)

QAA's Board is responsible for developing and overseeing the organisation's strategic direction, policy development, finances and performance. Board members represent a wide range of interests, within higher education as well as other areas. Some members are appointed for their experience of industry, commerce, finance or the practice of a profession, and we have two student members. We also have members appointed by bodies representing UK higher education institutions and by the higher education funding councils.¹⁰⁵

QAA has legal responsibilities (for example, according to the Charities Act 2011) to provide benefit to the public and is required to produce an annual report outlining how it is achieving this.¹⁰⁶ The Charity Commission, the regulator for charities in England and Wales, makes it clear that charities must be independent from governmental authorities: '... [a charity] must exist in order to carry out its charitable purposes, and not for the purpose of implementing the policies of a governmental authority, or of carrying out the directions of a governmental authority.' QAA's key objectives are set out in official company documentation.¹⁰⁷

In terms of QAA's operational activities, the responsibility for judgements in review processes lies solely with the review teams, according to the processes and criteria specified in the relevant review description or handbook. Higher education providers have the right to suggest corrections of factual error and may appeal a judgment, but neither they nor any other stakeholder have any means of influencing the review teams' judgments.

QAA is fully responsible for the appointment of reviewers to review teams and for the final outcomes of its quality assurance processes. QAA's selection criteria for reviewers include mechanisms to avoid conflicts of interest (see compliance with Standard 2.4) as part of the process of reinforcing the independence of the judgements reached.

9.4 ESG Standard 3.4: Thematic analysis

Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

QAA meets this Standard through its work analysing data and regularly publishing reports. These findings describe and analyse the patterns across its external quality assurance activities.

QAA produces reports that draw on its evidence base and themes emerging from reviews. Thematic papers or viewpoints are produced. At the highest level, QAA's Annual Reports contain an overarching view on QAA's activities and their outcomes. At a more detailed level, through conducting the analysis, QAA also identifies research areas and themes for investigation, and commissions external research. The gathered intelligence informs the focus for sector enhancement events, feeds into the UK policy-making process and shapes QAA's direction and focus. QAA also invites providers to submit case studies sharing their good practice. Since 2014, QAA has published 63 case studies covering areas including assessment strategies, employer engagement, programme offer and retention.

Thematic analysis is used to shape enhancement activity. For instance, since 2014-15 a dominant topic arising from the analysis of ELIR reports has become a 'Focus On' project. The first of these was on Assessment and Feedback, a perennial issue arising from student surveys, and in review reports; the second was on Managing Collaborative Activity - another common area of challenge and complexity. Outputs from Focus On: The Postgraduate Student Experience have been requested as part of conferences

¹⁰⁵ QAA Board members (as above)

^{106 &}lt;a href="http://beta.charitycommission.gov.uk/charity-details/?regid=1062746&subid=0">http://beta.charitycommission.gov.uk/charity-details/?regid=1062746&subid=0

¹⁰⁷ Articles of Association (as above)

¹⁰⁸ Analysis reports: www.qaa.ac.uk/research/analysis/review-findings; ELIR thematic reports (as above); Viewpoints (as above); QAA annual report 2016 (as above)

across the UK.¹⁰⁹ QAA has also produced analysis and thematic reports on the findings from reviews across the UK.

QAA has also developed, and is managing, a Knowledgebase that keeps a record of all recommendations, affirmations and features of good practice. It can be searched online and is publicly available. To Filters within the Knowledgebase provide opportunities for detailed analysis by publication date, themes, chapters of the Quality Code, or by using the keyword search.

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QAA has recently begun work with Jisc and HESA on the Business Intelligence Analytics Labs project, looking at how higher education data can be used to improve the student experience through development of data dashboards. The other partners we have worked with on research include the British Council, Higher Education Academy (HEA), Association of Colleges (AoC), Association of Graduate Recruiters, Chartered Association of Business Schools, Chartered Management Institute (CMI) and the National Union of Students (NUS), as well as many providers.

Analysis process

Since its last ENQA review, QAA has developed a more systematic approach to analysis. Using NVivo software enables the Agency to store and interrogate all review reports, as well as wider qualitative information that is collected, for example from minutes of meetings between QAA staff and providers, as part of the subscriber liaison scheme. A key advantage of using such software is being able to identify and analyse themes more effectively, and has resulted in thematic work on Sub-Degree Education in UK Higher Education, Digital Capability and Teaching Excellence, Cultures of Quality, Transition Experiences of Entrants to Higher Education, and Student Satisfaction Data.

QAA is confident that it meets this Standard. However, research and analysis is an area where there is always more that can be done. QAA continues to seek to improve its work in this area, with emphasis on ensuring that analysis feeds into future activity, and that there is confidence to deal with sensitive findings. QAA also acknowledges the need to develop a more strategic focus to analysis.

9.5 ESG Standard 3.5: Resources

Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

QAA meets this Standard: it is adequately funded and resourced to undertake its work in an effective manner.

As described in other sections of this report, QAA's work covers external quality assurance activity of UK higher education providers, as well as wider activity including providing advice and guidance in the area of quality assurance and delivering contract work, often in an international context. QAA continues to monitor and review its resources to ensure that they are appropriate, and to ensure that the Agency remains in a position to provide stability following, and preceding further, significant changes to external quality assurance systems in the UK.

^{109 &#}x27;Focus On' project: www.enhancementthemes.ac.uk/focus-on

¹¹⁰ QAA Knowledgebase (as above)

¹¹¹ Analytics Labs: www.qaa.ac.uk/newsroom/qaa-develops-quality-assurance-data-dash-boards-in-partnership-with-jisc-and-hesa

Human resources

QAA undertook a restructure of the organisation to reflect the changing nature of its work, following changes to the quality assessment landscape in the UK. The new structure more directly aligns with the diverse nature of UK higher education and the providers with which QAA works; with the new directorate areas highlighting the value of our work with universities, colleges, and alternative providers; and the devolved nature of UK higher education and the international emphasis of the sector's work.

QAA is committed to recruiting and retaining skilled and talented staff and to their continuing professional development. QAA currently has 147 staff (119.9 full-time equivalent) who bring experience from within the higher education sector, from other professional backgrounds, and from a range of national and international contexts. To ensure that it can meet the demands of its work, QAA has adopted a flexible staffing structure, with staff employed on a full-time and a fractional contract basis, which brings additional experience and flexibility to the staffing profile of the Agency. Regular resourcing meetings ensure that staff resourcing remains sufficient, and this has included a full review six months after the restructure in 2016.

QAA took advantage of the launch of our new Strategy, with its revised organisational values, to involve staff in changed ways of working within the changed operating environment, and is taking this forward through individual objectives in 2017-18.

QAA's review processes are based on peer review; details of those engaged as reviewers are provided in section 10.4. QAA has approximately 450 reviewers who are selected from a rich pool of talent and experience, both in the UK and internationally. In addition, QAA works with sector experts on an occasional or contract basis, drawing on expertise within the sector to support the Agency's wider work.¹¹²

QAA has well-established systems for the induction of new staff, staff development and performance management. An area on the updated intranet site is being developed to further improve the induction resources available to new staff. Performance management objectives are linked to the strategic aims of the Agency, and outcomes from the performance management process inform individual training and development needs. The performance management process extends to all staff undertaking QAA work, including QAA reviewers, whose performance is evaluated both by QAA staff and by providers with which they have worked.¹¹³

QAA has provided opportunities to staff to work with other higher education providers and organisations; this has supported staff development and enhanced the collective knowledge and experience of the Agency. Examples include QAA's close working with HESA and Jisc as part of the M5 Group, which has led specifically to a collaborative project focused on the use of data in quality assurance. A number of QAA staff have been seconded to the Department for Education to support the developments of the new regulatory landscape in England.

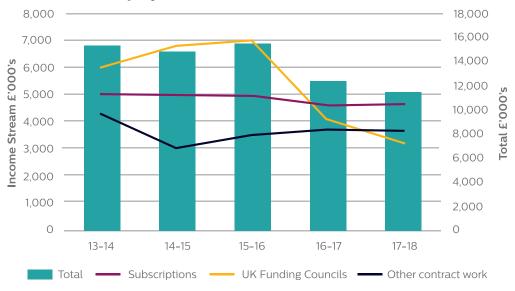
¹¹² Template reviewer contract; Appointment of reviewers: www.qaa.ac.uk/about-us/vacancies/appointment-of-reviewers

¹¹³ Training and development policy; Performance review process note

Financial resources

QAA's funding model continues to evolve along with the quality assessment landscape. There are three main sources of income: contract agreements with the four funding bodies in the UK, subscriptions from providers, and other contract work delivered both in the UK and internationally (described in section 4). The graph below shows the changing income profile for the five years from 2013–14 through to the projections for 2017–18.

Income profile 2013-14 to projected 2017-18



QAA's total income for 2016–17 was £12.2 million, and reserves amounted to £5.8 million. QAA's contract arrangements with the funding councils in England, Northern Ireland and Wales changed significantly in 2016 (see section 3). A robust financial planning reporting system ensures that QAA maintains sufficient oversight of this area.¹¹⁴ These systems are described in section 9.6 below.

Other agency resources

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

QAA has taken considerable steps to improve the effectiveness and efficiency by which it uses its resources. A 'lean review' has considered where QAA can make internal and operational improvements.¹¹⁵ QAA has worked with other higher education bodies to consider ways to share administrative costs. This resulted in the M5 Group developed between QAA, Jisc and HESA.

QAA has dedicated, independent information technology systems to support external quality assurance, in particular in managing review activity to ensure that milestones are achieved, and in facilitating the effective involvement of reviewers and their interaction with the review team. For example, an Agency-wide operational database (QMIS) is used to manage reviews, and the Review Extranet provides a central point by which reviewers, providers and QAA staff can undertake review activity. QAA assures itself that these systems are secure, sustainable and accessible to staff and reviewers as appropriate through conducting Privacy Impact Assessments.¹¹⁶

As noted below, QAA is accredited to ISO 27001 information security across the whole organisation, ensuring that information management practices are well established, regularly audited and follow international best practice.¹¹⁷

¹¹⁴ Financial regulations

¹¹⁵ Lean review update January 2017

¹¹⁶ Privacy Impact Assessment

¹¹⁷ ISO 27001: www.qaa.ac.uk/en/Newsroom/Pages/QAA-awarded-ISO-27001.aspx; Information security policy

In summary, QAA operates in a changing environment; however, the Agency believes that it meets this Standard, as it is well governed, well managed and has diverse income streams. It is confident that it has adequate resources to carry out its work, and the internal processes used to assure itself in this area are considered in section 9.6 below.

9.6 ESG Standard 3.6: Internal quality assurance and professional conduct

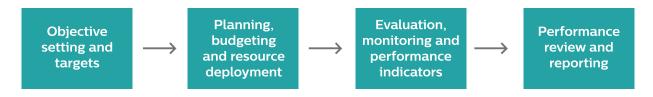
Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

QAA meets this Standard; it is accountable to its funders and other stakeholders through a comprehensive range of internal quality assurance mechanisms, as set out below.

Performance management and accountability

In May 2017, QAA launched its strategy, *Building on World-Class Quality*. QAA's annual operating plans and delivery programmes are framed around the strategy and strategic objectives. QAA measures delivery against its strategy at a number of levels, as follows.

- Annual plan and delivery plans detailed plans, including success criteria, are developed under objectives approved in the previous operating year: 2017-18 Annual Plan and Summary Annual Plan.¹¹⁸
- Assignment of responsibility strategic objectives and work strands are assigned to, and led by, directors and the senior management team.
- Termly monitoring of performance QAA undertakes detailed monitoring of operational performance against the annual plan three times per year (at the end of each academic term). This involves reporting key achievements against agreed performance indicators for each strategic aim and associated work strands, and highlighting any exceptions and risks to planned delivery.
- Oversight of termly monitoring termly monitoring reports are submitted to QAA's Executive and the Board, with a high-level summary of performance presented to the Board.¹²⁰
- End-of-year reporting to inform end-of-year and annual reporting, full-year delivery statements are submitted by directors and senior managers at the end of the operating year, on the strategic aims and work strands.¹²¹
- Annual reports an Annual Report and Consolidated Financial Statements (and other annual reports to funding bodies) are prepared and submitted to QAA's Executive, Honorary Treasurer, Audit Committee and, finally, the full Board.¹²²



The process of drafting this SAR caused QAA to reflect further on how it might refresh its performance management policy. As a result QAA simplified the process, is encouraging greater responsiveness (for example, by revising objectives in-year), a stronger focus on career development and discussions about how our organisational values are brought to life in an individual's role.

^{118 2017-18} Summary annual plan

¹¹⁹ KPI operational report to SMT 2017

¹²⁰ Monitoring and performance report term 3 2016-17

¹²¹ Annual reporting statement 2016-17: Aims 1 and 2

¹²² QAA annual report 2016 (as above)

Assurance of internal controls

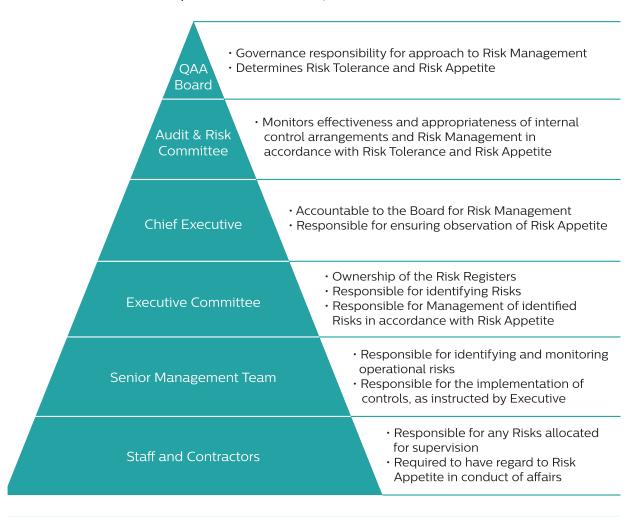
QAA is working with its internal auditors to develop a new risk and assurance map. An assurance map enables Board members and senior staff to demonstrate that they understand the risks associated with the organisation's business, and have appropriate process in place to manage and control them. It demonstrates that risks are managed appropriately and focuses third-party assurance in the right place. The new map uses a 'four lines of defence' model:

- 1st line of defence business management (operational risk managers)
- 2nd line of defence corporate oversight (risk owners and reviewers)
- 3rd line of defence independent assurance (for example, audit, legal, treasury advisers)
- 4th line of defence oversight by senior management, Board and committees.

The new risk and assurance map was presented to QAA's Audit and Risk Committee in November 2017 and is now being rolled out.

Risk management

QAA's approach to risk management is set out in its risk management policy, which is reviewed and updated every two years.¹²³ QAA distinguishes between strategic risks (those that threaten the achievement of QAA's strategic aims, as outlined in its strategy) and operational risks (those that relate primarily to the day-to-day conduct and delivery of QAA's business through people, processes, systems and resources). QAA records strategic risks in its strategic risk register, and operational risks against the activity to which they relate in the annual plan.¹²⁴ The diagram below outlines the allocation of risk-related roles and responsibilities within QAA.



¹²³ QAA's Approach to Risk Management

¹²⁴ Latest risk register

QAA's risk management processes were last reviewed by internal auditors in December 2015, and a report provided to its Audit and Risk Committee on the effectiveness of mitigating controls in managing strategic risk. The auditors concluded:

'Taking account of the issues identified, the Board can take substantial assurance that the controls upon which the organisation relies to manage the identified risk are suitably designed, consistently applied and operating effectively.'

Internal audit

QAA has an annual programme of internal audit. It commissions an external organisation to scrutinise key areas of the Agency's work. These annual audits result in a report that includes an action plan to address any areas of concern. QAA's Audit and Risk Committee agrees the annual internal audit programme, receives audit reports, and checks that action plans are implemented. Pecent examples of using internal audit to deliver improvements within the Agency include the following.

- Project governance and management audit (2016): internal auditors recommended that QAA should introduce a 'Lessons Learned Log' to capture issues, solutions and lessons from projects, for future improvement and development of QAA's processes. This was implemented by QAA and is now used as standard for project management, including for the management of QAA's quality assessment contracts.¹²⁶
- International activities audit (2016): internal auditors recommended that QAA should establish a flowchart of key processes to ensure that a robust framework for activity management was in place, linked to QAA's wider policies as appropriate. The International Team has recently developed activity process charts and, at the time of writing, is implementing a monitoring and reporting tool that will capture all international activities.

Equality

QAA is strongly committed to the principles of equality and sees this as part of its wider commitment to quality.¹²⁷ The Agency demonstrates this through its internal policies and working practices; for instance, equality and diversity training is a required part of staff induction. QAA also embeds it in its quality assurance work, as equality is an integral part of its approach to quality assurance and enhancement; for example, the Equality Challenge Unit contributed to the development of each section of Part B of the Quality Code. QAA's commitment to equality covers recruitment, opportunities for appropriate training and development, pay and benefits, access to facilities, discipline, capability and grievance procedures, and selection for redundancy.

In autumn 2017, QAA will pilot the use of Equality Impact Assessment (EIA) using ELIR 4 and will use this to develop guidance on the use of EIAs when developing and reviewing policy and procedures.

Staff development

All QAA staff have an annual performance review where both performance and professional development are assessed. In addition to setting performance objectives for the coming year, staff and managers identify any necessary training and development needs. QAA has an extensive programme of internal training events, including an Executive and senior development programme, a management training programme, and a range of skills and team-based activities. QAA contributed extensively to the development of, and is committed to using, the ENQA competencies framework and has encouraged staff and managers to use this as a tool for identifying suitable developmental activities. Through the process of preparing this SAR, we have recognised that we could do this more systematically. We support the proposed ENQA leadership development programme and hope to be early adopters.

¹²⁵ Audit and Risk Committee ToR

¹²⁶ Lessons learned log Office 365

¹²⁷ Equality policy

¹²⁸ Performance review process note (as above)

¹²⁹ Training and development policy (as above)

Information security and accessibility

QAA has been certified for compliance with ISO 27001, the international standard that sets out the requirements for an information security management system. QAA conducts regular information security audits.

The QAA website aims to meet the recommended standard of the World Wide Web Consortium for XHTML 1.0, CSS and Level AA of the accessibility guidelines. The website also aims to be accessible to assistive technologies and flexible for all users.¹³¹

Policies

QAA has a central intranet site where staff can access all of QAA's policies and procedures, including on facilities, human resources, information management, security and technology. Policies are reviewed on a regular basis and any significant changes, or the introduction of a new policy, are communicated to all relevant staff.

QAA is committed to working in an open and accountable manner, and publishes a range of corporate and review policies on its website.¹³² They help to assure the quality and transparency of QAA's work by providing clear reference points.

Following QAA's organisational restructure in summer 2016, some policies were identified as requiring significant revision, in particular QAA's performance management framework and the scheme of delegation. This work has begun and will continue during 2017-18.

Avoiding conflicts of interest

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

These mechanisms include:

- ethical conduct and anti-bribery policy¹³³
- whistleblowing policy¹³⁴
- Code of Best Practice for members of the QAA Board¹³⁵
- Registers of Board members' and directors' interests¹³⁶
- the inclusion of 'declaration of interests' as a standard item on relevant meeting and committee agendas.¹³⁷

QAA also operates an approval process for staff wishing to undertake work outside the Agency (paid or unpaid), to ensure that there is no conflict of interest or risk to QAA's reputation.¹³⁸

All QAA reviewer contracts include a code of practice, and copies of the ethical conduct and anti-bribery policy, to prevent conflicts of interest.¹³⁹ In order to increase robustness around such conflicts, QAA revised reviewers' contracts to ensure that they do not work for providers that they are reviewing for QAA within 12 months of the end of the review.¹⁴⁰

- 130 Information security policy (as above)
- 131 Web accessibility: www.qaa.ac.uk/accessibility
- 132 QAA policies: www.qaa.ac.uk/about-us/corporate-governance/policies
- 133 Ethical conduct and anti-bribery policy
- 134 Whistleblowing policy
- 135 Code of best practice (as above)
- 136 QAA board members (as above)
- 137 Declaration of interests on Board agendas (Item 2): www.qaa.ac.uk/en/AboutUs/Documents/Board-meeting-minutes-March-2017.pdf
- 138 Outside QAA work process
- 139 Template reviewer contract (Schedule 2) (as above)
- 140 Template reviewer contract (Schedule 2) (as above)

QAA designed its reviewer selection processes to identify and screen out potential conflicts of interest, and to achieve a balance in review teams in terms of gender and in relation to the reviewers' professional background.

QAA reviewer training covers equality, diversity and the avoidance of conflicts of interest, and QAA asks reviewers to declare any interests before assigning them to a review. When reviewers declare conflicts, the information is recorded on the reviewer allocation spreadsheet and a replacement is found. In the autumn 2017 reviewer allocation, it was discovered that, out of approximately 190 reviewers allocated, eight had a conflict of interest and had to be moved to another review or stood down.

Furthermore, higher education providers receive notice of their review team in advance, and are invited to identify any perceived conflicts of interest or other concerns with individual reviewers.

Subcontractors

Where subcontractors are involved in QAA activity, whether as reviewers or in any other capacity, their terms of reference or engagement are set out in a formal contractual agreement against which performance can be managed.¹⁴¹

Quality assurance of reviewers is also supported by internal procedures, including:

- internal review managers for managing reviewers
- regular moderation meetings for review outcomes
- formal sign-off and approval processes for publications
- a performance review process for reviewers.

Feedback and reflection mechanisms

QAA actively uses internal and external feedback to inform the continuous development and improvement of its work. Examples of this include the following.

- **Employee feedback**: internal feedback mechanisms include monthly briefings for all staff, led by the Chief Executive, where updates on key activities are provided and staff have the opportunity to raise questions. Lach Executive meeting is followed by a short debrief to the Senior Management Team and a note is produced to assist heads of function to provide feedback to their teams.
- **Team development and planning:** onsite and offsite planning days take place during the year for reflection, development and strategic planning. Information is cascaded from Executive to the Senior Management Team then on to operational teams.¹⁴³
- Cross-agency working groups: these are established as required to look at particular topics. Recent groups have focused on areas including the development of new services for QAA subscribers, QAA's responses to recent government consultations on higher education policy changes, data security and governance, and this self-evaluation report for QAA's 2018 ENQA review. Cross-agency working is a key part of QAA's operation, providing opportunities to share and develop skills and knowledge within the Agency.

(NB: The process of self-evaluation has given QAA an opportunity to consider further how it might make more use of the ENQA staff development framework.)

• Feedback on reviewer performance: following every QAA review, all reviewers, the review manager and the higher education provider are asked to respond to two questions relating to the individual reviewer's performance. The feedback involves a numerical scoring of performance, plus comments. At the end of each academic year,

¹⁴¹ Template reviewer contract (as above)

¹⁴² Staff briefing agenda Mar 17

¹⁴³ SMT away day agenda Nov 17

QAA aggregates the scores for each reviewer and the review manager responsible for a particular review method follows up any that are significantly high or low. This may involve a letter of appreciation, or an invitation to discuss how they can improve their performance. Reviewers with consistently high scores may be invited to participate in other quality assurance activities, such as appeal panels. Reviewers with issues identified in more than one review will not be used in further reviews, although they will be offered support to rectify any problems before this decision is taken. Reviewers are also asked to comment on the performance of relevant QAA staff and review managers, which feeds into their development and annual performance reviews. As part of the lean review, QAA undertook a review of its processes for the recruitment and selection, induction, training, performance management and communications of reviewers.

- Subscriber liaison programme: during 2016-17, QAA held around 160 meetings with individual subscribers. This programme provides critical feedback and information, and opportunities to understand what subscribers value about QAA, what the Agency could do differently, and how it can support their needs and challenges in the future. For example, QAA held two workshops in July 2017 in response to requests from the sector on how the European Standards and Guidelines can be mapped against both external expectations set out in the Quality Code and also providers' own internal quality assurance practices.¹⁴⁴
- Annual QAA subscriber conference: QAA's annual conference takes place over two days each spring, attended by several hundred QAA subscribers, stakeholders, UK and international speakers, and Agency staff. The format and content of the conferences is driven by feedback from previous events, advice from staff across the Agency, and insights from our meetings with subscribers during the year. For example, the 2017 conference had our largest ever attendance and included additional breakout sessions on policy topics requested by subscribers, including accelerated degrees and degree apprenticeships.¹⁴⁵
- Professional, statutory and regulatory bodies: QAA works with PSRBs to share information and experiences, and to streamline regulation. In partnership with the UK Inter-Professional Group, QAA hosts a PSRB Forum which meets two to three times each year to discuss higher education developments, and to gather feedback and intelligence from these bodies. QAA's PSRB Steering Group aligns the QAA review process with those of PSRBs to reduce duplication, which further benefits higher education providers.¹⁴⁶
- Feedback from QAA training and events: QAA runs a range of training and events throughout the year. All participants in QAA events and training are encouraged to provide feedback, so that the Agency can make improvements for the future. QAA has developed a standard set of feedback questions, so that the effectiveness of different events can be compared. Feedback is also used to develop new events, training or guidance where there is demand. For example, a joint event in summer 2016 with Universities UK on accelerated degrees has resulted in further policy development work between the two organisations.
- Focus groups and user testing: QAA also uses internal and external stakeholders for occasional focus groups or user testing. QAA's new website project in 2016, for example, used internal focus groups and external user testers widely to inform decision making about design and content development. QAA is also using feedback from the first users of its new online training course, Concepts of Quality, to make further refinements.

¹⁴⁴ ESG workshop aims and programme

¹⁴⁵ QAA Annual Conference 2017: www.qaa.ac.uk/newsroom/events/event-resources/qaa-annual-conference-2017

¹⁴⁶ PSRB Forums (as above)

¹⁴⁷ Template feedback from events

10 Compliance with European Standards and Guidelines (Part 2)

NB: In the light of the number of review methods that are within scope for this review, and in the interests of maintaining the SAR at a reasonable length, QAA has provided a table at **Annex 2** that sets out the key principles in part 2 of the ESG and maps adherence from each relevant review method against them.

10.1 ESG Standard 2.1: Consideration of internal quality assurance

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

QAA meets this Standard through the Quality Code (see also section 6), which sets out the formal expectations that all UK higher education providers reviewed by QAA are required to meet. 148 It is the nationally agreed, definitive point of reference for all those who deliver or support UK higher education programmes. By supporting institutional responsibility for quality assurance, it demonstrates that QAA is meeting the standards required for an external quality assurance body.

Part A sets out what is expected of UK degree-awarding bodies in setting and maintaining the academic standards of the qualifications and credit that they award. It identifies the relevant UK and European frameworks, statements and reference points, and explains how these relate to each other and provide a context for the quality assurance of standards.

Part B is concerned with the quality of the learning opportunities that are in place to support students in higher education and enable them to get the most out of their higher education experience.

Part C focuses on the quality of information that higher education providers make available about their provision for different audiences in different formats.

The table in Annex 3 shows the relationship between the ESG and the Quality Code, and demonstrates that the external quality assurance undertaken by QAA takes full account of the standards and guidelines for internal quality assurance, as set out in Part 1 of the ESG.

10.2 ESG Standard 2.2: Designing methodologies fit for purpose

External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

QAA is meeting this Standard. Common principles are followed for the development of all QAA's review methods (see section 6). A key feature of QAA's approach is to consult with stakeholders in the design of its review methods. This helps to ensues that the method is fit for purpose and demonstrates that QAA is meeting this Standard. It is important to note, therefore, that there are differences in how the different methods are operationalised. QAA also takes into account new and emerging approaches to quality assurance, such as those that are risk-based or outcomes-focused, or the use of qualitative and quantitative data.

One example is the recent development of the Quality Review Visit as a method to respond to the HEFCE tender. The details of the approach were consulted on across the higher education sector and the final handbook produced through consideration of this input.¹⁴⁹

In the consultation, QAA also received feedback through webinars that it ran as part of the consultation process. After publishing the handbook, QAA issued supplementary guidance and briefings for providers.

A second example is the development of the Quality Enhancement Review method in Wales, which was carried out in conjunction with providers and sector networks as part of the development phase to ensure that the method meets the needs of Wales and its higher education sector.¹⁵⁰ This iterative process of enquiring, listening and testing is a further example of partnership working.

In addition, the draft handbook was subject to QAA's usual open consultation before being finalised and published. QAA further meets the needs of providers in Wales through its adherence to the requirements of the Welsh Language Measure 2011, and the principles of working bilingually in Wales.

The recently developed TNE review method further demonstrates how QAA ensures that its methodologies are fit for purpose. While the common principles described above were maintained, an increased emphasis was placed on developing the country-based and partnership-based nature of the review method. This was designed both to support QAA in its review activity, and to deal more efficiently with the scale and geographical spread of UK TNE.

In addition, reviewers and institutions that have undergone review are asked to evaluate each review in which they participate, and to provide feedback on whether or not it was appropriately implemented and whether the handbook for the method was useful (see section 9.6).

10.3 ESG Standard 2.3: Implementing processes

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include

- a self-assessment or equivalent;
- an external assessment normally including a site visit;
- a report resulting from the external assessment;
- a consistent follow-up.

QAA meets this Standard and the four-stage model is one of its common principles.

All of QAA's review methodologies follow a model that incorporates the common principles described at the start of section 6. These include the following.

- Review processes are pre-defined in handbooks available through the QAA website.
 Most methods are subject to public consultation before being finalised.
- Self-evaluation received from the provider going through review (where not fully involved in the production of the self-evaluation, students have the option to provide an additional, independent written or audio-visual submission).
- A desk-based analysis undertaken by the members of the review team and a preparatory meeting by the team prior to the review visit.
- A site visit.
- Published report and action plan (the action plan may be published with the report or separately by the provider on its website).
- Follow-up activity where necessary.

QAA takes steps to ensure the reliability of its reviews by:

- only recruiting reviewers with considerable experience of higher education, whether they are academics, students, or professional support staff. It trains reviewers so that they can work to professional standards.
- ensuring that review teams make judgements according to decision-making frameworks set out in the review handbooks¹⁵¹ through testing and challenge by the QAA review manager. All review team decisions are made by consensus; teams do not vote for outcomes and there are no 'majority' decisions.
- training review teams to explore and evaluate evidence put forward by the provider under review and to triangulate the evidence for significant findings and judgements. Review reports are evidence-based, and providers receive a draft report that includes references to the review's evidence base to document and secure the findings of the review team.
- sending draft reports to both the provider and the student representative for their comments on factual accuracy.
- checking all review outcomes before they are confirmed. This usually involves a
 moderation process or a check by QAA staff trained in the method and independent
 from the review. These checks ensure that the wording of the outcomes is clear and
 that reviewers have appropriately applied the judgement criteria.
- in some methods, also moderating decisions relating to how the method is applied. For instance, in the annual monitoring of alternative providers, decisions relating to whether providers should have a visit, extended visit, partial review or full review are subject to moderation. Such decisions are also aligned to decision-making frameworks defining what would 'trigger' each type of activity. This demonstrates the flexibility that QAA must demonstrate in order to work effectively across a diverse sector and the four devolved nations of the UK.
- evaluating all reviews to check that they are fit for purpose and conducted according to the review method.

Since QAA's last ENQA review in 2013, several methodological improvements have been made. For example, QAA has enhanced student engagement in all review methods. Where not fully involved in the self-evaluation alongside the provider, we invite students to make a submission in writing or through audio/visual recordings, to accompany and comment on the provider's self-evaluation document. The role of facilitator is also now mirrored by a lead student representative in most methods. These initiatives ensure that students are given an equal platform to that of the provider in the review process: students' voices are heard clearly throughout the review and there are enhanced opportunities for students to be involved in external quality assurance processes. To improve transparency in the process, lead student representatives can observe student meetings and institutional facilitators can observe staff meetings during the review visits. This has promoted greater understanding on the part of the provider of the lines of enquiry being pursued by review teams.

In Scotland, rather than producing a separate student written submission, students are directly involved in the development of the institution's self-evaluation document and routinely participate in the annual discussion between QAA and the institution.

QAA's new review method in Wales, QER, has continued QAA's long history of furthering the engagement of students in quality assurance and the method itself. It considers how providers respond to the full diversity of their students and their needs and how the provider engages with students beyond the student representatives. For the first time, it allows providers to request an international student reviewer for a QAA review. It also allows the lead student representative to observe all of the review meetings, not just those involving students, but only with the consent of the provider.

Enhancement continues to be central to QAA's review methodologies. In Scotland, there is a searchable database linked to the work on Enhancement Themes.¹⁵² QAA now also publishes searchable databases of features of good practice, affirmations and the recommendations highlighted in reports.

QAA's published reports clearly state the outcomes of each review (judgements) and highlight features of good practice, affirm any weaknesses that the provider is taking action on, and make recommendations. Recommendations include a timeframe for response indicating the urgency attached to them.

Most higher education providers are required to produce an action plan or follow-up report setting out their planned action against each of the recommendations, and some review methods also require proposals as to how the institution will build on the features of good practice. The action plan may be published or monitored by QAA; the level and frequency of monitoring depends on the outcome of the review.

The majority of reviews are 'signed off' on publication of the action plan (if the outcome was positive) or at a point during the monitoring of the action plan when there is evidence that the matters raised by the review team have been satisfactorily dealt with following an evidence-based, formal follow-up process, often involving a re-visit.

The purpose of QAA's external review processes is to provide public assurance about the standards of higher education awards and the quality of the learning opportunities that enable students to achieve those awards. Processes should not be unduly onerous but should be sufficient to secure the purpose. We believe that our review processes are operated with transparency and are methodologically robust, such that they reliably meet this Standard.

QAA has endeavoured to ensure that its review processes are built on the principles enshrined in the ESG. We believe that the evidence above demonstrates that it has strong safeguards in place to ensure the effective implementation of review processes.

10.4 ESG Standard 2.4: Peer-review experts

External quality assurance should be carried out by groups of external experts that include (a) student member(s).

QAA fully supports the principles of peer review and believes that it meets this Standard through the design of all its review methods.

Reviewers ('experts') are nominated by providers and selected by QAA, according to specific criteria, through a paper-based exercise. Student reviewers are nominated by their provider and may also be nominated by their students' union. Reviewers can also apply directly to QAA to become reviewers. QAA screens all applications to ensure that reviewers meet the criteria specified in review methods. All review teams are composed to ensure a balance of experience, gender and institutional type.

All selected reviewers must complete a training programme that, as far as possible, takes them through a simulated review that mirrors all the activities undertaken in an actual review.¹⁵⁴ The review training culminates in an assessment of a written piece of work and their performance in a mock review meeting. QAA only allocates reviewers to review teams if they have successfully completed training. Students are full members of review teams and QAA expects them to complete the same training. QAA's approach to equality (see compliance with Standard 3.8) and the selection criteria together ensure that there is no discrimination.

Every review ends in an evaluation phase where reviewers, QAA staff and the provider can provide feedback on the review process and the professional conduct of those involved. This informs a performance review of the reviewers, which enables QAA to provide developmental support for weaker reviewers and address underperformance. It also enables QAA to identify excellent reviewers who can share their practice with

¹⁵² Enhancement Themes database: <u>www.enhancementthemes.ac.uk/resources</u>

¹⁵³ QRV reviewer role specification

¹⁵⁴ HER reviewer training programme

others. These evaluations also help to confirm that the review method is fit for purpose and meets its specified aims. QAA also convenes focus groups, normally on an annual basis, for provider facilitators, student representatives and reviewers to feed back on their experience of the process and method.

QAA has used international reviewers on its review teams in Scotland in Enhancement-led Institutional Reviews (ELIR) since 2008 (although it has made this an option for institutions in ELIR 4 to enable the process to be tailored to the mission and strategic direction of individual institutions), and they are optional for reviews or regulated providers in Wales from 2017. International reviewers provide assurance that the quality systems in place in Scottish institutions are consistent with expectations in a range of other countries. In addition, they provide developmental insights in areas of academic practice, drawing on the role of similar practice in their own professional context. In many cases, QAA uses the expertise and networks of international reviewers to support its wider enhancement activities in Scotland.

Overall, the UK higher education sector is highly international; many QAA reviewers have direct experience of working internationally or have been involved with collaborative provision overseas. Therefore, the distinction between 'home' and 'international' reviewers is increasingly blurred. QAA focuses on creating review teams that meet the needs and expectations of the review method and the institution under review.

QAA believes that it meets this Standard, as it assesses prospective reviewers, including student reviewers, against specific criteria before accepting them into the pool and inviting them for training. QAA assesses reviewers again on completion of their training to ensure that they are sufficiently expert and have the necessary skills. If these safeguards fail, QAA uses performance reviews to identify any weaknesses in its expert pool and remedy them. QAA provides routine Continuing Professional Development for reviewers through its Annual Reviewers' Conference so that they can remain experts.

QAA recognises that, for two methods (TNE and GoSC), student reviewers may not be included in the panel. In the case of the latter, on reading this draft SAR, GoSC has suggested that it will use student reviewers in the future and is discussing this further with QAA. TNE reviews have small review panels and a student may or may not be involved. This is not ideal but, given the contract and its funding, QAA provides an equal opportunity for students to be recruited to panels and believes that the work that it carries out with students across the entirety of its work mitigates against these small anomalies.

10.5 ESG Standard 2.5: Criteria for outcomes

Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.

QAA meets this Standard by ensuring that judgements are made with reference to explicit and published criteria.

QAA review methodologies are developed in consultation with the higher education sector, as described under Standard 2.2. Review method handbooks are available on the QAA website and contain information on the review process, as well as on the judgements and on the expectations that must be fulfilled in order to achieve positive judgements.¹⁵⁵

The methodologies set out in the handbooks, including the criteria for coming to judgements, are reinforced in several ways. The previous section (Standard 2.4) describes how they are covered in peer reviewer training. Providers under review are invited to attend briefings or preparatory workshops, some of which are delivered virtually.¹⁵⁶

The expectations against which judgements are made are those set out in the Quality Code and other reference points, and are mirrored in the handbook for the relevant method, developed in partnership with the higher education sector. A QAA officer is involved throughout the review process, and works with the review team on the final day of the review to ensure that judgements and outcomes of the review are evidence-based and sound. Judgements and outcomes are subject to scrutiny through an internal moderation process, in order to ensure consistency of judgements, except where low volume makes this unviable (for example, where timescales mean that there are no comparable reports being produced at the same time). The report is then drafted or edited by the QAA officer. All such QAA officers have attended reviewer training and observed/shadowed a more experienced officer, before carrying out their first review.

10.6 ESG Standard 2.6: Reporting

Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

QAA believes that it meets this Standard and, since the ENQA review in 2013, has continued its efforts to develop a clearer style of reporting. The public report for each QAA review is as short as is feasible and written in plain English. QAA trains staff and reviewers to write clearly. It produces detailed guides on writing and house style for all methods. ¹⁵⁷ QAA's Marketing and Production Team is responsible for the proofing and publication of reports.

In those cases where a QAA officer drafts the report, they do so based on a set of notes provided by each member of the review team, based on the sections of the report for which that team member was responsible. However, the judgements are always reached by the review team as a whole and not by the QAA officer who writes the report.

QAA also issues guidance for higher education providers engaging in reviews, along with online briefings for reviews. In addition, QAA publishes an online glossary of commonly used quality assurance and enhancement terms. Reports for Welsh higher education providers, as well as other documentation and correspondence relating directly to our work in Wales, are translated into Welsh. QAA also maintains the capacity to carry out a review in Welsh should this be requested by the provider.

QAA is working with the Welsh Language Commissioner to meet the Welsh Language Standards. The principle behind the Standards is that the Welsh language must not be treated less favourably than English when we are dealing with organisations, individuals and activities in Wales or services for those in Wales. As a result relevant documents, reports and web pages are available in both languages. Review teams in Wales are likely always to include a Welsh speaker and parts of a review may be in Welsh with simultaneous translation provided as needed.



QAA publishes the majority of its review reports on its own website (the review reports for GOsC, for example, are published on the GOsC website). The majority of review reports include judgements (the format of which depends on the methodology used), features of good practice and recommendations for improvement. Following a recommendation from the previously named Student Advisory Board in 2014, the provider pages on the QAA website were redeveloped to enable a visually simpler and more easily accessible representation of review outcomes. ¹⁵⁹ Key findings are always included at the start of the report so that they can be located easily. ¹⁶⁰

¹⁵⁷ QAA House Style Guide: www.qaa.ac.uk/en/AboutUs/Documents/QAA-House-Style.pdf; QRV report writing guidance

¹⁵⁸ Glossary: www.qaa.ac.uk/about-us/glossary

¹⁵⁹ SAB minutes Feb 14

¹⁶⁰ Reviews and reports (as above)

With ELIR and QER methods, we produce a short 'outcome' report for a general audience to make review findings more accessible to, for example, students or the wider public. A longer and more detailed 'technical' report is also produced, which is designed for the provider and quality professionals.¹⁶¹

QAA uses multimedia, particularly social media, to reach the wider public and has an established and well-accessed presence on social media channels, with postings on Twitter and films on YouTube and LinkedIn. QAA continues to build its social media portfolio to engage audiences using Storify. Furthermore, QAA uses films on its website and YouTube channel as additional ways to reach its different audiences. 162

QAA continues to build relationships with, and link to and from, high-traffic websites and media outlets used by higher education applicants, current students and other public audiences (such as the UK Unistats and UCAS websites).

10.7 ESG Standard 2.7: Complaints and appeals

Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

QAA meets this Standard by designing and monitoring its complaints and appeals processes, and operating these rigorously.

QAA has confidence in its review processes but acknowledges that there are times when a higher education provider wishes to challenge a decision/outcome. QAA distinguishes between complaints and appeals. A complaint is an expression of dissatisfaction with services provided by QAA or actions it has taken. An appeal is a challenge to a specific decision, in specific circumstances.

QAA has robust appeals and complaints processes in place and publishes clear procedures for responding to complaints from higher education providers and for handling appeals against specific decisions.¹⁶³ The processes for investigating complaints and for the handling of appeals, tailored to each review method, are publicly available on the QAA website.

In terms of appeals, since its last ENQA review in 2013, QAA has implemented a revised version of its Consolidated Appeal Procedure, under which most appeal submissions are screened by one of a small panel of experienced and specially trained independent reviewers to ensure consistency. Independent reviewers can refer all of an appeal, or parts of an appeal where this is appropriate to avoid the consideration by appeal panels of superfluous material. Appeal panels are supported by an expert adviser to ensure the consistent application of the relevant review methodology. The range of options available to appeal panels in reaching their decision on an appeal has also been refined in order to promote the consistency of outcomes across panels. The overall decision for the appropriateness of action required following the upholding of an appeal is made by the responsible director. All QAA appeal reviewers receive training and refresher training to ensure that they are confident in their roles and with their responsibilities. Appeal outcomes, together with any other relevant comments from appeal reviewers, are fed back to the director with responsibility for the review method under appeal to inform improvements and refinements to the method. 164

¹⁶¹ Reviews and reports (as above)

¹⁶² QAA films: www.youtube.com/user/QAAtube

¹⁶³ Complaints and appeals:

www.qaa.ac.uk/about-us/complaints-about-qaa-and-appeals-against-decisions

¹⁶⁴ QRV appeal panel training agenda

Information on the numbers of appeals over the last five years can be found in the tables below.

Year of review	Providers e to appeal	ligible	Eligible pro that did app		Eligible pro that did not	
	Publicly funded	Privately funded	Publicly funded	Privately funded	Publicly funded	Privately funded
2012-13	7	18	3	5	4	13
2013-14	15	21	4	5	11	16
2014-15	31	11	8	5	23	6
2015-16	22	15	1	5	16	5
2016-17	15	11	3	3	12	6

Year of review	Appeal	pending		
	Publicly funded	Privately funded	% of publicly funded providers that were eligible to appeal vs those that actually appealed	% of privately funded providers that were eligible to appeal vs those that actually appealed
2012-13			42.86	27.78
2013-14			26.67	23.81
2014-15			25.81	45.45
2015-16			4.54	33.33
2016-17	0	2	20	27.27

QAA maintains similar statistics for complaints. For example, in 2015–16 QAA received 7 complaints. All were subject to independent scrutiny by Governance and reported to the Board. None were found to have the basis to be upheld.

11 Information and opinions of stakeholders

QAA's primary stakeholders are the higher education providers that we work with across the UK and internationally. Our liaison visits to UK universities provide regular feedback and intelligence on their views and expectations of QAA. This information is captured in a customer relationship management system, where it is analysed and used to inform decision making and planning of services, events and content for the Quality Enhancement Network and our Annual Conference. We also work closely with all the representative bodies, which ensures that we are aware of current issues and expectations being raised by their members.

In order to get a detailed understanding of how QAA is perceived, we commissioned a report based on interviews and a focus group with vice-chancellors and senior leaders in May 2017. This report will help us to shape our future services and understand perceptions of QAA as the quality landscape undergoes significant change.¹⁶⁵

In June 2017 we also carried out an anonymous survey of all higher education providers in the UK.¹⁶⁶ The results reflected the views of senior management and above, and those working in quality from 12 per cent of all universities, colleges and alternative providers in the UK.

- All of the respondents viewed their institution's relationship with QAA as very important (70 per cent) or important (30 per cent). The main reasons given were in relation to QAA's authoritative external role, enabling providers to improve and challenge their own practice and regulatory role. QAA's frameworks and guidance are trusted, and the co-regulation approach is valued.
- The question 'Would you recommend QAA's services to a colleague or another provider?' was used to ascertain QAA's 'Net Promoter Score', which is widely used to measure customer experience and the loyalty of customer relationships. A score above zero is positive, with 50+ being excellent. QAA's score from this survey was +36. There were some concerns from alternative providers that QAA's current offering is not always relevant to them. This will be addressed in the coming months with a more tailored service for alternative providers. Other feedback included the need for documentation to be easier to understand. The QAA website is also currently being rebuilt, taking into account the results of user testing, which will make information and publications more accessible. Respondents found QAA to be an effective and efficient organisation with a wide range of services, well-informed staff and excellent supporting resources.
- Over 80 per cent of respondents believed that QAA has demonstrated that it is fit for purpose to support and benefit UK higher education internationally, either completely or to a great extent. The respondents expressed support for the Quality Code, QAA staff and QAA's longstanding reputation and expertise.

This survey will now be an annual activity as it has provided valuable insight into perceptions of QAA and UK higher education, and will provide a comparative analysis of perceptions year on year. The next provider survey is planned for June 2018.

We involve students in all areas of our work, and we work closely with their representative bodies (NUS) and consortia of stakeholders that further the engagement of students in higher education: TSEP, sparqs, and Wise Wales. We consult more formally with students through our Student Advisory Committee and the Quality Matters Conferences. QAA also ran a number of student focus groups for the DfE to inform the consultation on the TEF.

¹⁶⁵ Shaping the future role of QAA summary

¹⁶⁶ Provider survey 2017 report

¹⁶⁷ Student Advisory Committee (as above); Quality Matters programme Oct 2017

Our Board and staff are also key stakeholders in our work and were actively involved in the development of our new Strategy and Action Plans. Board members take active roles at our Annual Conference as speakers, chairs of breakout sessions and contributors, which enables them to engage with our core stakeholder groups. They also contribute as critical friends in the development of key QAA publications and strategies. QAA staff actively engage in events run by representative sector bodies and other related organisations, both in the UK and internationally.

12 Recommendations and main findings from previous review(s) and agency's resulting follow-up

The following table summarises the main findings and recommendations of the ENQA review panel and Board, following QAA's 2013 review. It also provides details of actions taken by QAA in response. The ENQA 2013 review report has permeated all levels of QAA. It provided a welcome opportunity to reflect on the Agency's work, and to involve the Board and staff in its ongoing development. QAA provided a follow-up report to ENQA in 2015.¹⁶⁸

2013 ENOA recommendation	2015 follow-iin report	Firther progress
ESG 2.2 (development of	England and Northern Ireland	England and Northern Ireland
external quality assurance processes)	QAA's risk-based approach to quality assurance	• There has been significant change, with the
Panel recommendation:	which ran between 2013-16 as the review method	assessment in England and Northern Ireland.
the 'risk-based' analysis	for publicly funded universities and further	The main responsibility for assessing risk lies with
should be developed further	education colleges in England and Northern	HEFCE and is outside of the scope of this review.
bearing in mind the need	Ireland.	• The model has been designed to be proportionate.
to ensure conceptual clarity	 Across the three years of this method, 	risk-based and grounded in the context of each
and procedural Illness for	QAA conducted 227 reviews consisting of 58	individual provider and its students.
	universities, 168 colleges and one private college.	• It is intended to target regulatory scrutiny and
Board request: the risk-	 The risk-based element of this method was 	activity on those issues and providers that represent
based approach Will be a	manifest in two main ways: in the interval	greater risk to the student academic experience or
major leature of the new	between reviews and in the intensity (as	to the reputation of the sector as a whole.
The follow-up report should	measured by the duration) of review visits.	· Providers new to the system, or about whom there
provide explanations	 Providers with a strong track record in managing 	are, or have been, concerns, can be subject to
and clarifications on the	quality and standards were reviewed less	enhanced scrutiny.
implementation of this approach.	frequently and less intensively than providers without such a strong record.	• It also provides for rapid, coherent and targeted
	 The interval between reviews was six years for 	myestigation and intervention across the full range of regulatory concerns.
	providers who had had two or more successful	· Since 1 August 2016. OAA has delivered significant
	reviews by QAA and whose last review was	elements of the model under contract to HEFCE.
	אתררפיטותו.	
	 Providers who had not had two or more 	
	successful reviews by QAA and/or whose last	
	review by QAA was unsuccessful were reviewed four years after their last engagement with QAA	
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- In Wales, QAA operated a different risk-based approach, Higher Education Review: Wales.
- Risk was assessed on the provider's track record as indicated by the outcome of the previous review.
- This meant that where an institution has a review that does not indicate any significant weaknesses the interval between reviews remained at six years.
- In cases where the outcome of the review indicated significant weaknesses, the interval between reviews was either four years or two years.

Scotland

- In Scotland, the review method is Enhancement-led Institutional Review.
- This cannot strictly be described as being primarily risk-based, but it is responsive to the strategic context of the institution, including the trends in the student population and the consequences of those for the quality arrangements that are in place.
- All institutions are reviewed on the same cycle at the same interval, but the themes pursued, and the nature of follow-up, will depend on a number of factors, including the complexity of the institution's provision and the extent to which it demonstrates effective self-evaluative practices.

Wales

- In May 2017, Universities Wales announced that it had commissioned QAA to be the independent external quality reviewer on behalf of all universities in Wales.
- QAA consulted with providers and other stakeholders on the design of the next method in Wales, and published Quality Enhancement Review.
 - The new method is being piloted in the 2017-18 academic year.
- HEFCW's Quality Assessment Framework has a risk-based approach. Providers' annual reports to HEFCW can trigger early full or partial QAA review activity. In addition, providers that receive judgements of 'meets requirements with conditions', or 'does not meet' are scheduled for rereview within four or two years respectively (instead of six years for 'meets requirements' judgements).

Scotland

QAA is delivering the 4th cycle of Enhancement-led Institutional Review in Scotland from 2017-18.

The approach in relation to risk remains as reported in the 2015 follow-up report.

ESG 2.4 (processes fit for purpose)

Board request: in its followup report, QAA is invited to describe and provide evidence on how the guideline 'ensuring that the review procedures used are sufficient to provide adequate evidence to support the findings and conclusions reached' is met.

England, Northern Ireland and Wales

- QAA's principal review methods for approximately 700 universities, colleges and private providers are fundamentally evidence-based review methods, the judgements of which flow explicitly from information about the provision under review.
- The emphasis on evidence commences from the very start of the review process, in the detailed guidance given to providers and their students about the range and type of information they are expected to provide to review teams.
- The review method then provides review teams with two opportunities to request and receive further evidence about the provider before the review visit commences. The review visit provides more opportunities to gather written evidence, as well as to document evidence from meetings with students, staff and other stakeholders.
- Ensuring that the findings of Higher Education Review are grounded in sufficient evidence is a key part both of training for reviewers and of the role of QAA Review Managers who manage the review process.
- Reviewers must cite evidence in support of any judgement, recommendation, example of good practice or other evaluative statement, and these citations are included in the draft report sent to the provider so that the provider may understand precisely what evidence the outcomes derive from.
 - To aid this process, QAA uses standard schema for the citation of evidence: reviewers use numerical references linked to a full list of evidence included at the end of the draft report.

The same principles and approaches to evidence have been embedded in subsequent review methods.

	Scotland	
	 The Enhancement-led Institutional Review method is an evidence-based method combining the scrutiny of documentation; institutional visits, including meetings with students and staff; published reports; follow-on reports and events, together with thematic analyses of outcomes to maximise learning and the enhancement of policy and practice. External and QAA's own evaluation of the overall enhancement-led approach has found that QAA's work has had considerable impact on practice in the sector. 	
ESG 2.7 (periodic reviews)	The Quality Code was completed in October	During 2016-17, QAA undertook a review of the
panel comment: for all institutions, the balance of risk would need to be carefully calibrated against the comprehensive Expectations contained in the Quality Code. The transition to the Quality Code will be completed in 2013-14 and the QAA website redeveloped, to aid institutions and the public in understanding the Quality Code's role and relevance. Board request: the followup report should include progress on this statement, as well as evidence on how the papel recommendation is	Expectations in the Quality Code and in Higher Education Review the following August. Expectations were set out in Annex 2 of the Higher Education Review Handbook, demonstrating how they aligned with the judgements on academic standards, quality of learning opportunities and information. Following completion of the Quality Code, QAA has focused on making it as accessible as possible to reviewers, providers and other stakeholders. This work has included: • a series of case studies for providers on how the Quality Code is used in practice, set in the context of the Quality Code's indicators of sound practice and other content	policy and regulatory higher education landscape. This included events and stakeholder discussions to gather views on how the Quality Code should develop to meet future needs. Areas identified for development include: • rationalising the content of the Quality Code • updating its terminology • presenting it in a way that is less process-driven • making it more accessible to a variety of audiences • reflecting the new role that governance plays in quality • continuing to support enhancement and improvement.
implemented.		

	• a number of workshops and engagement with members of other sector organisations	QAA is using this feedback to inform the advice it offers the UK Standing Committee for Quality
	 making the Quality Code directly accessible through a web-based application called 'Build Your Own Quality Code', through which 	<u>Assessment</u> (which has responsibility for overseeing the <u>baseline requirements</u> for quality assessment) and the future development of the Quality Code
	users can extract content by theme, or extract, for example, just the Expectations, as well as being able to download individual chapters	
	 an overall redesign of the Quality Code web pages, improving accessibility 	
	 publication of <u>The Quality Code</u>: A <u>Brief Guide</u> for lay audiences 	
	• toolkits for specific audiences, for example <u>colleges</u> that do not have degree awarding powers.	
ESG 3.5 (independence)	 QAA has secured contracts with HEFCE for each year since the ENQA review 	Circumstances have changed significantly since the last review. The elements of QA not operated
should be taken to safeguard	 the Quality Assessment Review undertaken 	by HEFCE itself were subject to a competitive
the element of current HEFCE	by the funding councils of England, Wales and	procurement exercise under OJEU regulations.
funding and to protect the	Northern Ireland between 2014-16 challenged	Following the 2014-16 Quality Assessment Review
QAA in any changes following	sources, with the possibility that the quality	quality assessment in England and Northern Ireland,
the implementation of	assessment contract could be put out to	QAA is contracted to deliver significant elements of that framework including: Outlier Devices Vicits:
model in England, whereby	• six contracts were subsequently put out to	investigating concerns about unsatisfactory quality;
funding for teaching will in future reach institutions	tender, of which QAA secured four (and is a	and a UK-wide contract for transnational education reviews and international strategic engagement.
wholly via student fees (rather	partner in a min).	
than a combination of tuition fees and grant via HEFCE).		
Board request: the follow-		
up report should include an analysis on this.		

-	
	QAA also has a contract with the English funding body to deliver key components of the assessment process for Year 2 of the new Teaching Excellence Framework.
•	The Higher Education and Research Act 2017 will establish a new English regulatory body, the Office for Students, and HEFCE will cease to operate in 2018.
•	The Act makes provision for designation of an independent quality body - that body will have the legal right to charge fees.
•	QAA has publicly stated that it intends to become the designated quality body and will put forward the strongest case to support that, in the interests of UK higher education.
<u>. u</u>	 The English Government consulted on the designated quality body in autumn 2017. Wales:
•	In May 2017, Universities Wales announced that it had commissioned QAA to be the independent external quality review body on behalf of all universities in Wales.
•	The Quality Enhancement Review (QER) meets this specification and will be piloted in 2017-18.

13 SWOT analysis

QAA held two sessions that were open to all staff in order to get an initial Agency-wide perspective on what its strengths, weaknesses, opportunities and threats are. Staff engaged in lively discussion at these events, and they resulted in an initial SWOT that was used for discussion by the Board, Executive and stakeholders to produce the final SWOT below.

Strengths

- UK-wide organisation representing all types of HE provider
- 20 years' experience in successfully delivering quality assurance
- Strong reputation in the UK and internationally for safeguarding quality and standards
- Established strategic partnerships and collaborations with UK and international sector bodies/agencies
- Leader in quality enhancement in UK HE, particularly regarding student engagement
- Effective stewardship of key UK reference points and frameworks for QA
- Sought after as a source of advice and guidance within the UK and internationally
- · Flexible, adaptable and resilient
- Organisational change has streamlined operations and brought in new staff to strengthen expertise

Weaknesses

- Transition to new structural arrangements led to some loss of expertise
- Reduced role for QAA in quality assurance of publicly funded HE providers in England and Northern Ireland
- Instability of income streams

Opportunities

- Design and implementation of a new quality review system in England, subject to appointment as designated quality body
- Promotion of QAA expertise through increased information, advice and guidance to the sector
- Further efficiencies and benefits through new and established partnerships
- Increased international services and support for quality assurance in higher education
- Greater engagement with all types of UK HE provider
- Harnessing big data and learner analytics to focus QA on student outcomes and success
- Change in funding sources encouraging innovation, creativity and enterprise

Threats

- Unforeseen changes in government policy and legislation
- Increased divergence through devolution leads to loss of UK cohesion
- Increased competition from other sector agencies
- Reduction in funding streams leads to inability to deliver a professional service
- Limited understanding of risk-based approach generates sense that QA is inadequate

Reflecting on the SWOT, directors noted that the strengths reflected the values in QAA's new strategy: *expertise* in the depth of experience combined with new staff bringing fresh experience of the HE sectors in the UK; *innovation* in QAA's approaches to quality improvement and as stimulated by the challenges of responding to external change; *collaboration* with strategic partners in the UK and internationally; accountability in the stewardship of the Quality Code; and *integrity* in the respect for our work and for the impartial advice and guidance QAA offers. Senior staff and Board members noted the clear correlation between the opportunities and the aims of the new Strategic Plan (as well as the work planned in 2017–18).

14 Current challenges and areas for future development

QAA faces a range of challenges and opportunities over the course of the current strategic planning period, 2017–20, and in the period thereafter. We operate in a time of great change and if quality assurance remains static it will not serve students well. Our review methods will need to be more responsive to change while maintaining comparability of outcomes as systems move away from rigid cycles towards risk-informed or rolling programmes of review, together with innovative approaches to enhancement that enable high quality to be demonstrated more effectively.

Some of these challenges are shared by quality assurance agencies throughout Europe and beyond, and there is a risk that quality assurance agencies are left behind. External quality assurance must keep pace with a fast-changing higher education environment characterised by a broadening array of delivery modes, a growing diversity in the types of providers, and rising student expectations.

In the UK context, diverging national interests among the four countries make QAA's role as a UK-wide body increasingly important, both as a key partner in co-regulation and in maintaining a UK-wide overview of the quality of higher education.

In a system with over 600 providers, approaches that assume or expect that all providers are the same will not work. The establishment of baselines is important in ensuring that only quality providers enter the sector. Beyond that, quality bodies need to operate in an intelligent manner that recognises the individual mission and purpose of each provider.

While external quality assurance has never been solely focused on process, it must increasingly focus on student success and harness the potential of data to predict future performance of providers. This will allow risk to be identified and tackled early, and enable more effective enhancement of education to mitigate risk and develop better provision.

Keeping pace with regulatory changes demands ongoing, careful reflection on a range of issues to do with the design and operation of our review processes. This includes consideration of the balances between both consistency and flexibility, and regulation and innovation, as well as the opportunities and risks offered by new technologies and the skill sets reflected by our staff and reviewers.

The primary implication of recent changes to our funding (see section 9.5) is that QAA must offer services to our subscribers that are even more highly valued than they have been before. We have strong foundations to build on in meeting this challenge, but the growing diversity in UK higher education now gives it greater complexity.

At the time of writing this SAR, the UK Government is consulting on the suitability of QAA to be the designated quality body (DQB) to work with the new Office for Students in England. The DQB will have an important role in maintaining the widely respected approach of co-regulation of UK higher education, assessing quality and standards, and advising the Office for Students on whether applicant providers meet the high-quality bar required to enter the system, award their own degrees, or achieve university title.

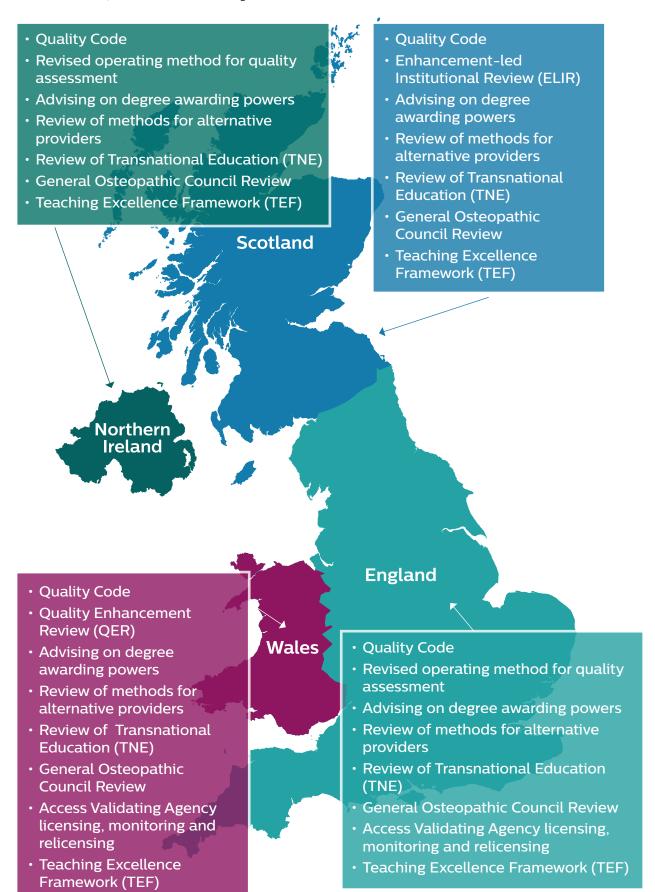
In the medium term, our work will focus on the reform of the regulatory frameworks in England and Wales, and our continued work across all jurisdictions in the UK, including a Quality Code that is appropriate and effective for all.

Glossary

Clossary
For a full glossary of terms, please see the Glossary on QAA's website. 169

Annexes

Annex 1: QAA activities by UK nation



Annex 2: Alignment of key principles with the methods in scope for the QAA review by ENQA 2018 170

Review method			Meth	Method includes the following principles	e following pri	nciples			Comments
	Self- assessment	Site visit	Published report	Consistent follow-up	Peer reviewers	Student reviewers	Published outcome criteria	Complaints and appeals	
HER (AP)	>	>	>	^	>	>	>	>	
ELIR	>	>	>	<u> </u>	>	>	>	>	
QER	1	1	ı	1	1	1	1	1	Review method has yet to be finalised
DAP	>	>	>	1	>	>	>	>	>
				QAA undertakes the scrutiny process on behalf of the relevant government higher education ministry					
IQR	>	>	>	<u> </u>	>	>	>	>	
QRV	>	>	>	>	>	>	>	>	
			Not all follow-up activity is undertaken by QAA, as specified by the revised operating model						

GOSC's statutory responsibilities for professional education are set out in the Osteopaths Act 1993	
Both QAA and GOsC have complaints schemes. Outcomes are not appealable, reflecting GOsC's status as a statutory regulator.	s QAA has its own complaints process. Outcomes cannot be appealed. Appeals on the grounds of procedural irregularity are made to the funding body.
>	The process guidance is produced and published by the funding body
Appointment of reviewers is the responsibility of GOSC; it does not currently include the appointment of student reviewers although GOSC has said that it will consider this next year.	>
>	>
Follow-up by GOSC with QAA involvement when requested	Follow-up by QAA on the request of the funding body
- Reports are published by GOsC	Reports are published by the funding body
>	>
>	>
GOsC	UQSI

>	There is a complaints	process but	cannot be	appealed	\ <u>\</u>	Providers	can	complain.	There is no	appeals	sample as	there are no	judgements	attached to	reviews.
>					>										
>	Includes student	reviews if	to the	scope of the investigation	>	Student	reviewers are	recruited and	deployed	according to	their expertise				
>					>	Enhancement		pa	providers and	wider sector	to discuss and	share lessons	р		
>					>	Enhan	event	reviewed	provid	wider	to disc	share	learned		
>					>	In-country	mple of	livery	es						
>					\ <u>\</u>	<u>:</u>	Sa	de	sit						
Concerns					JNE										

Annex 3: How QAA's external review methods meet the standards set out in ESG part 1

The table below details how QAA, through the various review methods it operates on behalf of sector bodies or independently, considers the effectiveness of internal quality assurance arrangements as described in Part 1 of the ESG, highlighting the various reference documents that are used as part of the review process.¹⁷¹

ESG Standard	Reference documents used in the	Methods that use the specific
	review process	reference documents
1.1 Policy for Quality Assurance	Quality Code, specifically Expectations	 Higher Education Review (Alternative
Institutions should have a	•	Providers) • Enhancement-led Institutional Review
policy for quality assurance that		. Onlity Enhancement Dougow
of their strategic management.	• B10 Managing Higher Education Provision	· Degree Awarding Powers
Internal stakeholders should		 Review of Transnational Education
develop and Implement this policy through appropriate	Quality Code (applicable Expectations as	· Quality Review Visit (Gateway)
structures and processes, while	above)	 Unsatisfactory Quality Scheme/Concerns
involving external stakeholders.	The relevant HE Code of Governance	 Quality Enhancement Review
	ESG 1.1	 International Quality Review
1.2 Design and approval of	Quality Code, specifically Expectations	 Higher Education Review (Alternative
programmes	• A1 UK and European Reference Points for	Providers)
Institutions should have	Academic Standards	 Enhancement-led Institutional Review
processes for the design and	• A3 (A31 A32 A33 A34) Securing	 Quality Enhancement Review
approval of their programmes.	Academic Standards and an Outcomes-	 Degree Awarding Powers
The programmes should be designed so that they meet	Based Approach to Academic Awards	 Review of Transnational Education
the objectives set for them,	• B1 Programme Design, Development	• Concerns
including the intended learning	and Approval	
The alification reculting from		(,,c,,,c,+,c,), (,,c,,,c,,c,,c,,c,,c,,c,,c,,c,,c,,c,,c,,
a programme should be clearly	Quality Code (applicable Expectations as above)	dailty heview visit (dateway)
specified and communicated.		 Unsatisfactory Quality Scheme
and refer to the correct level	The relevant HE Code of Governance	
of the national qualifications	Quality Code B1	 General Osteopathic Council Review
tramework for higher education and consecuently	GOsC Osteopathic Practice Standards	
to the Framework for	ESG 1.2	 International Quality Review
Qualifications of the European		
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1.3 Student-centred learning, teaching	Quality Code , specifically Expectations	• Higher Education Review (Alternative
and assessment Institutions should ensure that the	• A3 (A3.4) Securing Academic Standards and an Outcomes-Based Approach to Academic Awards	Providers) • Enhancement-led Institutional Review
programmes are delivered in a way	• B3 Learning and Teaching	Quality Enhancement Review
an active role in creating the learning process, and that the assessment of	• B4 Enabling Student Development and Achievement	 Degree Awarding Powers Review of Transnational Education
students reflects this.	• B5 Student Engagement	· Concerns
	• B6 Assessment of Students and the Recognition of Prior Learning	
	• B7 External Examining	
	• B9 Academic Appeals and Student Complaints	
	The Scottish higher education model complaints handling procedure	
	Quality Code (applicable Expectations as above)	 Quality Review Visit (Gateway)
	OIA Good Practice Framework for handling complaints and academic appeals	Unsatisfactory Quality Scheme/ConcernsQuality Enhancement Review
	Principles of good complaint handling – Parliamentary and Health Service Ombudsmen Northern Ireland	
	Quality Code, specifically Expectations	· General Osteopathic Council Review
	• B6 Assessment of Students and the Recognition of Prior Learning	
	• B7 External Examining	
	ESG 1.3	 International Quality Review

1.4 Student admission, progression,	Quality Code, specifically Expectations	· Higher Education Review (Alternative
recognition and certification	• A2.2 Definitive records of individual programmes	Providers)
Institutions should consistently apply	and qualifications	 Enhancement-led Institutional Review
pre-defined and published regulations	• B2 Recruitment, Selection and Admission to	Quality Enhancement Review
'lifo o'alo' o a ctudost admircios	Higher Education	 Degree Awarding Powers
progression, recognition and certification.	 B6 Assessment of Students and the Recognition of Prior Learning 	Review of Transnational Education Concerns
	• C Information about Higher Education Provision	
	Quality Code (applicable Expectations as above)	· Quality Review Visit (Gateway)
	Competitions and Market Authority (CMA) - Higher	Unsatisfactory Quality Scheme/Concerns Duality Enhancement Boxiess
	CMA's review of consumer law compliance	
	Ouality Code specifically Expectations	· General Osteopathic Council Review
	• B3 Learning and TeachingB7 External Examining	
	ESG 1.4	International Quality Review
1.5 Teaching Staff	Quality Code, specifically Expectation	 Higher Education Review (Alternative
Institutions should assure themselves	• B3 Learning and Teaching	Providers)
of the competence of their teachers.		 Enhancement-led Institutional Review
They should apply fair and transparent processes for the recruitment and		 Quality Enhancement Review
development of the staff.		 Degree Awarding Powers
		 Review of Transnational Education
		 Quality Review Visit (Gateway)
		 Unsatisfactory Quality Scheme/Concerns
	ESG 1.5	International Quality Review

1.6 Learning resources and student	Quality Code, specifically Expectation	 Higher Education Review (Alternative
support	• B3 Learning and Teaching	Providers)
Institutions should have appropriate		 Enhancement-led Institutional Review
funding for learning and teaching	 B4 Enabling Student Development and Achievement 	 Quality Enhancement Review
activities and ensure that adequate and		 Degree Awarding Powers
readily accessible learning resources and		 Review of Transnational Education
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	ESG 1.6	 International Quality Review
1.7 Information Management	• Quality Code, specifically Expectations	· Higher Education Review (Alternative
Institutions should ensure that they	• A3 (A3.3) Securing Academic Standards and an	Providers)
collect, analyse and use relevant	Outcomes-Based Approach to Academic Awards	 Enhancement-led Institutional Review
information for the effective management of their programmes and other activities	• B8 Programme Monitoring and Review	 Quality Enhancement Review
	Enhancement. General Introduction to Quality	• Degree Awarding Powers
	Code	 Review of Transnational Education
		 Quality Review Visit (Gateway)
		 Unsatisfactory Quality Scheme/Concerns
	Quality Code (applicable Expectations as above)	 Quality Review Visit (Gateway)
		 Unsatisfactory Quality Scheme/Concerns
	ESG 1.7	 International Quality Review

1.8 Public Information	Quality Code, specifically Expectation	· Higher Education Review (Alternative
Institutions should publish information	• B3 Learning and Teaching	Providers)
about their activities, including		 Enhancement-led Institutional Review
programmes, which is clear, accurate,	• b4 Enabling Student Development and Achievement	 Quality Enhancement Review
objective, up to date and readily		 Degree Awarding Powers
accessible.		 Review of Transnational Education
		· Concerns
	Quality Code (applicable Expectation as above)	 Quality Review Visit (Gateway)
	Competitions and Market Authority (CMA) - Higher	 Unsatisfactory Quality Scheme
	Education: consumer law advice for providers	 Quality Enhancement Review
	CMA's review of consumer law compliance	•
	ESG 1.7	 International Quality Review
1.9 On-going monitoring and periodic	Quality Code, specifically Expectations	· Higher Education Review (Alternative
review of programmes	• A3 (A3.3) Securing Academic Standards and an	Providers)
Institutions should monitor and	Outcomes-Based Approach to Academic Awards	 Enhancement-led Institutional Review
periodically review their programmes to	• B8 Programme Monitoring and Review	 Quality Enhancement Review
set for them and respond to the		 Degree Awarding Powers
needs of students and society. These		 Review of Transnational Education
improvement of the programme.		 Quality Review Visit (Gateway)
Any action planned should be		 Unsatisfactory Quality Scheme/Concerns
communicated to all those concerned.	ESG 1.8	· International Quality Review

1.10 Cyclical external quality assurance Institutions should undergo external quality assurance in line with the ESG on a cyclical basis.	Cyclical, every four years + annual monitoring	· Higher Education Review (Alternative Providers)
	Reviews conducted on a 4+1 cycle where institutions are reviewed in years 1-4 followed by a year of reflection and development ELIR incorporates an annual discussion as part of the approach	· Enhancement-led Institutional Review (ELIR)
	Maximum six years between reviews (can be scheduled earlier following a change in direction or status, e.g. a merger, or if risks emerge)	· Quality Enhancement Review
	N/A	• Degree Awarding Powers
	See detail in sections above for nature of the review method	Review of Transnational Education
	QRV is a requirement for the Gateway process. Provider in development will be reviewed again after four years. 'Established providers' who have completed the developmental stage are required to provide yearly updates on their data monitoring, intelligence gathering and scrutiny, and to undergo review every five years according to the baseline requirements for established providers. This is carried out by HEFCE.	· Quality Review Visit (Gateway)
	N/A	· Unsatisfactory Quality Scheme/Concerns
	Cyclical, normally every five years (three years for a new programme) plus annual monitoring	• General Osteopathic Council Review
	ESG 1.10; Option to be reviewed every four years	· International Quality Review

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